



Corporate Code of Conduct

Introduction

Legislation exists which requires companies to establish procedures for individuals who uncover or have concerns about questionable accounting or auditing practices to report such matters to management. Such procedures must allow for the confidential and anonymous receipt of such complaints.

As part of this Guide to Corporate Conduct, we have in place a program under which employees can raise issues of ethical concern to be reviewed or investigated. Financial integrity has always been a requirement of our corporate culture, and concerns about financial integrity are to be reported in accordance with this Guide.

Complaints relating to corporate conduct, including questionable accounting or auditing matters can be made in a confidential, anonymous manner to the Help Line at 1-800-9-HELP-44 or by writing to the General Counsel, Hasbro, Inc., P.O. Box 496, Pawtucket, RI 02862. While it may not always be possible to maintain confidentiality concerning the results of an investigation into questionable accounting or auditing practices, submissions can be done anonymously either by phone or letter.

Additionally, concerns relating specifically to any accounting, internal accounting or auditing matter may be sent confidentially to the Audit Committee of Hasbro's Board of Directors. The Chair of the Audit Committee, without review by any Hasbro employee, will decide next steps for investigating such a matter. Send confidential concerns directly to: Chair, Audit Committee to the Board of Directors, Hasbro, Inc., P.O. Box 497, Pawtucket, RI 02862.

Message from CEO

Hasbro's Commitment

All of us at Hasbro are proud of our tradition of conducting our business pursuant to the highest ethical and legal standards. This Guide to Corporate Conduct reinforces our commitment to these standards. It is designed to help us act in an ethical manner and in compliance with the laws and guidelines which apply to everyone at Hasbro. Hasbro wants to be a leader in all aspects of our business. However, we need your help to achieve this goal. Follow your best instincts and refer to this Guide when you have questions. I am confident that together we can make the integrity and honesty with which we conduct our business a reason for all of us to be proud.

Our Duty

It is Hasbro's policy to comply with all laws governing its domestic and foreign operations and to conduct its affairs using the highest moral, legal and ethical standards. All of our employees have a duty to conduct Hasbro's business affairs consistently with both the letter and the spirit of the law.

Your Responsibilities

Every Hasbro employee is responsible for his or her own actions and the consequences for those actions. We are sometimes faced with situations where there are pressures to act unethically. However, at Hasbro we depend on each other to conduct our business with honesty and integrity. Please be assured that compromises in behavior which lead to violations of our standards will not be considered to be a benefit to the company and are not acceptable. Hasbro expects every employee to comply with the law and to alert management if you discover or suspect that an illegal, dishonest or unethical act is being committed. This Guide applies to all employees of Hasbro, its subsidiaries and affiliates and, in some instances, to the visitors and vendors of Hasbro.

Use of the Guide

The Guide is intended to assist you in the exercise of sound judgment. It provides a brief summary of the basic standards of ethics and conduct which Hasbro follows. It is the obligation of all of our employees to adhere to these standards.

The Guide is intended to provide:

- Specific policies about our business practices
- Clear guidelines about the values and attitudes which should govern employee decisions and actions
- Resources available to employees to support responsible business practices.

You should be familiar with the policies contained in the Human Resources handbook, and you may be familiar with other specific policies that apply to your work area.

If you are troubled with an issue or have difficulty interpreting Hasbro's policies, help is available. You are encouraged to speak with your supervisor or use the resources described in this Guide.

This Guide to Corporate Conduct and the policies and procedures set forth herein do not constitute contractual terms or conditions of employment and should not be construed as expressed or implied contractual commitments. This Guide is subject to change at the sole discretion of Hasbro.

In addition to these parties, the Guide to Corporate Conduct also applies to the members of Hasbro's Board of Directors and to the members of the boards of directors of Hasbro's subsidiaries and affiliates.

Violations of this Guide by any director may result in one or more of the following, as appropriate: a warning; a reprimand; removal; required reimbursement for losses or damages; and referral for criminal prosecution or civil action.

Waivers of Guidelines of Corporate Conduct

Definition

Hasbro is committed to the ethical conduct of its business, including adherence to the principles set forth in the Guide to Corporate Conduct.

Policy

Hasbro does not generally expect to provide waivers to its officers, directors or employees of their need to comply with the Guide to Corporate Conduct.

However, in the event that a waiver is requested, no waiver of the principles set forth in the Guide will be made unless approved in writing by the General Counsel or Hasbro's Board of Directors, subject to the further requirement set forth in the following sentence.

Any waiver of the provisions of the Guide to Corporate Conduct involving an executive officer, senior financial or accounting officer or director of Hasbro must be approved by Hasbro's Board of Directors and will be promptly disclosed if such disclosure is mandated under the provisions of any applicable laws, rules and regulations, including the requirements of the rules applicable to companies listed on the New York Stock Exchange.

Implementation of the Guide

Expect Ongoing Communication

- All employees will be provided with a copy of this Guide to Corporate Conduct and are expected to thoroughly review it.
- You will be required to sign an acknowledgement form upon receipt of this Guide and will be required to sign new acknowledgement forms when you receive periodic updates. These forms will be kept in each employee's personnel file.
- You may also be required to attend periodic sessions for training on the Guide to Corporate Conduct or on new policies and practices as applicable.

Ethics Officer - The General Counsel's Role

- To ensure continuing attention to matters of ethics and standards on the part of all of our employees, Hasbro has given the General Counsel the responsibility of acting as Hasbro's corporate ethics officer.
- The General Counsel shall have the responsibility of monitoring performance under this Guide to Corporate Conduct and for resolving ethical concerns presented hereunder.
- It is the responsibility of every employee to report any violation or apparent violation of Hasbro's Guide to Corporate Conduct.
- If you have any questions about this Guide or if you have suspicions of any violations, you should contact the General Counsel immediately or use the confidential Helpline number below. If this procedure is not practical for any reason, you should contact anyone in management at your facility who should then refer the matter to the General Counsel.
- Employee reports will be handled as confidentially as possible.

Helpline

800-9HELP44

- Any questions you may have about this Guide, or ethical concerns in general, or information you may have with respect

to suspected violations of the law or Hasbro's policies, should be referred to the General Counsel's office at 1027 Newport Avenue, Pawtucket, Rhode Island 02862.

- Hasbro has provided a special HELPLINE number 800-9HELP-44 for you to use in contacting the General Counsel's office.
- You may also write to the General Counsel's office at P.O. Box Number 496, Pawtucket, Rhode Island 02862. Your referrals will be kept as confidential as possible.

Discipline

- Any infraction of applicable laws or of prevailing business ethics or of the requirements of this Guide can have severe consequences for both Hasbro and its employees and will subject the offending employee to disciplinary action.
- Disciplinary measures will apply to any supervisor who directs or approves of such actions, or has knowledge of them and does not promptly correct them.
- Violations of this Guide by any employee may result in one or more of the following, as appropriate: a warning; a reprimand (noted in the employee's personnel record); probation; demotion; temporary suspension; discharge; required reimbursement for losses or damages; and referral for criminal prosecution or civil action.
- Conduct which violates this Guide may also violate federal or state laws. Such violations may subject the employee to prosecution, imprisonment and fines. Hasbro may also be subject to prosecution and fines for the conduct of its employees.
- Reporting possible violations of this code will not result in retaliation against you for making this report.

Advertising, Marketing and Promotion

Definition

Statements by employees regarding Hasbro's products shall not be untrue, misleading, deceptive, fraudulent or falsely disparaging of competitors.

Policy

It is Hasbro's policy to be truthful, fair and honest in the advertising, marketing, and promotion of its products. All advertising and promotion of Hasbro products should be appropriate in nature to a children's and family entertainment company.

Important to Know

All such statements shall be in compliance with the guidelines of the Federal Trade Commission, as well as other applicable federal and state laws and regulations.

Q&A

Q.What is the Federal Trade Commission most concerned about?

A.The FTC seeks to prohibit deceptive advertising which can include practices such as false factual claims about product performance,(ie. race car travels faster than it actually does) or enhancing commercials to make product features appear to perform better than they actually do.

Alcohol and Drugs in the Workplace

Definition

No employee, visitor, contract worker, consultant or vendor may use, possess, distribute or be under the influence of illicit drugs at any time while on company property or on company business. The use or possession of alcoholic beverages by company employees on company premises is not allowed. Employees are also prohibited from reporting to work under the influence of alcohol, including reporting to work after having consumed alcohol during meals or break periods.

Policy

Hasbro is firmly committed to maintaining a safe, productive and healthy workplace and to meeting its obligations under applicable federal, state and local drug and alcohol laws. Hasbro has in place drug and alcohol policies which all employees are required to follow as a condition of initial and continued employment. Hasbro stands committed to firmly confront any substance abuse problems of its employees.

Important to Know

- Any person violating this policy will be immediately removed from the premises and may be subject to disciplinary action and possible criminal prosecution.
- The only exceptions to this policy are at company-approved functions or at off-premise business occasions at which alcohol is served. Consumption of alcohol in these situations is permitted in moderate amounts, but appropriate standards of conduct must be maintained so that there is no interference with job performance.
- The serving of alcohol at company-sponsored events requires the advanced approval of the Senior Vice President of

Human Resources.

Q&A

Q.What about my behavior after work, with co-workers, at a non-business function - am I allowed to drink with my co-workers then?

A.As long as you are off company premises and are not returning to work, moderate consumption of alcohol with co-workers or clients is acceptable.

Anti-Boycott Compliance

Definition

Employees who do business with foreign countries may receive requests from outside persons or companies asking that Hasbro refuse to do business with a boycotted country that is friendly with the United States or with businesses or nationals thereof, or with any person who deals with such boycotted country, business or person. Employees may also receive requests from outsiders to provide information regarding Hasbro's dealings or proposed deals with any such boycotted country, business or person.

Policy

It is Hasbro's policy to comply with all applicable laws on these matters, particularly the Export Administration Act and the Internal Revenue Code.

Important to Know

- The Export Administration Act and the Internal Revenue Code contain laws that generally prohibit entering into boycott-related agreements or providing boycott-related information.
- These laws generally require that any boycott-related requests be reported to the United States Department of Commerce and the Treasury Department.
- These requests may appear in the small print of letters of credit, shipping and customs documentation and may not, therefore, be obvious.
- If you receive any boycott-related request, you should immediately consult with the General Counsel.

Q&A

Q.What areas of the corporation have been impacted the most by these requests?

A.Typically, requests of this nature have been made in Hasbro's International and Purchasing areas.

Antitrust Laws

Definition

The antitrust laws of the United States are intended to protect and promote vigorous and fair competition. These laws apply to all domestic and some foreign transactions by United States businesses.

Policy

The following are among those which constitute violations of applicable laws and must not be engaged in under any circumstances:

- Agreements with competitors to fix prices or any other terms and conditions of sale
- Agreements with competitors to boycott specified suppliers or customers
- Agreements with competitors to allocate products, territories or markets, or to limit the production or sale of products or product lines
- Agreements with customers to fix resale prices
- Any behavior which may be construed as an attempt to monopolize

Important to Know

- You should never engage in discussions of such matters with representatives of other companies.
- You should report to the General Counsel any instance in which such discussions are initiated by other companies.
- The international activities of Hasbro may be subject to antitrust laws of foreign nations and organizations.
- Because of the complexity of antitrust laws, any questions regarding their interpretation should be referred to the General Counsel.

Q&A

Q.How does our practice to designate specific markets or territories for products fit within these prohibitions?

A.The antitrust laws do allow for unilateral business practices such as designating specific products or territories.

Bribes and Kickbacks

Definition

A bribe or kickback includes any item or favor provided for the purpose of improperly obtaining favorable treatment or seeking a competitive advantage.

Policy

Anyone receiving a solicitation, whether direct or indirect, for payment or other remuneration by any vendor to Hasbro should immediately report such activity to the General Counsel. Any employee who pays or receives bribes or kickbacks will be subject to discipline, up to and including discharge, and may be reported to the appropriate authorities.

Important to Know

- The difference between a gift and a bribe is a question of intent. Giving or accepting anything of value is inappropriate if it could be reasonably interpreted as an effort to influence a business relationship or decision. An example would be influencing a contract award or other favorable customer retention efforts.
- All employees should be alerted to circumstances which may indicate that improper activities are occurring or contemplated.
- Employees who do business in foreign countries often become aware of customs involving the exchange of gifts or the paying of certain fees. It is Hasbro's policy to comply with all applicable laws on these matters, particularly the Foreign Corrupt Practices Act. This law restricts payments to officials of foreign government, political parties, and candidates for office.

Q&A

Q.What about instances where it is customary to exchange gifts with vendors or clients, such as in foreign countries.

A.As customs vary from country to country, in some instances a gift may be both necessary and appropriate.

Conflicts of Interest and Corporate Opportunities

Definition

A conflict of interest occurs when an individual's private interest interferes in any way with the interests of the Company as a whole.

Policy

A conflict situation can arise when an employee or director takes actions or has interests that may make it difficult to perform his or her work for the Company in an objective and effective manner. Conflicts of interests also arise when you, a member of your family, or a friend receive improper personal benefits as a result of your position in the Company. All employees and directors are required to conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of the Company. Sometimes even the appearance of impropriety can have a detrimental effect on the Company. In additional, you may not exploit your positions or relationships with Hasbro for personal gain.

As an employee or director of the Company you owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. You may not take for yourself personally opportunities that are discovered through the use of the Company's property or information or your position with the Company. Similarly, you may not use the Company's property or information, or your position with the Company, for personal gain. You are expected not to compete with the Company.

Q&A

Q.What should I do if I believe I may have a potential conflict of interest?

A.You should immediately discuss the situation with your supervisor and the General Counsel.

Conflicts of Interest and Corporate Opportunities (continued)

Definition

You may not exploit your positions or relationships with Hasbro for personal gain.

Policy

All employees should conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of the Company. Sometimes even the appearance of impropriety can have a detrimental effect on the company.

Important to Know

Apparent conflicts of interests can arise easily particularly as a result of contact with many different kinds of people and entities including: customers, suppliers' present or prospective employees, shareholders, or members of the community.

Examples of conflicts of interest may include the following:

- Ownership of a financial interest in Hasbro's vendors, customers, or competitors.
- Engaging in business transactions with firms owned or controlled by an employee or an employee's relatives or friends.

Q&A

Q.Is there a problem with my owning stock in one of our major competitors?

A.A nominal or modest ownership interest of our competitors that are publicly traded should not create a conflict of interest. A substantial ownership interest of any competitor will create a conflict of interest for you.

Confidential Information

Definition

All of the Company's business information and records are the property of Hasbro and should be used only for Hasbro's business purposes.

Policy

Except to the extent that limited records are specifically designated as non-confidential, all of the Company's records, information, data and files are considered confidential, whether developed internally or obtained from an employee, customer, supplier or other person.

Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company, its customers, suppliers or other persons with whom the Company does business, if disclosed. It is the responsibility of each of us to protect the confidentiality of this information.

Such information is not to be used or reproduced for any personal use or the use of friends and family, and is not to be provided to anyone outside of the Company, except as authorized by the Company.

Important to Know

Employees and directors should take every practical step to protect the Company's confidential information. You are required to avoid discussing confidential information in places where you can be overheard. You should also avoid discarding confidential documents where others can retrieve them.

Q&A

Q.What should I do if I have a question regarding Hasbro's policy on the treatment of confidential information, or whether a particular item of information is confidential?

A.You should contact the Office of the General Counsel for advice.

Dress and Appearance Guidelines

Definition

Employees are expected to dress in a manner appropriate to the job they perform.

Policy

It is important that employee attire and appearance reflect the professional atmosphere in which we work. Hasbro employees should utilize good judgment regarding their dress and appearance.

Important to Know

Since the nature of our work varies from location you should consult with your supervisor for specific guidelines.

Q&A

Q.Why does there seem to be inconsistency in the dress codes at different locations across the company?

A.Depending on the location and the business function, what constitutes appropriate professional dress may vary.

Fair Dealing

Definition

Each of the Company's employees, officers and directors is required to deal fairly with the Company's customers, suppliers, competitors and employees.

Policy

None of us should take unfair advantage of another person or business through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Important to Know

We must never use any illegal or unethical methods to gather competitive information.

Q&A

Q.What should I do if I obtain information I believe may constitute a trade secret or confidential information of another business?

A.You should consult with your supervisor and the General Counsel's office immediately.

Financial Integrity

Definition

All Hasbro funds must be retained in corporate accounts and no undisclosed or unrecorded fund or asset shall be established for any purpose. No false or deceptive entries may be made and all entries must contain an appropriate description of the underlying transaction.

Policy

Hasbro's books and records are maintained in a manner that provides for an accurate and auditable record of all financial transactions in conformity with generally accepted accounting principles.

Important to Know

- All employees should be alert to circumstances which may indicate that improper activities are occurring.
- All reports, vouchers, bills, invoices, payroll and service records and other essential data must be prepared with care and honesty.

Q&A

Q.What if I suspect my boss is cheating on his or her expense reports?

A.You should report such concerns immediately to the General Counsel. Please keep in mind that you will not be retaliated against for raising such a concern.

Gifts

Definition

For the purposes of this policy, a gift is considered of nominal value if its retail value is less than \$100.00.

Policy

Except for gifts of nominal value, neither employees nor their relatives may give or receive gifts to or from Hasbro's customers, suppliers, vendors or other business partners.

Important to Know

- When contemplating giving gifts of nominal value, be aware and respectful of our business partners' own guidelines about the same.
- No gifts may be given to or received from government officials without prior approval from the Senior Vice President of your department.
- Under no circumstances may gifts in the form of cash, stocks, bonds (or similar type items) be given or accepted.
- In the course of conducting normal business relationships, acceptance of or providing reasonable business meals or entertainment at sporting or similar types of events is generally not considered improper. Entertainment of this nature should occur infrequently and not involve excessive expenditures. In no circumstances should such entertainment be considered an inducement to obtaining business opportunities or advantages from Hasbro.
- Certain functional areas of Hasbro in which employees are regularly involved in purchasing, selling and other transactional activities have more specific requirements.
- Consult your supervisor and the specific policies related to your area for further information on any special requirements you may have.

Q&A

Q.Why is the company concerned about my receiving a gift if it is not a bribe or kickback?

A.The company is concerned at your ability to exercise good judgment on behalf of Hasbro. Business dealings may be compromised by your receiving excessive gifts.

Honest and Ethical Conduct and Compliance with Laws, Rules and Regulations

Definition

Each of us is required to act with honesty and integrity. We are all required to act ethically and to comply with all applicable governmental laws, rules and regulations in the conduct of Hasbro's business.

Policy

You must not engage in any illegal or improper conduct in connection with the performance of your duties for the Company. In performing our jobs, all of us are required to act in good faith, with due care, competence and diligence, and not to misrepresent any information.

Important to Know

Perceived pressures from supervisors or demands due to business conditions are not excuses for violating the law.

The consequences to the Company and its directors, officers and employees from any departure from this policy can be severe.

Q&A

Q.What should I do if I have a question regarding any laws or requirements applicable to the Company?

A.You should contact the Office of the General Counsel immediately if you have any questions regarding applicable laws, rules or regulations.

Insider Trading

Definition

It is illegal to buy or sell securities while possessing material, nonpublic information.

Policy

It is the policy of Hasbro that all employees who, in the course of their employment, come into possession of material, nonpublic information concerning Hasbro, its customers or suppliers, or any other publicly held company, must keep the information confidential and not trade in the securities of Hasbro or any such company, or pass on such information to others who may trade.

Important to Know

- Anyone who gives such undisclosed information to others may be subject to disciplinary action and possible prosecution.
- The penalties for violations of the securities laws are severe and may include both civil and criminal liability.
- Any person who has any questions about specific securities transactions should obtain additional guidance in advance of the transaction from the General Counsel

Q&A

Q.What is material, non-public information?

A.Material, non-public information is factual information which a reasonable investor would want to know in making an investment decision. Examples may include significant licenses, acquisitions, dispositions of assets, financial statements and reorganizations.

Protection of Corporate Property

Definition

Protection of Corporate Property includes employees, information, intellectual property, material and equipment as well as other areas in which exposure may exist.

Policy

All Hasbro's employees are responsible for ensuring that appropriate measures are taken to assure that corporate assets are properly protected.

Important to Know

- It is important that employees assist in the protection of all confidential and proprietary information including technical, financial, marketing and other business information which, if made available to Hasbro's competitors or the public, would be advantageous to such competitors or detrimental to Hasbro.
- The use of company assets such as computer networks, systems and software (including but not limited to e-mail and the Internet) shall be for business purposes only. Employees may not use these assets to review, receive or transmit inappropriate materials at any time.
- No employee should disclose or permit the release to any person (other than a fellow employee having a need to know such information) any confidential or proprietary information except as required by law.

Q&A

Q.Is it permissible to borrow company assets (such as computers, VCRs, camcorders, toys) for own personal use?
A.Corporate assets are not to be used for personal purposes. Any exception must be cleared with your supervisor.

Quality of Information and Public Disclosure

Definition

Hasbro is committed to providing full, fair, accurate, timely and understandable disclosure in all of its public communications and in the reports and other documents it files with, or submits to, the United States Securities and Exchange Commission.

Policy

All of Hasbro's public communications and filings with the Securities and Exchange Commission are carefully prepared to promote the accuracy, completeness, and timeliness of the information contained therein and to result in understandable disclosure. The Company's Chief Executive Officer, senior financial and accounting officers and all other persons participating in preparing any such communications, or in preparing and maintaining the underlying financial and other information contained in such communications, are required to vigorously apply these principles in performing their duties.

In order to assure this objective is achieved, all of us are required, in the course of performing our jobs, to provide the people within Hasbro who depend on our data and information, and the others to whom we are properly disclosing information, including the Company's external auditors, with information that is accurate, complete, objective, relevant, timely and understandable.

Important to Know

All employees involved in maintaining financial or accounting records are expected, to the extent such requirements are applicable to their jobs, to follow Hasbro's accounting policies and procedures, and to follow all other applicable standards, laws and regulations for accounting and financial reporting of transactions, including, without limitation, United States generally accepted accounting principles and generally accepted accounting principles for any other applicable jurisdictions.

Q&A

Q.What should I do if I believe there has been any error, misrepresentation or falsification of financial results or other matters addressed in any of Hasbro's public communications or filings with the Securities and Exchange Commission?
A.You should contact the Office of the General Counsel. Concerns can be submitted to the General Counsel anonymously in the manner described in the Guide to Corporate Conduct. You may also chose to send a confidential report to the Chair of Hasbro's Audit Committee of the Board of Directors at Hasbro, Inc. P.O. Box 497, Pawtucket, RI 02862. You will not be retaliated against for making any such report.

Relations with Employees

Definition

Hasbro recognizes that its continued success depends on the development and fair treatment of all of its employees.

Policy

It is Hasbro's continuing policy to:

- Provide equal opportunity for employment and advancement at every level of employment on the basis of ability and aptitude, without regard to race, color, religion, pregnancy, ancestry, age, gender, national origin, sexual orientation, mental or physical disability, marital status, or status as a disabled veteran or Vietnam era veteran and to conform to applicable laws and regulations.
- Maintain an atmosphere where employees are free from sexual harassment by supervisors, co-workers and visitors.

Important to Know

You should be sure to familiarize yourself with and follow all company policies with respect to Human Resources.

Q&A

Q.What should I do if I believe I am being treated in a discriminatory manner by my supervisor?

A.At Hasbro, it is important for employees to feel secure in the environment so individuals can fully contribute. If you feel you are being discriminated against, you should contact your Human Resources representative or the General Counsel immediately.

Workplace Health, Safety and Environment

Definition

Safe work practices include promptly reporting accidents and near misses, working diligently to correct safety hazards, and striving to maintain an overall posture of safety first. It also includes exercising good judgment with regard to the environmental aspects of our use of buildings and real estate, our manufacturing processes and our products. Additionally, discharge and disposition of hazardous materials should be performed only in a manner that complies with environmental protection laws.

Policy

Hasbro is committed to the safety and health of its employees worldwide. This includes the employees of vendors making Hasbro products throughout the world. Providing and maintaining a safe work environment and instituting and following work practices to safeguard employees must be a primary consideration for all of us. Reviewing all our businesses and identifying where we can act to improve safety awareness is an ongoing task to which the entire corporation and each employee should be dedicated. There is no job so important that we cannot take the time to complete it safely.

Important to Know

- Solid safety management is also a major part of our commitment and will be a priority area of accountability against which management performance will be measured.
- All employees must report any violation of environmental laws, or any suspected violation of environmental laws, in accordance with Hasbro's established procedures.
- Violations may include anything from a hazardous waste spill to improper record keeping on environmental matters.
- Any violations of these laws or Hasbro's established procedures should be reported to the General Counsel or the office of Hasbro's Director of Environmental Affairs.
- The Hasbro Corporate Health, Safety and Environment Committee has established specific policies to address issues in these areas. You should familiarize yourself and follow these policies and procedures.
- Hasbro's vendors are expected to follow Hasbro's Vendor Code of Business Conduct with respect to the working conditions in the vendor's facility.

Q&A

Q.What if I am asked by my supervisor to disregard a safety mandate in the interest of getting a high priority job done?

A.You should follow the safety mandate and to the extent your supervisor does not support this, please refer this to your Human Resources manager or the General Counsel.

Conclusion

Key Questions to Determine Appropriateness of Behaviors

Hasbro depends on all of our employees to safeguard Hasbro's standards and ethics. Although ethical requirements are sometimes unclear, the following questions will provide a good guideline for those in doubt about their behavior:

- Will my actions be ethical in every respect?
- Will my actions fully comply with the law and Hasbro's policies?
- Will my actions be questioned by my supervisors, associates, clients, family and the general public?
- How would I feel if my actions were reported in the newspaper?
- How would I feel if another employee, competitor, customer or vendor acted in the same way?
- Will my actions have the appearance of impropriety?

Unsure?

If you feel uncomfortable with the answer to any of the above questions, you should not take the contemplated actions without discussing them with the General counsel and obtaining assurance that such contemplated actions are appropriate. You should use the HELPLINE number (800) 9-HELP-44 to assist you with such matters or you may also write to the General Counsel at P.O. Box Number 496, Pawtucket, Rhode Island 02862.

February 2011