



Unilever

Code of Business Principles and Code Policies



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The Code and our Standard of Conduct



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Our Framework

Our Values

Our Values of Integrity, Respect, Responsibility and Pioneering are the simplest statement of who we are. They govern everything we do.

Code of Business Principles

Our **Code of Business Principles** is a simple ethical statement of how we should operate. We publish this externally and expect all others who work with us to set themselves equally high principles.

Code Policies

Our **Code Policies** define the ethical behaviours that we all need to demonstrate when working for Unilever. They are mandatory. While these are for internal use, we also publish them externally in support of transparency.

Foreword from Alan Jope

Welcome to the most important document we have at Unilever – our Code of Business Principles.

When I think of my time at Unilever, and consider why I have stayed for over 30 years, I put it down to two core reasons: our geographical diversity and the values of the business. Values that give us the instinct to do the right thing and to treat each other with respect.

Having a strong set of values that respect people, society, and the planet has always been at the heart of Unilever, and will continue to be critical to building our purpose-led, future-fit company. Our licence to operate and our ability to compete successfully, are dependent on each and every one of us living these values, day in and day out.

Yet we know that in this volatile and unpredictable world, we face numerous challenges in doing so. Challenges, but not excuses. Many of the countries in which we operate rank poorly in global corruption indices. The digital world increasingly presents us with new considerations for managing cyber and data security, and how our company and our brands 'show

up' in this connected, social media world has become more complicated than ever. What's more, the accelerating pace of change, and the greater speed with which we must operate, often intensifies these challenges.

The Code of Business Principles is our guidebook for putting our values into practice. It sets out a clear standard of conduct to ensure that we always make the right choice, providing a framework of simple "musts" and "must nots". It's a document which not only protects Unilever, and each and every one of us, but will help us to have a meaningful impact on the lives of millions of people across our value chain.

Much of Unilever's strength lies in the shared values of our people. Behaving with integrity is part of who we are. Thank you for your diligence and for helping to create a fairer and more principled world as we work towards delivering our vision of being the global leader in sustainable business.

Read and re-read our Code.
It matters.

Thank you,
Alan



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The Code of Business Principles (1 of 2)

Introduction

At Unilever we believe in growing responsibly and sustainably.

Our Code of Business Principles defines the non-negotiables for all our employees. It codifies our values, making clear what is expected from our people.

Through living our Code, we will bring our values and purpose to life, every day in everything we do.

Standard of Conduct

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees.

We shall similarly respect the legitimate interests of those with whom we have relationships.

We are committed to providing transparency across all our operations ensuring stakeholders trust what we do.

Obeying the Law

Unilever companies and employees are required to comply with the laws and regulations of the countries in which we operate.

Employees

Unilever is committed to a working environment that promotes diversity, inclusion, life-long learning and equal opportunity, including for those with disabilities. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards and in line with industry standards in the markets in which we operate. We are committed to giving employees a living wage, ensuring that they can meet their everyday needs.

We will not use any form of forced, compulsory, trafficked or child labour.

We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We will maintain good communications with employees through company-based information and consultation procedures.

We will provide transparent, fair and confidential procedures for employees and third parties to raise concerns. We will not retaliate against whistle-blowers or employees that raise issues with us.

Consumers

Unilever is committed to providing purposeful branded products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. Products and services will be accurately and properly labelled, advertised and communicated.

Shareholders

Unilever will conduct its operations in accordance with internationally accepted principles of good corporate governance. We will provide timely, regular and reliable information on our activities, structure, financial situation and performance to all shareholders.

Business Partners

Unilever is committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principles consistent with our own. This means compliance with our third party policies and a commitment to working with us to address issues that negatively impact society and the planet. We will work with these partners to raise standards so that their employees are paid a living wage and are not subject to forced, compulsory, trafficked or child labour.



The Code of Business Principles (2 of 2)

Compliance – Monitoring – Reporting

Compliance with these principles is an essential element in our business success. The Unilever Board is responsible for ensuring these principles are applied throughout Unilever.

The Chief Executive Officer is responsible for implementing these principles and is supported in this by the Global Code and Policy Committee which is chaired by the Chief Legal Officer.

Day-to-day responsibility is delegated to all senior management of the geographies, divisions, functions and operating companies. They are responsible for implementing these principles, supported by local Business Integrity Committees.

Assurance of compliance is given and monitored each year. Compliance is subject to review by the Board supported by the Corporate Responsibility Committee and for financial and accounting issues the Audit Committee.

Any breaches of the Code must be reported. The Board of Unilever will not criticise management for any loss of business resulting from adherence to these principles and other mandatory policies. Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.

Community Involvement

Unilever strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies and communities in which we operate.

Innovation

In our scientific innovation to meet consumer needs we will respect the concerns of our consumers and of society. We will work on the basis of sound science, applying rigorous standards of product safety.

Competition

Unilever believes in vigorous yet fair competition and supports the development of appropriate competition laws. Unilever companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

The Planet

Unilever is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

Unilever will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

Public Activities

Unilever companies are encouraged to promote and defend their legitimate business interests.

Unilever will co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests.

Unilever neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

Bribery & Corruption

Unilever does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe.

Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Unilever accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

Conflicts of Interests

All employees and others working for Unilever are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

Employees must not seek gain for themselves or others through misuse of their positions.

Data

Unilever is committed to the responsible, ethical and fair use of data.

We collect and use data in line with our values, applicable laws and with respect for privacy as a human right.

Note

In this Code the expressions 'Unilever' and 'Unilever companies' are used for convenience and mean the Unilever Group of companies comprising Unilever N.V., Unilever PLC and their respective subsidiary companies. The Board of Unilever means the Directors of Unilever N.V. and Unilever PLC.

Living the Code (1 of 2)

As a purpose-led company, our values are the foundation of our success and essential to achieving our ambition of making sustainable living commonplace.

Living the Code means to put our values into practice and reiterate our commitment to doing good; this helps us to deliver value with values. Our consumers and customers trust us for doing business with integrity. This is one of our greatest assets, and to maintain our reputation, requires the highest standards of behaviour.

Unilever's Code of Business Principles (the Code), and the policies that support it (Code Policies), set out the standards required from all our employees. Unilever also requires its third-party business partners and their employees to adhere to business principles consistent with our own.

These expectations are set out in Unilever's [Responsible Sourcing and Business Partnering Policy](#) that underpin our third-party compliance programme.

Breaching the Code or Code Policies could have very serious consequences for Unilever and for individuals involved. Where illegal conduct is involved, these could include significant fines for Unilever, imprisonment for individuals and significant damage to our reputation.

This Code Policy explains how to ensure the Code and all Code Policies are understood and followed by all our employees and others working for Unilever. It confirms everyone's responsibility to speak up and report suspected or actual breaches, and outlines how such situations must be managed. Any failure to comply with the Code and any of the Code Policies is taken very seriously by Unilever and may result in disciplinary action, including dismissal and legal action.

References in the Code and Code Policies to 'employees' include the following:

- Unilever employees, whether full time, part time, fixed term, permanent or trainees
- Persons with statutory director roles or equivalent responsibilities
- Unilever employees of joint ventures
- Employees of new acquisitions, from the date that the company is acquired

Living the Code is a team effort. The Code and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code and Code Policies must be upheld by exercising common sense and good judgement, always in compliance with applicable laws.

Musts

All [employees](#) must:

- Ensure they know and understand the requirements of our Code and Code Policies
- Undertake relevant training as required by their Line Manager or Business Integrity Officer
- Follow the Code and Code Policies: if they are unsure of how to interpret these or have any doubts about whether specific behaviours meet the standards required they must seek the advice of their Line Manager or Business Integrity Officer
- Immediately report actual or potential breaches of the Code or Code Policies, whether relating to them, colleagues or people acting on Unilever's behalf and whether accidental or deliberate. This includes instances where business partners' behaviour may not meet the same standards



Living the Code (2 of 2)

Musts

Their Line Manager is usually the right person to report potential or actual breaches. If this is not appropriate, they must talk to one of the following:

- Their Business Integrity Officer
- A member of the Business Integrity Committee in the country where concerns occur
- Unilever's confidential [Code Support Line](#) (where allowed by local law), by telephone or web using the telephone number or web address communicated locally
- If asked not to report a potential breach by their Line Manager or another employee, they must immediately report it to their Business Integrity Officer and / or the Code Support Line

In addition, those at Manager level and above must:

- Lead by example, setting a strong tone from the top, showing they are familiar with the Code and Code Policies and taking steps to embed a culture of integrity across all operations
- Complete an annual Code declaration
- Ensure that all their team members, including new joiners:
 - Have read the Code and Code Policies
 - Have completed any related mandatory training
 - Understand how to raise concerns and / or report actual or suspected breaches
- Deliver training that the Business Integrity Committee or their Line Manager has asked of them, e.g. Business Integrity Moments, face-to-face briefings and team discussions
- Offer guidance and support about the Code and Code Policies to their team where needed and escalate unresolved questions to their Business Integrity Officer
- Ensure that anyone who raises concerns, or highlights potential or actual breaches, receives support and respect and that there is no retaliation against them
- Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion and discussing them with their Business Integrity Officer as soon as possible to determine the appropriate course of action including whom else to inform
- Collaborate further and complete any documentation (e.g. case information and lessons learnt) as may be required of them by their Business Integrity Officer
- Insofar as a breach may have occurred within their operations, consider what additional communications, training or changes to business controls and procedures are necessary to reduce the likelihood of similar breaches occurring

Must nots

Employees **must not**:

- Ignore or fail to report situations where they believe there is or may be a breach of the Code or Code Policies
- Attempt to prevent a colleague from reporting a potential or actual breach or ask them to ignore an issue
- Retaliate against any person who reports a potential or actual breach
- Discuss any potential or actual breach under investigation with other persons, unless this has been cleared with the investigation team



Legal Consultation (1 of 2)

Employees must at all times comply with laws and regulations that apply to the countries in which Unilever operates. Ignorance of the law is no excuse. Timely legal consultation is essential to ensure that Unilever's legitimate business interests and opportunities are protected.

This Code Policy sets out how and in what circumstances employees must seek legal advice from Unilever Legal Group.

Musts

Heads of all market Cluster/country boards or senior leadership teams and heads of all category, corporate and functional leadership teams must ensure the relevant Legal Business Partner is a member of that leadership team upon request and / or that they have an open invitation to attend all team meetings and receive copies of all associated agendas and minutes.

All employees **must**:

- Immediately notify their Line Manager (or other appropriate person – see Code Policy on [Living the Code](#)) and take legal advice if they suspect or discover any illegal activity in relation to Unilever's operations or associated activities involving third parties.



Legal Consultation (2 of 2)

Musts

- Promptly seek advice from their Legal Business Partner in the following situations:
 - Commercial contracts, leases, licences and transactions – Commercial contracts for goods or services (unless Legal Group has expressly delegated authority to the business or set up a route for direct consultation of an external legal advisor); Contracts relating to intellectual property, such as, licences for technology, trademarks, joint development or technical assistance contracts; Treasury transactions, for example, raising equity or debt, asset leasing, derivative transactions (such as currency hedging or interest rate swaps) or guarantees of Treasury transactions; Transactions involving mergers, acquisitions, disposals or joint ventures
 - Litigation and regulatory action – Civil litigation, such as employment or contractual disputes, whether threatened or actual, by or against a Unilever company or employee, including commencement of or settlement of such litigation; Criminal prosecutions, whether threatened or actual, by or against a Unilever company or employee, or at Unilever's instigation;

Communication with government or regulatory bodies about investigations, including unexpected investigations, or where Unilever is seeking regulatory action, such as non-compliant labelling actions through local governmental bodies (see Code Policy on [Contact with Government, Regulators and Non-Governmental Organisations](#))

- Competition/antitrust – Compliance issues or questions involving competition/antitrust laws, such as trade terms, exclusivity arrangements or pricing; Meetings, contacts, collaboration, agreements or other activity, including participation in trade associations or industry groupings (formal and informal or ad hoc), which may involve the exchange of information with a competitor or restrictions on competition (see Code Policies on [Fair Competition](#), [Competitors' Information](#))
- Communication – Press releases that could impact Unilever's reputation or create legal liability, or contain 'inside' or 'price sensitive' information (see Code Policy on [Preventing Insider Trading](#))

- Claims, brands, trademarks, marketing materials – Product claims and marketing materials, including advertising, promotional materials, packaging and labelling, trade materials, advertorials, point-of-sale materials, and web content; Clearance for use of all brand names, marks, logos, slogans, celebrity endorsements and sponsorships; Maintenance, protection and disposal of trademarks, copyrights and domain names used by the business; Competitor challenges to claims, brands, trademarks either by or against a Unilever company
- Employment – Issues relating to non-compete obligations, employment disputes and terminations and non routine employment contract terms
- Safety – Product tampering or counterfeiting; Consumer complaints that may lead to legal disputes; Potential product recalls; Consumer, product, workforce or environmental safety incidents that could have legal implications
- Legal or governance structures – Changes to, or issues around, legal or governance structures at geographic or corporate level, such as changes in capital structures or Board membership, public company filings and arrangements/relationships with third-party shareholders

- Bribery and corruption – Bribery or corruption issues, including related allegations or uncertainty about situations that may have bribery or corruption implications (see Code Policy on [Anti-Bribery](#))

Employees must use their common sense and judgement in situations not covered above: if they are unsure, they must always err on the side of caution and consult Legal Group.

Must nots

Employees **must not**

- Do anything that Legal Group has advised is illegal and/ or unlawful. Where an activity is not illegal and / or unlawful but legal advice highlights significant risks for Unilever, such as litigation, they must not proceed without express senior line management authorisation
- Appoint a private investigator without prior approval from their General Counsel

Employees outside Legal Group **must not**

- Appoint, manage or remove external legal counsel or pay any legal fees that differ from the fee structures agreed by Legal Group

Responsible Risk Management



Risk management is integral to Unilever's strategy and to the achievement of Unilever's long-term goals. Our success as an organisation depends on our ability to identify and exploit the opportunities generated by our business and the markets Unilever operates in.

Unilever takes an embedded approach to risk management which puts risk and opportunity assessment at the core of the leadership team agenda. Unilever defines risks as actions or events that have the potential to impact our ability to achieve our objectives. Unilever identifies and mitigates downside risks such as loss of money, reputation or talent as well as upside risks such as failure to deliver strategy if it does not strengthen brand equities or grow in growing channels.

Unilever's Risk Management approach is embedded in the normal course of business with a set of global Principles of Risk Management with local implementation.

Its structural elements include:

- Governance of Unilever, organisational structure and delegation of authority
- Vision, Strategy and Objectives
- Code of Business Principles, Code Policies and Standards
- Risk and Control Frameworks
- Performance management and operational processes execution
- Compliance and assurance activities.

Musts

All managers and above **must** implement Unilever's Principles of Risk Management as follows:

- Accountability: they must identify and manage the risks that relate to their role
- Risk Appetite: they must determine the level of risk, after the implementation of controls, that they are prepared to accept such that there is not a significant threat to achieving their objectives
- Risk Mitigation: they must put adequate controls in place, and ensure that they are operational, in order to deliver their objectives

All members of leadership teams **must**:

- Ensure that the risk management activities, as outlined in Unilever's Risk and Control Frameworks, are being undertaken for their areas of responsibility

- Complete an annual holistic risk discussion during which:
 - Key business risks for which they are responsible are identified;
 - How those risks are being managed is reviewed;
 - Any gaps in their desired risk appetite are identified.
- Perform regular reviews and ensure risks are mitigated as desired.

All project leaders of transformational projects **must**, together with their teams:

- Identify the key risks associated with their project achieving its objectives
- Prepare risk mitigation plans
- Review progress with the project steering group.

Responsible Innovation



Innovation is fundamental to Unilever's business success and a core part of our global strategy. The integrity and objectivity of our Science are a key foundation for our approach to responsible innovation. Safety is non-negotiable.

Unilever conducts responsible, safe and sustainable research and innovation, which fully respects the concerns of our consumers and society. In meeting consumer needs, Unilever's innovations are based on sound science and technology, and reflect high standards and ethical principles.

Unilever has global standards that apply to all research and innovation, including on: the safe and sustainable design of new products, processes and packaging; product and brand development; open innovation collaborations; and publication of our scientific research.

Musts

All [employees](#) involved in scientific research and innovation activity **must** comply with all standards relevant to their area of work, notably in order to:

- Ensure that risks for consumer safety, occupational safety and the environment are suitably assessed and managed
- Ensure appropriate specifications of raw materials, products and packaging
- Ensure effective management of consumer safety risks from food allergens
- Ensure research on human subjects is conducted to the highest ethical standards

- Uphold Unilever's commitment to eliminate animal testing without compromising on consumer safety (see Developing Alternative Approaches to Animal Testing)
- Ensure the integrity, robustness, objectivity and transparency of all scientific research and collaborations with external partners (see Unilever's Position on Science with Objectivity and Integrity)
- Maintain and make accessible records of all research, including study protocols and data, and their interpretation and decisions made
- Raise any concerns about actual or potential non-compliance with this Code Policy with their Business Integrity Officer, Line Manager or their relevant Business Partner in R&D

Must nots

Employees **must not**:

- Deliver presentations or publications that have not been approved via internal clearance procedures
- Collaborate with third parties outside a structured and approved contractual framework

Product Safety & Product Quality



Unilever's reputation and success is founded upon providing safe high quality products and services that meet all applicable standards and regulation, both internal and external within the end to end value chain.

All employees have a role to play in ensuring that the products and services we provide meet and / or exceed the expectations of our consumers and customers.

Unilever will take prompt and timely action to recall products or services that don't meet our own high standards or those required by the marketplace.

Musts

Employees **must**:

- Apply effective processes to measure and record product and process performance and, where appropriate, take effective preventative steps or corrective action to assure great product quality experiences for our customers and consumers
- Promptly and proactively report all product safety or product quality concerns to their Line Manager or Business Integrity Officer

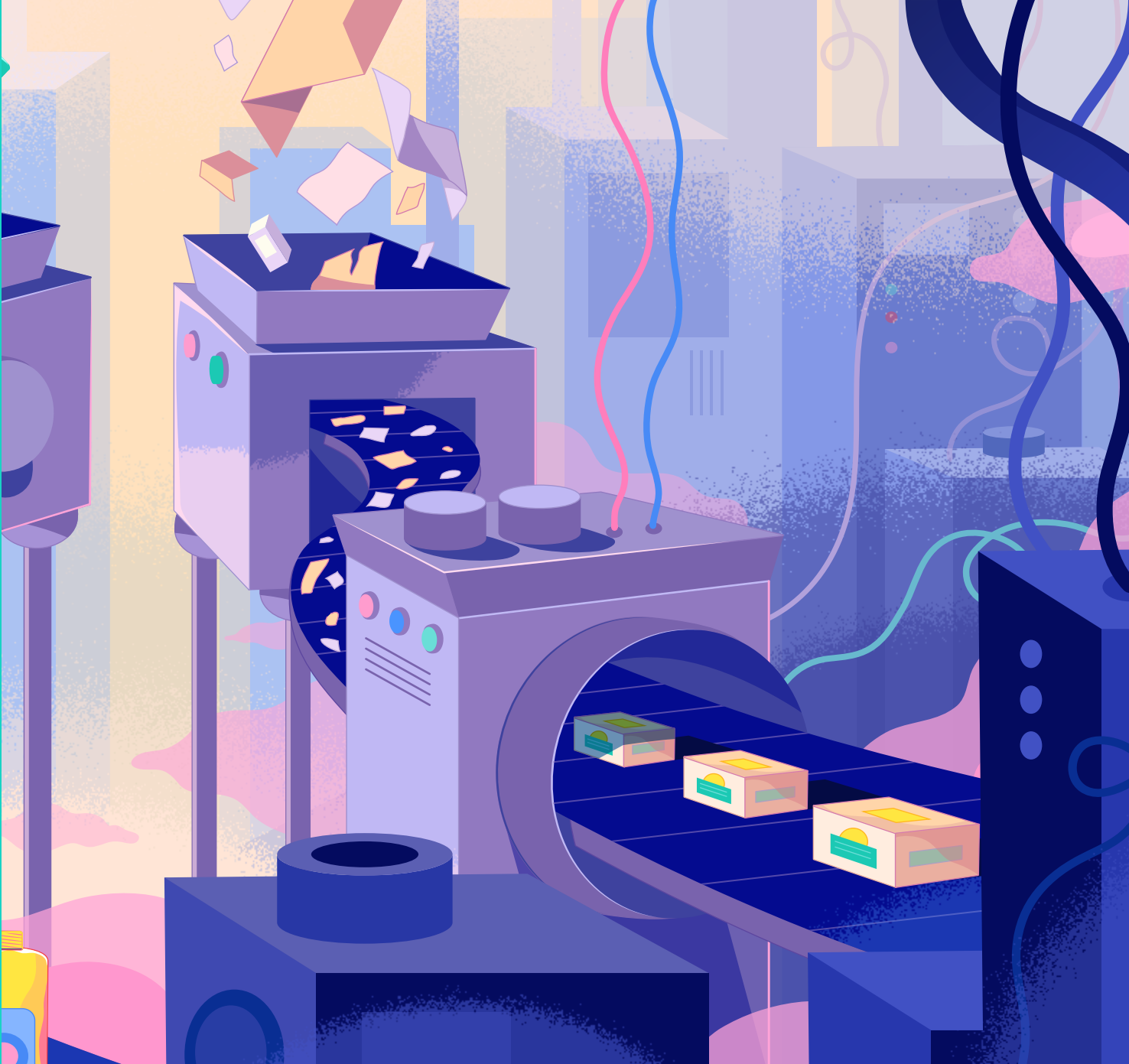
Must nots

Employees **must not**:

- Knowingly produce or distribute products, including promotional items, or services that could adversely impact employees' or consumers' health, endanger customers or adversely impact Unilever's brand reputation
- Take decisions about product safety or product quality without the authority and / or sufficient knowledge to do so
- Respond to customers or consumers about the product quality or safety of products without authorisation to do so

Countering Corruption

Integrity defines how we behave, wherever we are. It guides us to do the right thing for the long-term success of Unilever.



Avoiding Conflicts of Interest

Conflicts of interest can have a significant negative impact on the reputation and effectiveness of Unilever, its business and its people. They arise when an employee allows their actual, perceived or potential personal, financial or non-financial interests to affect their objectivity when performing their job at Unilever.

This Code Policy sets out what employees must do to prevent and to manage these situations.

A conflict of interest may arise, and disclosure is required, when an employee:

- Hires, manages, or has an influence on the workload, performance assessment, granting of approvals and / or reward of someone with whom they have a close personal relationship
- Accepts or performs a [Public Official](#) role, or has a [family member](#) or a close personal contact who is a Public Official with the ability to take decisions that could impact Unilever business
- Has a close personal interest in the business of competitors or other third parties relevant to Unilever. This includes cases where the employee, their family members or a close personal contact:
 - work for or provide any services to competitors or to any other third parties relevant to Unilever's business

- hold investments other than in publicly traded pension funds, index linked or tracker funds that represent:
 - Substantial interests in a competitor, State controlled or influenced entity, or any other third party relevant to Unilever business (5% of the net worth of any of these entities)
 - Any interest in a third party if they, or one of their team, are involved in engaging, monitoring or investigating the third party's performance
- Allows their non-financial interests such as personal values, beliefs, welfare and political views to take precedence over Unilever's lawful and ethical expectations, affecting their performance or objectivity at work
- Follow the same process if they are interested in taking up, in a personal capacity, a proposed directorship (or equivalent) of another organisation, whether commercial or not-for-profit, including roles in trade associations and roles for public bodies. This obligation extends to new joiners that hold directorships and have not disclosed them as part of the recruitment process

The above disclosure requirements excludes roles of school governors, governing positions in amateur sporting or recreational groups, and directors of property/housing blocks in which an employee lives

- Obtain written approval from the Chief Legal Officer and the Chief Business Integrity Officer, before becoming a director of any publicly listed company
- Ensure that external commitments do not:
 - Detract them from their commitment and contribution to Unilever
 - Provide access to commercially sensitive information concerning actual or potential Unilever competitors (see Code Policies on [Fair Competition](#) and [Competitors' Information](#)); and / or

- Create any liability for Unilever. The employee must inform the other organisation that they take up this position on a personal basis, with no responsibility for Unilever and that any fees or benefits that arise from their engagement are not passed on to Unilever

Must nots

Employees **must not**:

- Accept appointments, debate, vote, or participate in any decision-making process or activity when a conflict of interest exists or might arise before their Business Integrity Officer has provided clearance
- Take, or divert to others, any business opportunities that arise in the course of doing their job at Unilever that could be of interest to Unilever
- Misuse their position in Unilever to advance personal interests
- Hire, contract or engage any individual or organisation without ensuring they are free of conflict of interest with Unilever
- Hire or retain the services of former Public Officials without following Unilever's Principles on 'revolving doors'.

Musts

[Employees must](#):

- Ensure Unilever is best placed to benefit from potential business opportunities
- Follow the process outlined [here](#) to immediately disclose an actual, perceived or potential conflict of interest to their Business Integrity Officer who will determine the best way to manage the situation in consultation with the employee's Line Manager

Anti-Bribery



To support global efforts to fight corruption, most countries have laws that prohibit bribery: many apply these 'internationally' to behaviour beyond their borders. A breach of such laws may result in legal and financial consequences for Unilever and individuals. Dealings with public officials are particularly high risk: even the appearance of illegal conduct could cause significant damage to Unilever's reputation.

Unilever's commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to all Unilever operations, regardless of local business practices, and prohibits both public and commercial bribery (e.g. to or from any third party).

This Code Policy covers what employees must and must not do to meet Unilever requirements.

Musts

Employees must:

- Always make clear, internally and when dealing with third parties, that Unilever has a zero tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour to improperly influence a business outcome
- Immediately notify their Business Integrity Officer and Cluster General Counsel if they become aware of any suggested or actual payment or other transaction which has the potential to be in breach of this Code Policy
- Follow Unilever's third party compliance policies and controls in accordance with the [Responsible Sourcing and Business Partnering](#) Code Policy
- Use electronic communications or e-government solutions (in areas such as licencing, procurement, taxes, brand protection, etc) or any other means available to reduce face-to-face interactions with public officials and the connected risks of bribe solicitation

Must nots

Employees **must not** directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

- Offer or give bribes or [improper advantages](#) (including [facilitation payments](#)) to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions by any person about Unilever
- Request or receive bribes or improper advantages from any third party, which are, or give the impression that they may be, intended to influence decisions by Unilever about that third party

In exceptional situations where employees cannot escape imminent threat to their life, liberty, or physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details to their Business Integrity Officer and Cluster General Counsel in the country where the incident occurred. This is to ensure that the matter can be fully investigated, necessary financial records kept, and further steps taken where appropriate (see also Code Policy on [Accurate Records, Reporting and Accounting](#)).

Gifts & Hospitality (1 of 2)

All Unilever's relationships must reflect its ongoing commitment to doing business with integrity.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Unilever's business activities.

This Code Policy sets out responsibilities of employees in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are always prohibited. It also explains in what circumstances gifts or hospitality may legitimately be given or received.

Musts

Employees must:

- Apply this Code Policy in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest (see Code Policies on [Anti-Bribery](#) and [Avoiding Conflicts of Interest](#))
- Familiarise and observe the local monetary limits that Unilever has set separately for gifts and for hospitality, unless exempted in accordance with this Code Policy



Gifts & Hospitality (2 of 2)

Musts

Gifts

Employees **must**:

- Ensure that any gifts offered (other than Unilever branded merchandise) or received do not exceed the local monetary limits for gifts, are one-off or irregular in nature and always comply with the Code Policy on [Avoiding Conflicts of Interest](#). Although employees are not required to record such gifts centrally, they must keep their own records for inspection. All exceptions require prior clearance by their Business Integrity Officer
- Ensure that if they are offered a gift that exceeds the local monetary limits for gifts they must politely decline and explain the Unilever rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely preclude their return, employees must:
 - Obtain clearance from their Business Integrity Officer; and
 - Where appropriate take steps for the gift to be donated to charity

- Ensure that all gifts by employees that take the form of Unilever branded merchandising materials must be legitimate and proportionate

Hospitality

Employees **must**:

- Ensure that hospitality is only offered or accepted if:
 - There is a legitimate business interest in doing so
 - Its value does not exceed the local monetary limits for hospitality; and
 - It remains one-off or irregular in nature
 - It is in the form of a locally hosted meal, attendance at, or participation in an organised 'team-building' occasion, local cultural or sporting event, local industry award ceremony, business site visit or similar responsible activity
 - Usual business contacts from Unilever and other parties are physically present

Employees are not required to record such hospitality centrally, but must keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of, Unilever is approved using Unilever's standard local expense processing and clearance systems.

In exceptional circumstances where employees seek to offer or accept hospitality above the local monetary limits for hospitality, they **must**:

- Check their Line Manager supports the proposal
- Obtain clearance from their Business Integrity Officer; and
- Once approval is received, ask the third party to confirm that the offer or acceptance of such hospitality also complies with its equivalent gifts and hospitality policy

In other circumstances where employees are offered or asked for hospitality that exceeds relevant local monetary limits for hospitality they must politely decline by reference to this Code Policy.

Must nots

Employees **must not**:

- Discuss, offer or receive any gifts or hospitality activity involving public officials or their family members without prior clearance from their Business Integrity Officer
- Offer or accept any gifts or hospitality, or any other favours which are intended or might be seen to influence business decisions or create an obligation to do something in return
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from their Business Integrity Officer
- Offer or accept any hospitality that is not consistent with the Code Policy on [Respect, Dignity and Fair Treatment](#), or may cause offence under local norms and customs

All clearances from their Business Integrity Officer referred to in this Code Policy must be obtained following the gifts and hospitality disclosure process available [here](#)

Accurate Records, Reporting & Accounting

The financial reports and other information that Unilever maintains internally and the financial information it provides to shareholders, regulators and other stakeholders must be accurate and complete.

Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Procedures and processes must be in place to ensure that underlying transactions are properly authorised and accurately recorded.

Any failure to record transactions accurately, or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in fines or penalties for employees or for Unilever.

This Code Policy sets out what employees must do to ensure the accuracy of our business records and financial information.

Musts

Employees must:

- Record all transactions accurately, completely and promptly
- Only perform transactions, such as buying, selling or transferring goods/assets, for which they are authorised
- Ensure transactions they approve are legitimate and based on valid documentation
- Notify their Business Integrity Officer and the Head of Finance of any potential fraud, other misrepresentation of accounting or other information, or if a 'facilitation payment' has been paid to avoid physical danger or due to an error in judgment
- Where instructed in the context of a legal hold, retain records in accordance with Unilever's Data Retention Standard, or longer if required by local laws/regulations
- Retain records that may be relevant to any ongoing audit, litigation or regulatory investigation, even if they exceed the normal retention period if instructed to do so

- Co-operate fully, openly and honestly with internal/external auditors, tax authorities and other regulators
- Ensure they are aware of all information relevant to their work

Employees who are responsible for reporting financial and other business information **must**:

- Comply with all applicable laws, for example, those regarding financial statements, tax and environmental requirements
- Adhere to all applicable external reporting standards and regulations, such as international and national accounting standards, stock market listing standards and rules, financial regulator rules, health and safety requirements, corporate governance codes and regulatory standards
- Follow Unilever's Accounting Manual, reporting instructions and timetables, information standards and information definitions

Employees involved in accounting **must**:

- Ensure sales, profits, assets and liabilities are recorded in the correct time period

- Properly document assumptions that underpin accounting records, especially those relating to provisions, journal entries and contingent liabilities, including tax

Market Cluster/Country Heads, Finance Directors and Controllers must complete quarterly and annual Financial Reporting Declarations in line with instructions issued by Unilever Financial Group.

Must nots

Employees **must not**:

- Do anything to artificially inflate or shift sales or profit between reporting periods
- Create, maintain or procure others to produce or maintain undisclosed or unrecorded accounts, funds or assets
- Conceal, alter or falsify company records, accounts and documents

Protecting Unilever's Physical & Financial Assets & Intellectual Property



Employees are responsible for ensuring Unilever's assets are protected.

For information on the protection of several other asset types see the Code Policies on [Occupational Health and Safety](#) and [Protecting Unilever's Information](#).

This Code Policy covers the protection of physical assets and property, financial assets and intellectual property.

Musts

Physical assets/property

Employees must:

- Take care to ensure that all Unilever physical assets and property they come into contact with while working are not damaged, misused or wasted. Physical assets and property includes factory and laboratory equipment, Unilever products or components, buildings, computers and company motor vehicles

The head of each Unilever site must:

- Identify potential hazards from activities and services on site
- Evaluate the risk of damage to site assets of such hazards and of any potential business interruption or liability that could result
- Take steps to reduce identified risks to an acceptable level

Financial assets

Employees must:

- Protect Unilever's financial assets – such as cash, bank accounts and credit cards - guarding against misuse, loss, fraud or theft
- Only authorise commitments, expenditure, borrowing or other financial transactions in line with their role as specified in local, regional and / or global financial and / or treasury authority schedules
- Comply with the relevant Unilever standards when involved in hedging contracts or transactions

Intellectual property

Employees must:

- Report to Legal Group any suspected counterfeit products or any product, packaging, communication or marketing practice that are suspected of infringing our copyright, trademarks, patents, design rights, domain names and / or other intellectual property rights

- Ensure all necessary checks and filings have occurred with respect to patents, designs and trademarks or other intellectual property rights, when researching, developing or preparing to launch new brands, sub brands, services, designs, inventions, communication, advertising and promotional materials
- Ensure a contract is in place with appropriate clauses to protect Unilever's intellectual property rights and ensure freedom to use results when undertaking collaborative work with third parties

Must nots

Employees must not:

- Remove Unilever's physical assets or property from company premises without permission or use them for inappropriate purposes
- Knowingly infringe the valid patents, design rights, trademarks, copyright and other intellectual property rights of any third party

Anti-Money Laundering

To protect Unilever's reputation and avoid criminal liability, it is important not to become associated – however innocently – with the criminal activities of others. In particular, Unilever and its employees must ensure Unilever does not receive the proceeds of criminal activities, as this can amount to the criminal offence of money laundering.

This Code Policy sets out essential steps employees must take to avoid being implicated in money laundering.

Musts

Employees must:

- Immediately notify their Cluster General Counsel if they have any suspicions about actual or potential money laundering activity
- Look out for warning signs of money laundering, such as:

Supplier requests to:

- Pay funds to a bank account in the name of a different third party or outside the country of their operation
- Take payments in a form outside the normal terms of business
- Split payments to several bank accounts
- Overpay

Customer payments to Unilever:

- From multiple bank accounts
- From bank accounts overseas when not a foreign customer
- Made in cash when normally made by cheque or electronically
- Received from other third parties
- Made in advance when not part of normal terms of business

Employees involved in engaging or contracting with third parties such as new suppliers, customers and distributors **must:**

- Ensure that the third parties in question are subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening
- Determine, with guidance from their Business Integrity Officer, which tools and processes should be used to facilitate appropriate screening and record-keeping (see the [Responsible Sourcing and Business Partnering Policy](#))
- Carefully consider, where necessary in consultation with their Business Integrity Officer or General Counsel, screening outcomes before deciding whether to do business with the third party

Finance managers who support Supply Chain Management and Customer Development must regularly monitor and / or review suppliers, customers and other third-party service providers to identify business activity or governance that could indicate money laundering is taking place

Must nots

Employees **must not:**

- Simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put Unilever and its employees at risk



Respecting People

People should be treated with dignity, honesty and fairness. Unilever and its employees celebrate the diversity of people, and respect people for who they are and what they bring. Unilever wants to foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential.



The Code
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Principles

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Occupational Health & Safety

Unilever is committed to providing healthy and safe working conditions. Unilever complies with all applicable legislation and regulations and aims to continuously improve health and safety performance.

Everyone at Unilever has a role to play. Managers are responsible for cascading and implementation of the occupational health and safety of their direct reports and third parties under their control. As a condition of our employment, we all have a duty to work safely.

This Code Policy outlines our individual and shared responsibilities for health and safety.

Musts

Employees must:

- Work and behave safely
- Comply with health and safety procedures and instructions relevant to their work and / or about which they have been trained or notified
- Support team leaders to ensure that everyone they work with, including contractors and visitors, are familiar with and follow applicable health and safety procedures and instructions

- Only undertake work that they are trained, competent, medically fit, sufficiently rested and alert enough to do
 - Make sure they know what to do if an emergency occurs at their place of work / on the road or at a location they are visiting
 - Promptly report to local Unilever management any actual or near miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to correct, prevent or control those conditions immediately
- All **Unilever team leaders** have overall operational responsibility for health and safety at their location and **must:**
- Establish and maintain an appropriate health and safety at work management system for their sites and their teams, including the appointment of committees, managers, competent experts and a system for gathering employees' concerns/input
 - Identify health and safety hazards and manage/control risks arising from their team and their site's routine and planned operations, activities and services
 - Regularly review and comply with all applicable local health and safety legislation, including relevant mandatory Unilever requirements
 - Develop site and role specific health and safety improvement objectives and monitor performance, including an annual review of the management system's effectiveness and adequacy
 - Report mandatory Key Performance Indicators (KPIs) via Unilever's Safety, Health and Environment (SHE) reporting system
 - Report all incidents, accidents and near misses in line with reporting requirements, including thorough investigation, follow-up and communication of lessons learned
 - Maintain, communicate and test both site and role emergency plans
 - Ensure all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities

This Code Policy is shared globally through our local SHE team members who work closely with their local leadership teams. In countries where directors of the local legal company/entity must take responsibility for health and safety matters for all national premises in order to meet legal regulatory requirements, Unilever premises leaders must liaise with the relevant board of directors to agree the health and safety at work management system and the approach required to ensure appropriate ongoing review.

Must nots

Employees **must not:**

- Undertake work or related activity, such as driving, when under the influence of alcohol or drugs, or when using medication improperly
- Carry on with any work that becomes unsafe or unhealthy
- Assume someone else will report a risk or concern

Respect, Dignity & Fair Treatment (1 of 2)

Business can only flourish in societies where human rights are respected, upheld and advanced. Unilever recognises that each business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

There is both a business and a moral case for ensuring that human rights are upheld across Unilever's operations and value chain. Unilever is committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, and no unlawful discrimination or victimisation.

This Code Policy sets out what employees must do to ensure that all workplaces maintain such an environment.

Musts

Employees must:

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit

Line Managers must:

- Ensure all employees' work is conducted on the basis of freely agreed and documented terms of employment, clearly understood by and made available to relevant employees and others working for Unilever
- Ensure that all employees have obtained employment with Unilever without the employee having paid a recruitment fee or related cost directly or indirectly as guided by the International Labour Organisation standards



Respect, Dignity & Fair Treatment (2 of 2)

Musts

- Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and adhered to. Other than legally mandated deductions, all other deductions from wages require the express and written consent of the employee
- Respect employees' rights to form and join a legally recognised union of their choice or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions, labour management relations and matters of mutual concern, to the extent practicable taking national laws into consideration
- Comply with local legal requirements in relation to short-term, casual or agency employees
- Maintain a clear and transparent system of employee and management communication that enables employees to consult and have an effective dialogue with management
- Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity

Must nots

Employees **must not**:

- Engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views
- Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumours
- Work more than the regular and overtime hours allowed by the laws of the country where they are employed. All overtime work will be on a voluntary basis

Line Managers **must not**:

- Use, or permit to be used, forced or compulsory or trafficked labour. We have a zero tolerance of forced labour
- Use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher
- When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are permitted), require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to attend school

Safeguarding Information

Information is essential to our success: it fuels our research, keeps us in touch with consumer needs and helps us work effectively together. If used inappropriately, information can cause considerable damage to our business.



Protecting Unilever's Information



Information is one of Unilever's most valuable business assets: Unilever is committed to safeguarding and protecting our information and any other information entrusted to us.

Information within Unilever is held in many different formats, including on paper, electronically in documents or in IT applications & systems. Our requirements to protect information apply to all formats. Unilever has Information Classification & Information Handling standards which define how information within Unilever must be classified, handled and protected.

Musts

When handling Unilever's information employees must:

- Understand the nature and classification of the information, as defined in the Information Classification Standard; understand and adhere to the handling requirements detailed in the Information Handling Standard; and take personal responsibility for the proper use, circulation, retention, protection and disposal of Unilever's information

- Only distribute or share Unilever's information on a need to know basis, ensuring that only employees or others working for Unilever, or authorised third parties, with a genuine business need, have access to the information
- Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices away from the workplace
- Comply with the proper use of Unilever Information Technology and only share Unilever information using Unilever-approved Information Technology in accordance with the Code Policy on [Use of Information Technology](#)
- Immediately report events which could impact the security of Unilever information by following the Information Security reporting procedures. This includes, but is not limited to, clicking links or attachments in suspicious emails, inadvertently sharing confidential information with the wrong recipient or any other relevant events

Must nots

Employees **must not**:

- Disclose Unilever's information externally to third parties unless in accordance with Unilever's Information Classification & Information Handling standards
- Use Unilever's information for anything other than a legitimate business purposes or as required by law.

Personal data relating to employees, consumers and other individuals is subject to specific laws and regulations in most countries and requires special handling. Additional information relating to the classification and protection requirements for personal and sensitive personal data can be found in the Code Policy on [Personal Data and Privacy](#)

If in doubt about how to handle any Unilever information, restricted or otherwise, employees must seek advice from their Line Manager, Business Information Security Officer and / or Legal Business Partner

Preventing Insider Trading

Employees must not use inside information to buy or sell securities of Unilever PLC, Unilever N.V. or any listed Unilever subsidiary, or any other publicly traded company. Securities include shares, equities and related derivatives or spread bets.

Unilever's Disclosure Committee – on behalf of the Board – oversees that Unilever has the necessary procedures in place to ensure Unilever complies with applicable insider trading laws and regulations (see Unilever's Share Dealing and Disclosure Manuals).

This Code Policy explains what insider trading is, how employees can be sure they don't engage in it, and what to do if they discover inside information is being misused.

Trading or encouraging others to trade on inside information, or giving it to unauthorised parties, is a criminal offence in many countries: a breach of the applicable laws can lead to fines and / or imprisonment. Inside (or price sensitive) information means information that is not available to the public and that a reasonable investor would probably consider important in deciding whether to buy or sell a company's shares. Examples of inside information include the following:

- Business results or forecasts for the whole company or for one of our listed subsidiaries
- A major new product, product claim or product incident/issue
- An acquisition, merger or divestment
- A sizeable restructuring project
- Major developments in litigation cases or in dealings with regulators or governments
- Revisions in dividend policy
- Changes in executive directors.

Unilever Insiders

Unilever maintains Insider Lists that name all employees and external advisors who have authorised access to Unilever's inside information (individuals will be notified by the Corporate Secretaries' Department if they have Unilever Insider status).

In addition to the general obligations set out above, individuals on the Insider Lists must also comply with the requirements in Unilever's [Share Dealing](#) and [Disclosure](#) Manuals.

Musts

Employees must:

- Refer to Unilever's Share Dealing and Disclosure Manuals or contact the Corporate Secretaries' Department in the Legal Group, to check whether something is inside information
- Immediately advise a member of the Disclosure Committee (the Corporate Secretaries' Department holds the names of committee members) if they suspect or know that some inside information is not being managed as inside information

Must nots

Employees **must not:**

- Buy or sell securities of any listed company when in possession of inside information related to those securities – even if they believe they are not relying on it. This includes trading at times when there are market rumours that they know are false
- Encourage anyone to buy or sell securities of any listed companies when they have inside information related to those securities – even if they do not profit from the arrangement
- Pass inside information relating to Unilever to anyone within Unilever (unless they are on a relevant Unilever Insider List) or outside Unilever, including family members or friends (see the Code Policy on [Protecting Unilever's Information](#))
- Spread false information or engage in other activities to manipulate the price of publicly listed securities

Competitors' Information



To promote fair competition Unilever gathers and uses competitor's information that is in the public domain, for example, from newspapers, the internet and company filings. This provides Unilever with valuable insights and helps us achieve our purpose of making sustainable living commonplace, and our vision that being a purpose-led, future-fit company will deliver superior performance.

This Code Policy outlines what employees and others working for Unilever must do to legitimately obtain and use competitor information and at the same time respect the confidentiality of competitor's information.

Unilever respects the confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public domain, has value and could be used for commercial benefit. Accepting or using competitor's confidential information risks being a serious infringement of competition laws and/or trade secrets/intellectual property laws, leading to significant penalties for Unilever and individuals.

Competitor information encompasses many areas from marketing and financial information to Intellectual Property such as 2D and 3D designs. If you are in any doubt consult your Legal Business Partner.

Musts

Employees must:

- Only gather and use competitors' information from the public domain
- Ensure the information is from a legitimate source and document the source
- Keep up to date with training and the latest policies on obtaining competitor information
- Clearly record the sources of data in all communications so their legitimacy is beyond doubt
- If they acquire a [competitor's confidential information](#) unintentionally, they must notify their Legal Business Partner immediately

Must nots

Employees **must not:**

- Seek to obtain competitor's confidential information from new employees or otherwise

Personal Data & Privacy

Unilever respects the privacy of all individuals including employees and consumers and their personal data, including digital information Unilever holds about them. We will collect and use personal data in accordance with our values, applicable laws and with respect for privacy as a human right.

This Code Policy sets out what steps employees must take to ensure personal data is handled appropriately.

Musts

When collecting, using or storing personal data **employees must:**

- Only collect data that is adequate and relevant and use it solely for the purpose for which it is collected
- Be transparent with individuals in relation to how their personal data is used in alignment with Unilever privacy notices
- Obtain consent from individuals in accordance with local law
- Keep personal data up to date correcting inaccurate information when requested and respecting individual legal rights
- Keep personal data confidential and secure
- Act responsibly and ethically, upholding Unilever's core values, always considering the risk to individuals in using their personal data and take steps to mitigate such risk

Must nots

When collecting, using or storing personal data, employees **must not:**

- Retain personal data for longer than necessary to achieve the business objective or meet minimum legal requirements
- Transfer personal data outside the country in which it is collected without advice from their Legal business partner, as there may be legal restrictions/ requirements relating to the transfer
- Collect and use personal data for purposes that are not reasonably expected by our consumers and employees

If in doubt, employees must seek advice from their line manager and / or Legal business partner.



Use of Information Technology (1 of 2)



This Code Policy explains how employees should use Unilever equipment and systems, or personal devices to access information at Unilever, responsibly and securely in compliance with all relevant laws and regulations

[Employees](#) are provided with access to Unilever systems and equipment to carry out their role.

Employees are permitted to use Unilever Equipment for personal use if this does not cause material impact to Unilever. Material impact includes excessive storage, network usage, mobile data usage, or voice utilisation which may have an impact on the performance of the environment.

All Unilever business information processed by or stored on Unilever or personal systems and equipment is not private and may be monitored, inspected or removed by Unilever, regardless of whether it is work-related or 'personal'.

Unilever may log, diagnose and assess activity on Unilever systems and equipment to the extent permitted by law, to ensure this policy is being followed and Unilever's technical environment is optimised.

Use of Information Technology (2 of 2)

Musts

When using Unilever's Systems and Equipment, employees **must**:

- Ensure Unilever equipment is used appropriately and protected from damage, loss or theft
- Use a password or PIN to lock unattended Unilever equipment, or any personal device used to access Unilever information
- Immediately report to the IT Service Desk the loss or theft of any Unilever equipment, or any personal device used to access or store Unilever Information
- Ensure any removable Unilever IT equipment is secured when left in the office overnight, is locked away or put out of sight when left unattended at home, in a hotel or in a vehicle. When travelling, keep it with you at all times
- Comply with copyright law and respect all applicable licenses for any graphics, documents, media and other materials stored on or accessed with Unilever systems or equipment
- Follow the appropriate IT request process to install any software or applications on their Unilever equipment

Must nots

Employees **must not**:

- Try to disable, defeat or circumvent Unilever security controls, including but not limited to firewalls, browser configuration, privileged access, anti-virus and the deletion of system logs
- Use Unilever systems or Unilever equipment to intentionally access, store, send, post or publish material that is:
 - Pornographic, sexually explicit, indecent or obscene, or
 - Promotes violence, hatred, terrorism or intolerance, or
 - Is in breach of local, national or international laws
- Use Unilever systems or Unilever equipment to intentionally defame, slander or lower the reputation of any person or entity or their goods or services
- Expose Unilever information by:
 - Using non-public Unilever information for anything other than Unilever business
 - Forwarding emails containing non-public Unilever information to personal email accounts
 - storing or synchronising Unilever information from personal devices
 - Sharing their Unilever access credentials with anyone else, including work colleagues (unless formally approved by Information Security), friends and family
 - Using their Unilever password for non-Unilever IT Systems
 - Using their Unilever email address for non-business related websites or online activity
 - Intentionally accessing Unilever Systems or Unilever Information that is not intended for them
- Run or engage in any form of private business using Unilever IT equipment
- Access Unilever Systems or Information after leaving Unilever employment

Engaging Externally

Throughout our value chain, from innovation through to our consumers, Unilever and its employees need to demonstrate the same ethical standards when engaging with others externally as when dealing with colleagues.



Responsible Marketing

Unilever is committed to developing, producing, marketing and selling all its products and services responsibly. Unilever can and should conduct marketing activities in line with societal expectations.

This Code Policy sets out global minimum standards that apply to all of Unilever's marketing activities everywhere.

This covers but is not limited to: brand names, packaging and labelling; consumer planning and market research; trade advertising; sales materials; brand merchandising and sponsorship; all forms of advertising including television, radio, print, digital media, promotional activities and events, product placements, 'advergaming' – whether created by Unilever, agencies, crowdsourcing or other third parties.

Musts

Employees who are involved in Unilever marketing activities **must**:

- At all times, respect applicable marketing laws
- Describe our products/services and their effects truthfully, accurately and transparently, with appropriate factual and, where relevant, nutritional information
- Ensure there is sufficient information for consumers and customers to understand how to use our products and services
- Ensure our marketing is based on adequate support for the claims Unilever makes
- Comply with our principles and standards on marketing, including (but not limited to) those with respect to children, women and social media
- Be mindful of the environmental implications of marketing activity, in such areas as new product development, marketing activation plans, packaging and content recycling



Freedom of choice

Employees involved in Unilever marketing activities must show respect for people who choose not to buy our products and services, and ensure there is sufficient information about our products and services for consumers to make informed choices

Taste and decency

Employees involved in Unilever marketing activities must ensure our marketing reflects and respects generally accepted contemporary standards of good taste and quality, in the context for which it is designed, showing awareness of both wider society and sensitivity to different cultural, social, ethical and religious groups.

Must nots

Employees **must not**:

- Alter images used in marketing communications in such a way that advertising is rendered misleading
- Misuse technical data or use scientific terminology or vocabulary in such a way as falsely to suggest that a claim has scientific validity
- Associate our products or services with, or feature within any Unilever marketing, themes, figures or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability or minority group
- Advertise in any media known for promoting violence, pornography or insulting behaviour

Responsible Sourcing & Business Partnering

As a purpose-led company, Unilever is committed to doing business in a manner that improves the lives of workers across our value chain, their communities and the environment. Unilever expects its suppliers and business partners to adhere to values and principles consistent with our own.

This Code Policy sets out responsibilities of employees who engage with third parties.

Our requirements for third parties are set out in the [Responsible Sourcing Policy \(RSP\)](#) for suppliers and in the [Responsible Business Partner Policy \(RBPP\)](#) for distributors, customers and other partners subject to the RBPP.

Unilever could face legal and reputational liabilities if third parties fail to comply with these requirements.

The RSP and RBPP outline the fundamental principles and mandatory requirements that third parties must meet.

Teams responsible for setting the standards of these policies are Integrated Social Sustainability (Supply Chain) for the RSP and Customer Development for the RBPP.

Musts

[Employees](#) who contract and / or work with Unilever's third parties **must**:

- Read and understand the RSP or RBPP policies and consult their Line Manager and / or the relevant responsible teams if they have any questions
- Ensure that all our third parties are subject to our RSP or RBPP policies and controls. This includes adequate and timely onboarding, contracting and monitoring (including verification and remediation where necessary)
- Ensure that all our agreements with suppliers (inclusive of MSAs, UPAs, CTCs, POs*) and distributors and customers (including DOs*), to the extent required by our internal controls, include contract clauses that specify that the supplier must acknowledge adherence to our RSP or RBPP as a condition of engagement
- Notify their Line Manager and the relevant responsible team if they know or suspect that third parties are not meeting relevant RSP or RBPP requirements or if they are performing contrary to the agreed contractual terms
- Ensure that any selection, shortlisting or tendering processes for new third parties consider their compliance with the RSP or RBPP

Must nots

Employees who contract and / or work with Unilever's third parties **must not**:

- Agree to any contractual changes or exclusions with respect to the RSP or RBPP without consulting their Legal Business Partner and in respect of the RSP, prior written authorisation from the Integrated Social Sustainability function
- Continue transacting with third parties that have been declared as not compliant with the RSP or RBPP unless a dispensation or exemption is provided, or when they have been identified on the Prohibited Third Parties list



*Footnote: Master Service Agreements, Unilever Purchase Agreements, Commercial Terms Contracts, Purchase Orders, Distribution Orders.

Fair Competition (1 of 2)



Investigations by competition authorities may result in significant fines and costs, compensation claims by our customers and competitors, and damage to our reputation and commercial relationships. Criminal sanctions for individuals may also apply.

Competition laws prohibit:

- Anticompetitive agreements
- Sharing of commercially sensitive information between competitors, unless approved by Legal
- Certain restrictions imposed on or agreed with distributors and other customers; and
- Abuses of dominant market positions.

This Code Policy sets out what employees must do to ensure Unilever upholds fair competition.

Co-operating with competition authorities

Unilever co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contacts with competition authorities (including, where relevant, national courts) are co-ordinated by the relevant Legal Business Partner. For more details, see the Code Policy on [Contact with Government, Regulators & Non Governmental Organisations \(NGOs\)](#).

Musts

Market Cluster/country, Category and Function Heads must, with the support of Legal, ensure that the requirements of competition law are understood by employees, contractors and agents operating in their categories, markets and functions, by providing appropriate documentation, communication and training, with tailored programmes for specific (in particular 'high risk') groups.

Employees must:

- Comply with competition law for all categories and markets in which they operate and undertake all relevant training

Fair Competition (2 of 2)

Musts

- Before taking part in a trade association or industry event, ensure all mandatory requirements set out in the Unilever Standard on Trade Association Memberships have been complied with; this also applies to less formal meetings or events that involve competitors, such as awards ceremonies or associated social contacts
- Object immediately if inappropriate topics are raised during any contact with competitors and leave immediately – and noticeably – if any inappropriate discussion continues
- Report incidents of inappropriate discussions immediately to their Legal Business Partner
- Promptly seek advice from their Legal Business Partner:
 - Whenever you need help applying the competition rules laid out in this Policy to any specific business situation, and in any case of doubt
 - In situations which may involve the exchange of information with a competitor
- Before discussing joint purchasing arrangements, or production, research and development, and standardisation agreements with any competitors
- When contemplating restrictions on the commercial activity of a customer or a distributor
- In situations where Unilever might have a strong market position and Unilever's commercial practices could be perceived as unfair to customers or competitors
- Clearly record sources of competitor information in all communications and documents so their legitimacy is beyond doubt

Must nots

Unilever prohibits participation in cartels in all countries, even those that do not have competition law.

Employees **must not**:

- Participate in cartels
- Discuss, agree or exchange information about, any of the following, directly or indirectly, with competitors (unless approved by Legal Group):
 - The price or terms of sale for products and / or services
 - The price or terms to be demanded from suppliers
 - The co-ordination or allocation of bids or quotes
 - Limitations on production or sales; or
 - The division or allocation of geographic markets, customers or product lines
- Boycott or refuse to deal with certain competitors, customers or suppliers without first seeking advice from their Legal Business Partner
- Impose restrictions on the commercial activity of a customer or a distributor without first seeking advice from their Legal Business Partner, including control of the resale price, the territory or channels in which they may resell Unilever products and the extent to which they may sell competing products
- Where Unilever has a strong market position, conduct itself in order to take unfair advantage of customers or unfairly prevent competitors from entering, remaining or expanding in a market, e.g. selling below cost, certain types of conditional rebates, exclusivity arrangements

Contact with Government, Regulators & Non-Governmental Organisations (NGOs) (1 of 2)



Any contact by employees or other representatives with government, legislators, regulators or NGOs must be done with honesty, integrity, openness and in compliance with local and international laws.

This Code Policy provides detailed guidance on how contact with the above authorities must proceed. It does not cover interactions about purely personal matters, such as personal charitable donations or personal tax.

Governments, regulators and legislators includes bodies that may be: global or international (e.g. United Nations); regional (e.g. European Union, ASEAN); national; or active at a local community level. Non-Governmental Organisations (NGOs) also operate at different levels, and their work includes social and consumer issues as well as environmental ones.

Interaction with these organisations must only be made by authorised and appropriately trained individuals. This covers all forms of communications, whether formal, informal or social interaction in relation to Unilever business including any kind of correspondence such as in-person, electronic media or written correspondence.

Contact with Government, Regulators & Non-Governmental Organisations (NGOs) (2 of 2)

Musts

Employees must:

- Be appropriately trained and authorised by their Line Manager
- Be courteous, open and transparent in declaring their name, company, role, status and, for any enquiry or 'representation', the nature of the subject matter
- Take all reasonable steps to ensure the truth and accuracy of their information
- Keep a record of contacts and interactions with authorities at our own initiative

- Seek prior approval when contacting officials to **represent our legitimate interests** as follows;
 - Global/international organisations = Global Head of Regulatory Affairs, Global Head of Communications & Corporate Affairs or Global Head of Sustainability;
 - Regional organisations = Global Head of Communications, Markets or relevant Cluster External Affairs/ Regulatory Affairs Head;
 - National or local organisations = National Head of External Affairs/ Regulatory Affairs Head. If employees do not have such departments in their location, they must get approval from cluster head of Function or National Managing Director/Head of Operations.
- Where appropriate, obtain clearance on a standing basis as a requirement of their role, for example, employees from regulatory affairs, communications and advocacy

- Have prior approval from the local Finance Director, General Counsel or Corporate Tax Department, Group Controller or Corporate Pensions Department for any contact relating to taxation, financial reporting, accounting, pension or legal matters
- Have prior approval from Regulatory Affairs (which will in turn liaise with legal group) before any **contact with regulators** about Unilever's actual or planned use of products and / or ingredients
- Have prior approval from the local communications department before any **contact with NGO's**
- Be aware of the up to date procedures communicated by site leaders for responding to unannounced inspections from relevant authorities. This must include the nomination of Responsible Persons to lead the response for each type of potential inspection.

Must nots

Employees must not:

- Attempt to obstruct the collection of information, data, testimony or records by authorised investigators or officials
- Say or do anything that may, or may be perceived as seeking to, improperly influence decisions about Unilever by any government, legislators, regulators or NGOs (see the Code Policies on [Gifts & Hospitality](#) and [Anti-Bribery](#))



Political Activities & Political Donations



Unilever companies are prohibited from supporting or contributing to political parties or candidates. Employees can only offer support and contributions to political groups in a personal capacity.

This Code Policy sets out how employees must manage their business relationship with political groups.

Approval will only be given where the non-party-political nature of the activity has been publicly communicated as such by the advisory group, its work relates to areas supporting Unilever's corporate vision, and the group includes representatives from a broad range of organisations, such as well-known peer companies, national charities, non-political think-tanks, research organisations and representatives of academia, or similar such bodies.

Musts

Employees must:

- Ensure any contributions towards, and support for, political parties are clearly personal and give no impression of being connected to Unilever
- Ensure any personal political support or contributions do not affect their performance or objectivity at work (see the Code Policy on [Avoiding Conflicts of Interest](#))
- Ensure where employees represent Unilever in social or economic advisory groups set up by governments, their participation is subject to the prior approval of the head of communications

Must nots

Employees **must not:**

- Create a conflict of interest through their involvement in the type of social or economic advisory groups mentioned above. (see the Code Policy on Avoiding Conflicts of Interest)

External Communications – The Media, Investors & Analysts



Communication with investment communities – including shareholders, brokers and analysts – and the media must be managed carefully. Such communication has important legal requirements and demands specialist skills and experience. Only individuals with specific authorisation and training/briefing may communicate about Unilever with investment communities or the media, or respond to their enquiries or questions.

Unilever's Disclosure Committee – on behalf of the Board – is responsible for ensuring Unilever has the necessary procedures to comply with relevant laws and regulations including Unilever's Disclosure & Share-Dealing Manuals.

This Code Policy outlines how communication with investment communities and the media must operate.

Musts

Employees who have received authorisation to communicate with investment communities or the media from the Investor Relations or Media Relations functions or a Board Member **must:**

- Comply with any conditions attached to their authorisation, such as constraints on when and / or with whom they may communicate
- Always consult with the authorising functions about the content of any message before they communicate

Employees who are part of the Investor Relations or Media Relations functions must follow Unilever's [Share Dealing](#) and [Disclosure](#) Manuals and the departmental processes and procedures (including authorisations) in this area

The above rules also apply outside formal work settings, such as at external speaking engagements, courses, seminars, trade association events or social occasions.

Must nots

Employees who are not part of the Investor Relations or Media Relations functions or a Board Member **must not:**

- Communicate with investment communities or the media, either on or off the record, without authorisation from one of these functions and appropriate training/briefing
- Respond to enquiries from investment communities or the media: all enquiries must be directed to the Media Relations or Investor Relations functions
- Get drawn into conversations, answer any questions or provide any information or opinion
- Make any forward-looking financial statements or provide 'inside information' (see the Code Policy on [Preventing Insider Trading](#) and the Media Relations Protocol)

Glossary



The Code
of Business
Principles

Countering
Corruption

Respecting
People

Safeguarding
Information

Engaging
Externally

Glossary

Glossary

Code Support Line

Confidential online and telephone service, allowing the user to raise a concern about an actual or potential breach of the Code or Code Policies, to ask a question if clarification is needed and to check back on the status of a concern raised or a question asked. The service is available at www.unilevercodesupportline.com

Competitor's confidential information

Non-public information about a competitor's product or the way in which a competitor carries out its business. Confidential information covers a broad sweep of activities, including current or future prices; pricing terms (e.g. discounts); buying prices, costs and supplier information business or financial strategies and plans (e.g. mergers, acquisitions and divestments); marketing, promotional and sales plans; financial results before any formal announcement; R&D work (strategies, designs, formulae, drawings, technical information, manuals and instructions, product specifications and samples of products that have not been launched or revealed publicly); and proprietary software.

Employee

A person employed by Unilever under one of a variety of contracts. The term covers all employees, whether full-time, part-time, fixed-term, permanent or trainees.

Additionally, in this document, the term is used to cover other persons working for Unilever as follows: those with a statutory Director role or equivalent responsibilities; Unilever employees of joint ventures; and employees of new acquisitions.

Facilitation payment

Unofficial payment – in effect a bribe – made to a public official to secure or speed up the performance of a routine action that the official is required to provide anyway. Facilitation payments are illegal in most countries, although a small number provide exceptions in certain circumstances. Also referred to as a 'facilitating', 'speed' or 'grease' payment.

Family member

A relative, by blood or by marriage (or similar informal relationship), notably a spouse, live-in partner, parent or child. The term includes sibling, step- or adopted child, step-parent, grandparent, uncle, aunt, cousin, grandchild or any relative who has lived with you for the past 12 months or more.

Improper advantages

The offer or gift of anything of any value, including nominal cash amounts, which may be perceived as intended to cause the recipient to behave contrary to customary ethical expectations. Includes money, services (including favours), discounts, use of resources, loans, credit, the promise of future advantages (including future employment or internships), and gifts or hospitality.

Public official

An officer, employee or representative of a State or a State controlled or owned entity. Term includes a person representing a political party or public international organisation, members of royal families or a candidate for political, municipal or judicial office. Also covers anyone acting in an official capacity on behalf of any of the above, including the police and armed forces.

Unilever

The expressions 'Unilever' and 'Unilever companies' are used for convenience and mean the Unilever Group of companies comprising Unilever N.V., Unilever PLC and their respective subsidiary companies. The Board of Unilever means the Directors of Unilever N.V. and Unilever PLC.



Unilever

UNILEVER RESPONSIBLE SOURCING POLICY

WORKING IN PARTNERSHIP
WITH OUR SUPPLIERS

2017 | ENGLISH VERSION

INTRODUCTION

Partnerships based on responsible sourcing strengthen our supply chain and the businesses within it. They help us mitigate risk and build trust among consumers and stakeholders.

Unilever's Responsible Sourcing Policy (RSP) was updated in 2017 to reinforce our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all parties. The RSP is instrumental in ensuring we deliver our business objectives while making a positive social impact on the lives of millions of people in our supply chains around the world and reducing our environmental impact. These ambitions are at the core of our Unilever Sustainable Living Plan (USLP).

The RSP includes a set of Mandatory Requirements which all our suppliers need to meet to be able to do business with Unilever. Beyond this, we encourage our suppliers to move from the Mandatory Requirements, to Good Practice, and onwards to Best Practice – Unilever is committed to work with our suppliers on this journey of continuous improvement.

We strongly believe that this journey will benefit both Unilever and our supplier partners – by helping communities and the environment flourish, we create the right conditions for sustainable business growth.

Dhaval Buch
Chief Procurement Officer

Marcela Manubens
*Global Vice President
Integrated Social Sustainability*



UNILEVER RESPONSIBLE SOURCING POLICY



THE FUNDAMENTAL PRINCIPLES

Every aspect of this policy is focused on achieving and upholding the Fundamental Principles, which are both the foundation and vision to realise our responsible business ambitions. As we work with suppliers who share and commit to these Principles, within their own business and across their extended supply chain, we will be able to effect change.

The Principles are not a Unilever 'creation'. They are anchored in internationally recognised standards.

We endorse the UN Guiding Principles on Business and Human Rights and are embedding them throughout our operations. In line with the Fundamental Principles, we base our Human Rights commitment on the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises and resulting commitments to compliance with applicable laws, and to fighting corruption in all its forms.

The same approach is reflected in our other third party compliance materials, notably our Responsible Business Partner Policy.

EVALUATION AND ASSESSMENT

The 2017 Unilever Responsible Sourcing Policy (RSP) updates our previous 2014 Unilever Responsible Sourcing Policy. Unilever will verify alignment to and implementation of the RSP's Mandatory Requirements through the use of supplier self-declaration, online assessments and – for designated high-risk countries and supplier types – independent verification including third-party audits.

The implementation process will encompass a process suitable for small businesses as well as large businesses with well-established compliance programmes.

THE FUNDAMENTAL PRINCIPLES ARE:

1. **Business is conducted lawfully and with integrity**
2. **Work is conducted on the basis of freely agreed and documented terms of employment**
3. **All workers are treated equally and with respect and dignity**
4. **Work is conducted on a voluntary basis**
5. **All workers are of an appropriate age**
6. **All workers are paid fair wages**
7. **Working hours for all workers are reasonable**
8. **All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively**
9. **All workers' health and safety are protected at work**
10. **All workers have access to fair procedures and remedies**
11. **Land rights of communities, including indigenous peoples, will be protected and promoted**
12. **Business is conducted in a manner which embraces sustainability and reduces environmental impact**

UNILEVER RESPONSIBLE SOURCING POLICY



CONTENTS

Unilever strives to conduct its operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees. We similarly respect the legitimate interests of those with whom we have relationships. Our reputation is an asset, as valuable as our people and our brands. We expect the highest standards of behaviour from all our employees, suppliers, their workers and those with whom we do business. By becoming a supplier, you are stating that you share the values embodied in the Fundamental Principles.



SECTION 1

MANDATORY REQUIREMENTS FOR DOING BUSINESS WITH UNILEVER

UNILEVER RESPONSIBLE SOURCING POLICY



MANDATORY REQUIREMENTS FOR DOING BUSINESS WITH UNILEVER

In this section, we describe the Mandatory Requirements relevant to each of the Fundamental Principles which our suppliers must achieve to establish and maintain a business relationship with Unilever.

We require all suppliers who work with or for Unilever to respect and comply with these Mandatory Requirements.



1.

BUSINESS IS CONDUCTED LAWFULLY AND WITH INTEGRITY

Compliance with Laws

All laws and regulations are complied with in the countries in which the supplier operates. All other applicable international laws and regulations are complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and anti-trust/competition laws.

Bribery

There is a prohibition on any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the supplier.

Conflicts of Interest

All and any conflict of interest in any business dealings with Unilever, of which the supplier is aware, will be declared to Unilever to allow Unilever the opportunity to take appropriate action. Any ownership or beneficial interest in a supplier's business by a government official, representative of a political party or a Unilever worker are declared to Unilever prior to any business relationship with Unilever being entered into.

Gifts and Hospitality

Any business entertaining or hospitality with Unilever is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Unilever's decisions about how Unilever awards future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.

Confidential and Competitor Information

All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempt is made to divulge to Unilever any information about its competitors. Likewise, Unilever's confidential information must not be shared with any third party unless expressly permitted by Unilever.

Financial Records, Money Laundering and Insider Trading

All business and commercial dealings are transparently performed and accurately recorded in the supplier's books and records. There is no actual or attempted participation in money laundering. No confidential information in the supplier's possession regarding Unilever is used to either engage in or support insider trading.

UNILEVER RESPONSIBLE SOURCING POLICY



Safeguarding Information and Property

Unilever's confidential information, know-how and intellectual property is respected and safeguarded. All information provided by Unilever that is not in the public domain is deemed confidential and it is only used for its intended and designated purpose. All and any personal information about individuals, such as Unilever's consumers or employees, is handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

Product Quality and Responsible Innovation

Products and services are delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use. Research and development are conducted responsibly and based on good clinical practice and generally accepted scientific, technological and ethical principles.

Reporting Concerns and Non-retaliation

All workers (whether directly employed or not) are provided with means by which to raise their concerns about any of these requirements and processes are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.



2.

WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED AND DOCUMENTED TERMS OF EMPLOYMENT

All workers, both permanent and casual, are provided with employment documents that are freely agreed and which respect their legal and contractual rights.



3.

ALL WORKERS ARE TREATED EQUALLY AND WITH RESPECT AND DIGNITY

All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.



4.

WORK IS CONDUCTED ON A VOLUNTARY BASIS

Under no circumstances will a supplier use forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms. Mental and physical coercion, slavery and human trafficking are prohibited.

UNILEVER RESPONSIBLE SOURCING POLICY



15+ 5. ALL WORKERS ARE OF AN APPROPRIATE AGE

Under no circumstances will a supplier employ individuals under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.

6. ALL WORKERS ARE PAID FAIR WAGES

All workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

7. WORKING HOURS FOR ALL WORKERS ARE REASONABLE

Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis.

8. ALL WORKERS ARE FREE TO EXERCISE THEIR RIGHT TO FORM AND/OR JOIN TRADE UNIONS OR TO REFRAIN FROM DOING SO AND TO BARGAIN COLLECTIVELY

The rights of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.

9. ALL WORKERS' HEALTH AND SAFETY ARE PROTECTED AT WORK

A healthy and safe workplace is provided to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.

10. ALL WORKERS HAVE ACCESS TO FAIR PROCEDURES AND REMEDIES

All workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.

UNILEVER RESPONSIBLE SOURCING POLICY



11.

LAND RIGHTS OF COMMUNITIES, INCLUDING INDIGENOUS PEOPLES, WILL BE PROTECTED AND PROMOTED

The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.



12.

BUSINESS IS CONDUCTED IN A MANNER WHICH EMBRACES SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT

Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment.





SECTION 2

REPORTING ON BREACHES

UNILEVER RESPONSIBLE SOURCING POLICY



REPORTING ON BREACHES

1. Any failure to comply with this Policy (including any failure by a worker of Unilever or anyone acting on behalf of Unilever) of which the supplier is aware should be reported to Unilever as soon as possible. Failure to do so will be a breach of this RSP.
2. We strongly support a culture of speaking up for both suppliers and their workers without fear of retaliation against those who report actual or suspected breaches.
3. Suppliers, their employees, workers or contractors may report actual or suspected breaches of this RSP to Unilever by phone or online. Reports can be submitted confidentially and anonymously (where permitted by law). For more information, click on [Raise a Concern](#)
4. Unilever will investigate any concern raised and discuss findings with the supplier. The supplier shall assist with any such investigation and provide access to any information reasonably requested.
5. If remediation is required, the supplier will devise and inform Unilever of their corrective action and implementation plans and timeline to effectively and promptly resolve the breach.

IMPLEMENTATION TIPS

- Familiarise yourself and your employees with the RSP and how to report suspected breaches to Unilever.
- Speak to your Unilever Procurement or Social Accountability contact to discuss any areas you don't understand.
- Review your current practices against the Policy to ensure you are not at risk of any breaches of the Policy.

A woman wearing a yellow hijab and a beige blazer is holding a piece of paper with a hand-drawn diagram of a water filter. The diagram shows a container with a filter inside, and water being poured into it. She is looking at the diagram and smiling. In the background, there is a large wooden board and a person's head is visible in the foreground, looking towards the woman. The image is partially covered by a green circular overlay on the left side.

SECTION 3

CONTINUOUS IMPROVEMENT GUIDELINES AND TIPS

CONTINUOUS IMPROVEMENT GUIDELINES AND TIPS

This section contains guidelines and tips relating to all the Fundamental Principles encompassed in the RSP for Mandatory, Good and Best Practice to assist suppliers as their organisations move up the continuous improvement ladder.

- Guidelines are our recommendations for the implementation of a comprehensive and robust process to help meet our Mandatory Requirements for compliance.
- These Guidelines can also help suppliers achieve Good and Best Practice within a reasonable timeframe. We will continue to share best practices and updated guidance with our suppliers to help them reach this level. Likewise, we always value receiving suppliers' collaborative input.
- These Guidelines are comprehensive but not exhaustive. They comprise the critical elements of what is generally advisable to reach Mandatory Requirements and to progress toward Good and Best Practice.

Throughout this section, the implementation tips are provided as additional information and recommendations to help Unilever's suppliers comply with the RSP. Independent input from suitable professionals should be obtained where assistance is required. In particular, the tips do not constitute legal advice and do not relieve suppliers of their obligations to consult legal professionals, as appropriate, on contractual terms and obligations, and on how to comply with all laws and regulations relevant to them in the countries where they operate. In addition, the tips do not preclude the supplier from going beyond what is suggested.



1.

BUSINESS IS CONDUCTED LAWFULLY AND WITH INTEGRITY

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 1.1. Procedures to ensure that all applicable laws and regulations are complied with by the supplier and its workers are tailored to the size and risk profile of the business.
- 1.2. Senior management are engaged and have oversight of the content and implementation of their compliance framework.
- 1.3. There is a clear commitment to zero tolerance of bribery or corruption in all forms.
- 1.4. A regular risk assessment is undertaken to identify key compliance risks.
- 1.5. Clear and effective internal training and/or guidelines are in place to embed a culture of integrity and mitigate key risks, for example; on gifts and hospitality, conflicts of interest, handling competitor information and anti-competitive behaviour. Such guidelines are readily available to the supplier's workers.
- 1.6. Appropriate due diligence checks are conducted in respect of third party relationships, whether new or ongoing, to ensure they meet equivalent standards.
- 1.7. Non-compliance by the supplier's workers with any applicable law, regulation or policy is subject to appropriate sanctioning and remedial procedures.

UNILEVER RESPONSIBLE SOURCING POLICY



- 1.8. Financial procedures ensure the proper recording of all financial transactions, and facilitate the identification of any suspected money laundering activities. They ensure that no undisclosed or unrecorded account, fund or asset is established or maintained.
- 1.9. Procedures and mechanisms are in place to ensure that all confidential information, whether business or product related, is safely stored with limited access rights on a need-to-know basis only.
- 1.10. Procedures are in place to ensure that any product quality or safety concerns originating from the supplier or its supply chain are notified to Unilever without delay.
- 1.11. As part of a culture of promoting speaking up, there is zero tolerance for retaliation and the anonymity of persons wishing to raise concerns is protected to the extent permitted by law.

ADVANCING TO GOOD PRACTICE

- 1.12. A Code of Conduct, guidelines, policies and/or training covering each of the elements of this RSP are in place and readily available to workers.
- 1.13. There are procedures to communicate, monitor and measure the effectiveness of the Code of Conduct, guidelines, policies and/or training.
- 1.14. Preventive and remedial measures are taken to address adverse impacts that are directly linked to the supplier's operations, products or through business relationships.

- 1.15. The supplier has in place a code of conduct or responsible sourcing policy for its direct suppliers, consistent with the requirements of this RSP. In addition, there is a process to communicate this to all of its direct suppliers and to monitor compliance by these direct suppliers.
- 1.16. Suppliers' executive management and leaders are held accountable for compliance and conducting business with integrity, with individual sanctions applied as appropriate to a fair and consistent standard.
- 1.17. Workers have multiple grievance channels available to them.
- 1.18. Procedures have been developed to investigate grievances.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 1.19. Additional steps are taken to continuously improve the effectiveness of relevant policies and processes, in consultation with key stakeholders, and thereby:
 - i. ensure all relevant risks of non-compliance with laws are addressed;
 - ii. affirm the responsibility for the implementation of such policies by the board of directors or equivalent body;
 - iii. extend training to contractors and suppliers as appropriate; and
 - iv. enable independent assurance.
- 1.20. Suppliers' third party business partners are able to raise concerns anonymously.
- 1.21. The supplier is prepared to take a public position on ethical issues and engage in collective action where appropriate.

IMPLEMENTATION TIPS

- Compliance materials should clearly set out what is expected of the workers, in a language they understand.
- Ensure clear senior management buy-in and a strong tone from the top.
- Allocate resources consistent with actual risks faced.
- Regularly evaluate business practices for compliance gaps, if appropriate using external professional support.



2. WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED AND DOCUMENTED TERMS OF EMPLOYMENT

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 2.1. The key components of the employer/worker relationship such as hours, overtime, pay, benefits, leave, disciplinary and grievance systems are: (i) freely agreed by both parties; (ii) documented in writing; and (iii) signed by the employer and worker.
- 2.2. Suppliers shall ensure that the terms and conditions of employment contracts are in a language understood by the worker and are explained verbally if required.
- 2.3. Changes are agreed in writing by both employer and worker.

ADVANCING TO GOOD PRACTICE

- 2.4. Key management functions such as hiring, grievances, discipline, promotion and termination have clear policy frameworks, procedures for implementation and trained staff responsible for implementing them. Appropriate documentation is kept.
- 2.5. These policies and procedures are explained to workers upon hiring and contained in a workers' manual, and workers are trained to understand and use them.

- 2.6. Ongoing training practices are provided for all categories of workers to raise and broaden their skills to enable them to advance in their employment.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 2.7. There is a clear and transparent system of worker and management communication that enables workers to consult and have an effective dialogue with management.
- 2.8. Short-term, casual or agency workers are regularised where the work involved is clearly of a regular nature and is required all year round.
- 2.9. These employment relation policies and procedures are reviewed periodically and any necessary improvements are made to ensure that all categories of workers, regardless of contract status, have the same rights and entitlements at work. Special attention is paid to short-term, casual and agency workers and to vulnerable groups such as women, migrants, the disabled, legal young workers and interns/trainees to ensure such workers have exactly the same entitlements as full-time local workers.
- 2.10. The Human Resources function ensures legal compliance throughout the employment relationship and develops, motivates, recognises and rewards workers and engages in social dialogue.

IMPLEMENTATION TIPS

- Workers' employment contracts should contain all necessary information so that the worker knows what is expected. The contracts should be explained to workers in a language they can understand. Employment contracts should be agreed and signed by the workers and the supplier.
- Policies and procedures should be developed on all key aspects of the employment relationship.
- Develop a worker handbook which includes the employment policies and procedures. Provide training for all workers so they know how the policies and procedures apply to them.
- Ensure all workers receive equal treatment regardless of their contract type. This includes short-term and agency workers, women, migrants, disabled and young workers.



3. ALL WORKERS ARE TREATED EQUALLY AND WITH RESPECT AND DIGNITY

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 3.1. Policies that prohibit discrimination of any form on the basis of race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views are in place, and there are procedures to implement them.
- 3.2. These policies highlight actions to protect the rights of any worker considered vulnerable to discrimination.
- 3.3. Pregnancy testing or other forms of health screening that might result in discrimination are not tolerated (except when such health tests are mandated under local laws).

ADVANCING TO GOOD PRACTICE

- 3.4. Selection criteria for all human resource decisions are objective and transparent and controls are in place to prevent arbitrary decisions.
- 3.5. Staff members responsible for hiring, paying, training, promoting, disciplining and terminating workers are trained to avoid discrimination in the exercise of their duties.

3.6. All workers and their managers are trained to recognise and prevent harassment, abuse and other forms of intimidation.

3.7. Managers, frontline supervisors, production staff, quality controllers and guards are trained to avoid discrimination.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 3.8. Human Resources records are kept and data analysed to ensure that equality is achieved in practice.
- 3.9. Regular assessments are conducted and any gaps or shortcomings identified are addressed through an action plan with measurable outcomes.
- 3.10. Specific and measurable targets for achieving equality between women and men are set and affirmative action is taken to attain them.
- 3.11. Programmes addressing the needs of the most vulnerable workers, such as flexible time options, child and dependant care, and mentoring programmes are in place.



UNILEVER RESPONSIBLE SOURCING POLICY



IMPLEMENTATION TIPS

- Communicate your non-discrimination policy. Ensure that all workers regardless of contract type are treated with respect.
- Make certain that discrimination based on race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views is prevented when making hiring, compensation, advancement or discipline decisions, including termination.
- Provide training to ensure that managers including supervisors and guards understand how to carry out their functions without discriminating.
- Test your policy and training effectiveness by collecting and analysing human resource data, looking for possible areas of discrimination.



4.

WORK IS CONDUCTED ON A VOLUNTARY BASIS

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 4.1. There are hiring policies, procedures and trained staff to ensure that workers are entering into employment freely and equally and that they are never prevented from leaving if they so wish.
- 4.2. Workers have freedom of movement and are not confined to the supplier's premises, including dormitories or provided housing.
- 4.3. Workers are not required to surrender their identification papers. Where the retention of identification papers is legally required, arrangements are made to ensure that workers can access their identification papers, are not prevented from leaving the workplace and that their papers are returned immediately upon cessation of employment.
- 4.4. Workers should not be required to pay a fee in connection with obtaining employment (including migrant workers or recruited workers supplied through an agency). Suppliers should be responsible for payment of all fees and expenses. Workers are not required to pay deposits in relation to their employment.

ADVANCING TO GOOD PRACTICE

- 4.5. To the extent possible, workers are hired directly and transparently, or only through recruitment agencies that have developed policies and strategies to combat trafficking and forced labour.
- 4.6. Voluntary prison labour may be used when prisoners are being rehabilitated or trained in preparation for release and where their terms and conditions of employment are similar to those in the open labour market.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 4.7. Recruitment of migrants includes full transparency about terms, conditions and any employment costs, and the migrants are informed about the labour laws applicable in the place of work prior to granting their written consent.
- 4.8. Policies, procedures and training are regularly reviewed to ensure that they are effective in preventing forced labour.



IMPLEMENTATION TIPS

- Have clear processes to ensure that workers have freedom of movement and are not confined to facilities premises, including worker accommodations where provided.
- If you use labour brokers or agencies to supply workers, ensure that you fully understand their policies and procedures and know that they are not using forced or trafficked labour. Verify that workers do not pay fees to secure employment contracts and that they were correctly informed of the terms and conditions of the job they received and are aware of all costs.

15+

5.

ALL WORKERS ARE OF AN APPROPRIATE AGE

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 5.1. An employment policy is in place specifying the minimum age for employment, together with effective procedures and means of age verification to implement this policy.
- 5.2. Responsible remedial measures are immediately implemented whenever any breach of that policy is identified.
- 5.3. In all circumstances the health and safety of young workers are considered and protected. This protection should preclude them from certain types of work such as hazardous or night work and requires extra care and commitment.
- 5.4. The goals and requirements set out in the International Labour Organization Worst Forms of Child Labour Convention are met.
- 5.5. The goals and requirements set out in the International Labour Organization Minimum Age Convention are met, including those regarding minimum age, appropriate types of work for young workers, hours of work, health and education concerns.
- 5.6. Policies clearly state that individuals under the age of 15 are not allowed on work premises where hazards may exist.

ADVANCING TO GOOD PRACTICE

- 5.7. All relevant supervisors are trained to respect the provisions for young workers, apprentices and interns, especially with respect to hours of work, night shifts, weekend work and heavy or dangerous work.
- 5.8. Periodic health screening of juvenile workers, apprentices and interns is provided.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 5.9. For any adverse impact on children's rights beyond those stipulated by law (such as but not limited to children's rights to care, protection, education and development) which are caused or contributed to by the supplier directly or indirectly through labour agencies, remedial action shall be provided by the supplier, through legitimate processes, or the supplier shall co-operate with such action.
- 5.10. The effectiveness of the supplier's system is regularly monitored to prevent the hiring of minors and to check the adequacy of efforts to protect children's rights.

IMPLEMENTATION TIPS

- Age verification for job applicants is an important step in ensuring that you do not hire under-age workers. Document your process.
- If you use contract labour, ensure that your agency also has an age verification process.
- Extra care should be taken when hiring legally authorised young workers. Your policies, procedures and training both for workers and management should comprehend the additional steps needed to safeguard young workers.
- When hiring young workers, keep in mind the impact of their working on family life, education and social development. Periodically evaluate the impact and address issues.



6.

ALL WORKERS ARE PAID FAIR WAGES

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 6.1. Workers receive a payslip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, benefits, incentives/bonuses and any deductions.
- 6.2. Wages are paid on time and in full.
- 6.3. All work is compensated according to at least the legal minimum standards or the appropriate prevailing industry standards, whichever is the higher, including that of interns/students receiving academic credit for their work.
- 6.4. All legally mandated deductions, such as taxes or social insurance, are deposited each pay period to the legally stipulated accounts or agencies and as required by law.
- 6.5. Other than legally mandated deductions, all other deductions from wages are made only with the express and written consent of the workers.
- 6.6. Migrant workers' remittances are authorised in writing.

ADVANCING TO GOOD PRACTICE

- 6.7. There is a system of periodic assessment in place to ensure equal pay for equal work.
- 6.8. There is a living wage approach to fair compensation which encompasses a system to periodically assess that wages are sufficient to meet the basic needs of the worker and to provide some discretionary income.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 6.9. A best practice fair compensation system is in place for all workers. This system categorises workers according to qualifications, skill and experience; recognises and rewards them for performance through wage and non-wage benefits/incentives; regularly assesses and adjusts their pay according to the cost of living, basic needs, discretionary income, relevant market benchmarks and enterprise performance; and engages in regular social dialogue on compensation questions.

UNILEVER RESPONSIBLE SOURCING POLICY



IMPLEMENTATION TIPS

- Your compensation system should be transparent to your workers. All workers should receive a physical or electronic payslip. The payslip should detail all elements of compensation including hours worked, benefits received and deductions made. Provide sufficient training so that workers understand their compensation. Ensure that all deductions are understood and agreed to by the worker.
- Periodically evaluate how the wage you are providing meets the needs of workers. Where you find gaps, address the shortfalls.
- Overtime should not be a method for addressing inadequate wages.
- Adjust wages to reflect changes in the cost of living, worker and company performance.



7. WORKING HOURS FOR ALL WORKERS ARE REASONABLE

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 7.1. Clear policies are implemented regarding regular and overtime hours of work, with defined procedures for deciding on overtime and securing worker consent.
- 7.2. In the absence of law, the supplier will over time implement steps to meet the goals and requirements set out in the International Labour Organization Convention on hours of work and overtime so that the regular working week does not exceed 48 hours and other than in exceptional circumstances, the sum of regular and overtime hours in a week does not exceed 60 hours. Where the sum of regular and overtime hours in a week exceeds 60 hours under normal conditions, a plan to implement a step-wise and sustainable reduction toward this goal must be in place.
- 7.3. Workers are entitled to at least 24 consecutive hours of rest in every seven-day period. If workers are required to work on a rest day due to a genuine need for continuity of production or service, workers must receive an equivalent period of compensatory rest immediately following.
- 7.4. If the employment contract allows for contractual overtime, workers expressly agree to it. All overtime work by workers is on a voluntary basis.
- 7.5. All overtime work is paid at least to the rate defined by law.

ADVANCING TO GOOD PRACTICE

- 7.6. The goals and requirements set out in the International Labour Organization Convention on hours of work and overtime are met so that the regular working week does not exceed 48 hours, and overtime does not exceed 12 hours. Other than in exceptional circumstances, the sum of regular and overtime hours in a week does not exceed 60 hours.
- 7.7. All overtime work is paid at the appropriate premium rate according to law or to prevailing industry standards, whichever is the higher, and there is an effective mechanism to monitor hours of work.
- 7.8. Peak periods are planned in such a way as to avoid excessive overtime. Overtime is not used for extended periods as a means of making up for labour shortages or increased order volumes.
- 7.9. If sufficient workers cannot be hired, new working time arrangements are explored to ensure that overtime is the exception rather than the rule.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 7.10. Work-study, costing and scheduling systems are in place that plan production in such a way as to avoid overtime, except in exceptional circumstances.
- 7.11. Working time arrangements allow for a work-life balance.





IMPLEMENTATION TIPS

- Overtime should be used as an exception, and not the standard way you run your business.
- Document overtime and the workers' expressed acceptance.
- Anticipate possible issues that would result in overtime, such as machine downtime, late supplier deliveries, change to customer orders, absent workers and increases in volume. For each issue, have a plan to minimise overtime.
- Exceptional circumstances (with reference to 7.2) could include for example: peaks in seasonal production, fulfillment of exceptional production orders, or when recovering production after a strike, machinery broke down, or when there has been no electricity for a few hours or days.



8.

ALL WORKERS ARE FREE TO EXERCISE THEIR RIGHT TO FORM AND/OR JOIN TRADE UNIONS OR TO REFRAIN FROM DOING SO AND TO BARGAIN COLLECTIVELY

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 8.1. Clear policies, procedures and training of workers and managers to ensure freedom of association in day-to-day operations are in place.
- 8.2. Managers, supervisors and guards are trained to respect each worker's right to associate freely.
- 8.3. Collective bargaining negotiations are entered into when requested by legally recognised representative agents and collective agreements concluded.
- 8.4. Workers know and understand their rights and feel confident to exercise them, and that no other worker or manager will impede them in the enjoyment of that right.

ADVANCING TO GOOD PRACTICE

- 8.5. Policies covering hiring, discipline, promotion, wages, hours, grievances and termination all clarify that a worker's choice to form or join a trade union will not compromise their equal treatment at work.
- 8.6. Clear rules governing the activities of recognised trade unions in the workplace are in place.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 8.7. The goals and requirements set out in the International Labour Organization Convention on freedom of association and collective bargaining are met.
- 8.8. Social dialogue on all aspects of work is established with workers.

IMPLEMENTATION TIPS

- Develop policies and procedures that demonstrate a worker's right to freely associate and to collectively bargain. Train workers to respect that freedom.
- Ensure that your policies on hiring, promotion and termination do not inhibit freedom of association, trade union membership or associated activities.
- Ensure the effective implementation of legally binding collective bargaining agreements.



9.

ALL WORKERS' HEALTH AND SAFETY ARE PROTECTED AT WORK

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 9.1. Clear and effective policies and procedures are in place for occupational health and safety and are updated periodically.
- 9.2. Occupational health and safety policies and procedures are widely communicated.
- 9.3. Ongoing safety training is provided to all personnel, including managers, supervisors, workers and security guards.
- 9.4. All workers and other people who enter business premises are properly informed about the inherent dangers of the workplace and are provided with adequate knowledge and personal protective equipment to avoid such dangers.
- 9.5. All personnel who enter the premises or deal with products are properly informed about the appropriate actions to take should a health and safety incident occur.

ADVANCING TO GOOD PRACTICE

- 9.6. Occupational health and safety policies and procedures are included in the workers' manual.

- 9.7. The structural integrity and fire safety of worksites are specifically assessed and updated periodically.

- 9.8. Occupational health and safety committees are created and their roles are clearly understood by all workers and managers.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 9.9. Regular assessments are conducted to ensure the meaningful operation of the health and safety committees.
- 9.10. Risk assessments are conducted regularly and systems updated to reflect the changing risk profile of the workplace.
- 9.11. Regular assessments are conducted of the risk to the surrounding ecosystem of exposure to hazardous substances and steps are taken to manage any risks identified.



IMPLEMENTATION TIPS

- Develop a detailed safety plan. Your plan should include safety relevant to your operations. Build safety incident and accident reduction targets into your plan.
- Test the effectiveness of your plan regularly through drills, safety talks and safety walks, using any means necessary to make it work. Regularly evaluate your operations for safety issues, including company-provided worker housing and equipment.
- Appoint a senior member of management to administer and oversee your safety plan.
- Conduct training on all elements of the safety plan to ensure your workers understand and obey your safety rules.
- Conduct regular training on all elements of safety that are relevant to your operations. Examples might include: fire and electrical safety, confined space, hazardous chemicals and the use of personal protective equipment.
- Incentivise your workers to adopt and maintain good health and safety practices.
- Assess the potential impact of your activity on workers and the community and take steps to mitigate or avoid any negative impact.



10. ALL WORKERS HAVE ACCESS TO FAIR PROCEDURES AND REMEDIES

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 10.1. Procedures (i) provide effective, accessible channels for workers to complain, make suggestions and lodge grievances; and (ii) require the matter to be fully investigated and result in swift, unbiased and fair resolution.
- 10.2. Grievance mechanisms channels are widely communicated and guarantee the confidentiality of any complainant (if so desired) and prohibit retaliation.

ADVANCING TO GOOD PRACTICE

- 10.3. Grievance mechanisms are included in the workers' manual.
- 10.4. All workers and managers are trained on the policy and procedures for the handling of complaints and grievances. Workers are confident that any complaint is handled objectively and fairly.
- 10.5. Specific measures exist to protect complainants against victimisation. All managers are trained to avoid recriminations.
- 10.6. Remedies are timely and open to appeal.

UNILEVER RESPONSIBLE SOURCING POLICY



ACHIEVING AND MAINTAINING BEST PRACTICE

- 10.7. Data on the receipt and handling of grievances is maintained and analysed to ensure the efficacy of the grievance mechanisms.
- 10.8. Where there are recognised trade unions, the role of shop stewards and union officials in handling the grievances of their members is clearly specified.
- 10.9. Distinct procedures managed by trained personnel are available for cases involving sexual harassment or assault. Those procedures take account of the potential trauma and risks involved and make provision for counselling and other support to victims, as needed.



IMPLEMENTATION TIPS

- Provide adequate and confidential channels for workers to express grievances and make suggestions. Make sure that workers are familiar with how to report and process grievances.
- Having multiple ways for workers to express issues or items of concern is recommended (Suggestion Boxes are not considered particularly effective grievance tools). Additionally, all mechanisms should be administered so that workers feel free to use them and have no concerns about retaliation.
- View grievances positively – they are part of every business. Be open to constructive challenges and use them as a powerful feedback loop.
- Train staff in the soft skills (how to talk to people, show empathy, concern, etc) to avoid grievances.
- Document investigation and resolution of grievances.
- Encourage submission of suggestions and highlight adoption and implementation.



11.

LAND RIGHTS OF COMMUNITIES, INCLUDING INDIGENOUS PEOPLES, WILL BE PROTECTED AND PROMOTED

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 11.1. A zero land grabbing policy is implemented.
- 11.2. Where applicable, due diligence is undertaken to uphold individual or indigenous peoples' established rights to property and land.
- 11.3. Where applicable, periodic training on Free, Prior and Informed Consent (FPIC) is provided to all relevant staff members.
- 11.4. There is zero tolerance of land grabbing within the supply chain and this is stated in the suppliers' code of conduct (or equivalent).

ADVANCING TO GOOD PRACTICE

- 11.5. A system for due diligence is in place to uncover and disclose risks and impacts to communities related to land issues.
- 11.6. The right of women to land ownership and access to land is recognised.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 11.7. Impact assessments are conducted with full participation of affected communities and published in a format and language accessible to those affected communities. The assessment data is disaggregated by gender, national origin, tribe or caste.
- 11.8. A public commitment is made to actively support responsible agricultural investments, the UN Voluntary Guidelines on the Responsible Governance of Tenure and full traceability.

IMPLEMENTATION TIPS

- Land rights are relevant where land for your business needs to be acquired, leased or used.
- As a responsible business, make certain you know what action to take and who needs to be consulted to ensure legal, environmental and social requirements are assessed and managed where relevant.
- Ensure individuals responsible for land acquisition, or land use changes, fully understand the impact of those changes and can demonstrate proper land title and contract transparency through assessment outcomes.



12.

BUSINESS IS CONDUCTED IN A MANNER WHICH EMBRACES SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT

GUIDELINES TOWARDS IMPLEMENTATION OF MANDATORY REQUIREMENTS

- 12.1. All necessary current and valid legal permits are held for its operations.
- 12.2. Training is provided to all relevant personnel to ensure knowledge of and compliance with all necessary legal permits.
- 12.3. Environmental management policies and procedures are in place regarding water, energy, hazardous materials, air quality and emissions, deforestation, waste and other significant risks.

ADVANCING TO GOOD PRACTICE

- 12.4. Training is provided to all personnel on environmental policies and procedures to ensure effective implementation and compliance.
- 12.5. Transparency is ensured on environmental performance.

ACHIEVING AND MAINTAINING BEST PRACTICE

- 12.6. Sustainability practices are embedded across the supplier's operations and activities which aim to (i) reduce the generation of waste and achieve zero landfill; (ii) reduce greenhouse gas emissions and achieve carbon neutral solutions; (iii) reduce the consumption of water; (v) protect and enhance nature and biodiversity; and (vi) halt deforestation.

- 12.7. A systematic review of the supplier's sustainability practices and environmental management systems is undertaken regularly with support from experienced conservationists and with the involvement of local communities to determine whether appropriate policies and procedures are in place and are functioning to achieve the aims outlined in this topic.

IMPLEMENTATION TIPS

- **Have a business plan that includes clear environmental performance targets.**
- **Ensure workers responsible for assessment and implementation of your environmental targets fully understand all the minimum requirements of local, national and international law related to environmental standards.**
- **Your company should have valid relevant permits for use and disposal of resources.**
- **Work to continuously improve your environmental performance in collaboration with internal and external stakeholders.**
- **Exhibit leadership by making a public commitment of your environmental targets and results. Promote awareness of the environmental impact of your site and its processes.**



APPENDIX

UNILEVER RESPONSIBLE SOURCING POLICY



APPENDIX

The following principles, standards and conventions were used in preparing this Responsible Sourcing Policy and may be a useful source of additional information:

- International Labour Organization: www.ilo.org with specific reference to:
 - International Labour Organization Convention on freedom of association and collective bargaining
 - International Labour Organization Convention on hours of work
 - International Labour Organization Convention on Minimum Age
 - International Labour Organization Convention on the Worst Forms of Child Labour
 - International Labour Organization Convention on Forced Labour
 - The International Labour Organization Convention on Abolition of Forced Labour
 - International Labour Organization Convention on Equal Remuneration
 - International Labour Organization Convention on Discrimination (Employment and Occupation)
- Business Principles for Countering Bribery produced by Transparency International: www.transparency.org
- International Chamber of Commerce anti-corruption guide for SMEs: <http://www.iccwbo.org/Data/Policies/2015/ICC-Anti-corruption-Third-Party-Due-Diligence-A-Guide-for-Small-and-Medium-sized-Enterprises/>

- United Nations Sustainable Development Goals: <https://sustainabledevelopment.un.org/sdgs>
- Ethical Trading Initiative: www.ethicaltrade.org/

For any questions, please email the **Social Accountability Team**, a part of Unilever's Integrated Social Sustainability group.



NOTE: This Responsible Sourcing Policy supersedes and replaces the previous Responsible Sourcing Policy (issued in 2014) and the previous Supplier Code. Any reference to the Responsible Sourcing Policy, RSP and/or the Supplier Code in any documentation or contracts with the supplier is intended to refer to this Responsible Sourcing Policy.



Unilever



RESPONSIBLE BUSINESS PARTNER POLICY



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INTRODUCTION

At Unilever, we take great pride in the fact that through our brands and products we touch the lives of two billion consumers across 190 countries every day.

To reach our consumers, we work with a high number of Business Partners both upstream (suppliers) and downstream (customers and distributors). We rely on sophisticated and agile networks to deliver consistently high quality products to our consumers.

From sourcing raw materials into our factories to the way consumers access and use our products, Unilever's global reach gives us a unique opportunity to lead the way in championing ethical business practices. We want business integrity to be business as usual across our entire operational footprint.

Breaches of human rights ruin lives and livelihoods. The cost of corruption is a powerful obstacle to sustainable economic growth. Doing business with integrity is a non-negotiable for Unilever: we are committed to working with others who share our values and seek to operate to the same standards as we do. Collective action is key to successfully upholding human rights and fighting corruption in all its forms.

Our Responsible Business Partner Policy sets out our approach to identifying and tackling actual or potential concerns effectively. We are inviting our Business Partners to join us on this journey so that together we can accelerate the pace at which we bring about positive, sustainable change. By becoming a Unilever Business Partner, you will agree to comply with this Responsible Business Partner Policy.

Ritva Sotamaa
Chief Legal Officer



Ritva Sotamaa



CONDUCTING BUSINESS LAWFULLY AND WITH INTEGRITY

Compliance with Laws

All applicable laws and regulations are complied with in the countries in which the Business Partner operates, including relevant international laws and regulations such as those on trade sanctions, export controls, reporting obligations, data protection and antitrust.

Bribery

There is a prohibition of any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the Business Partner.

Conflicts of Interest

All and any conflict of interest in any business dealings with Unilever, of which the Business Partner is aware, will be declared to Unilever to allow Unilever the opportunity to take appropriate action. Any ownership or beneficial interest in a Business Partner's business by a government official, representative of a political party or a Unilever employee are declared to Unilever prior to any business relationship with Unilever being entered into.

Gifts and Hospitality

Any business entertaining or hospitality is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way decisions about future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.



CONDUCTING BUSINESS LAWFULLY AND WITH INTEGRITY

Confidential and Competitor Information

All competitive information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempt is made to divulge to Unilever any information about its competitors. Likewise Unilever's confidential information must not be shared with any third party unless expressly permitted by Unilever.

Financial Records, Money Laundering and Insider Trading

All business and commercial dealings are transparently performed and accurately recorded in the Business Partner's books and records. There is no actual or attempted participation in money laundering. No confidential information in the Business Partner's possession regarding Unilever is used to either engage in or support insider trading.

Safeguarding Information and Property

Unilever's confidential information, know-how and intellectual property is respected and safeguarded. All information provided by Unilever that is not in the public domain is deemed confidential and is only to be used for its intended and designated purpose. All and any personal information about individuals, such as Unilever's consumers or workers are handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

Product Quality

Products and services are stored and delivered to meet the specifications, quality and safety criteria specified in the relevant contract or product documents and are safe for their intended use.



RESPECTING TERMS OF EMPLOYMENT AND HUMAN RIGHTS

Terms of Employment

Policies are adopted and adhered to that respect legal and contractual rights of workers¹, both permanent and casual.

Workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis.

Respect, Dignity and Fair Treatment

All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination, based on race, age, role, gender, gender identity, colour, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership or political views is prevented.

In particular, attention is paid to the rights of workers most vulnerable to discrimination.

¹The term 'Worker' refers to:

- Employees, whether they are full time, part-time, fixed-term, permanent or trainees; and
- Contractors, temporary staff, secondees, work-experience placements.



RESPECTING TERMS OF EMPLOYMENT AND HUMAN RIGHTS

Permitted Workforce

No workers are under the age of 15 or under the local legal minimum age for work or mandatory schooling age, whichever is the higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school. Forced labour, whether in the form of indentured labour, bonded labour or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited.

Health and Safety

A healthy and safe workplace is provided to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.

Trade Unions and Collective Bargaining

The legal right of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their legal right to join or refrain from joining any organisation.



COMMITMENT TO SUSTAINABILITY

Land Rights of Communities

The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

Sustainability and Environment

Operations, including distribution of products and the supply of services are conducted with the aim to protect and preserve the environment.

Reporting Concerns, Handling Grievances and Non-retaliation

Workers are provided with means by which to raise their concerns about any of the compliance requirements outlined in this Policy and all workers who speak out about an issue are protected from retaliation. Further, workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.

Reports can be submitted confidentially and anonymously (where permitted by law).

For more information or to raise a concern go to:

www.unilevercodesupportline.com



IMPLEMENTATION TIPS

To support compliance with this Policy you may want to implement within your own business the following: train employees; communicate reporting and complaint mechanisms; communicate compliance policies and procedures; conduct periodic compliance reviews and assessments within your business; introduce remediation steps and action plans where compliance weaknesses are identified or suspected; ensure your own adequate compliance processes and mechanisms are in place; and other similar steps.

For any questions regarding the Responsible Business Partner Policy please email: RBPP.Questions@unilever.com

The implementation tips are provided as additional information to help Unilever's business partners comply with the Responsible Business Partner Policy. These tips are recommendations only and are not intended to relieve business partners from complying with all applicable laws and regulations in the countries in which the business partner operates and all other applicable international laws and regulations, as well as all contractual obligations. These tips do not preclude a business partner from going beyond what is suggested. These tips are not exhaustive nor are they intended to constitute legal advice or other professional services. The services of suitable competent professionals should be obtained where legal advice or other professional assistance is required.

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