





### Contents

3

Introduction

Explains what our RPP is, why it's being updated, who it applies to, what's required and how we will verify if partners are meeting our requirements

# 8 Fundamental Principles

A quick guide to the three pillars and each of the 17 Fundamental Principles with quick access to help you navigate and jump to each of these

## 9 **Requirements**

Mandatory Requirements, Mandatory Management Systems, Future Mandatory Requirements, and including Leading Practices relating to each Fundamental Principle

# 36 **Reporting on breaches**

When and how to report breaches of the Responsible Partner Policy, including the actions that Unilever will take and what we expect of our Partners

# 37 Appendix

Key references and supporting documents



Our Responsible Partner Policy (RPP) and its Fundamental Principles embody our commitment to responsible, transparent and sustainable business. This commitment is at the core of the <u>Unilever Compass</u>, our sustainable business strategy, which sets out how we will deliver superior performance by being a purpose-led, future-fit business. Our Compass also explains our multi-stakeholder model, designed to deliver value to all stakeholders. We know we can't do this alone: we are committed to working in partnership.

Our RPP describes what Unilever requires of business partners so we can do business together responsibly. This 2022 version of our RPP replaces both our 2017 Responsible Sourcing Policy (RSP) and our 2017 Responsible Business Partner Policy (RBPP). It is designed to build more resilient businesses by moving beyond a compliance model to a continuous improvement process. This approach recognises the evolving nature of our third parties and value chains, while driving business growth and improved outcomes for people and planet.

Our business partners encompass upstream suppliers of materials and all types of services, including creative and media agencies, as well as our downstream distributors and customers. We seek to work with those who commit to achieving the Fundamental Principles of our RPP, within their own business and across their value chains.

## Embedding human rights and committed to fighting corruption

In line with the UN Guiding Principles on Business and Human Rights, which we are embedding throughout our business, we are committed to respecting internationally recognised human rights. We base our human rights commitments and policy, including the Fundamental Principles of our RPP, on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises.

We are driving the practical implementation of respect for human rights through due diligence processes including new management system requirements within our RPP.

We are committed to doing business with integrity, consistently demonstrating high global standards, and fighting corruption in all its forms. We expect our business partners to adhere to values and principles consistent with our own.

#### Protecting and preserving the environment

We are committed to conducting business through an approach that embraces sustainability and increases our positive impact on the environment. This includes managing our operations, the sourcing, manufacturing and distributing of our products, and the supply of services, in ways that protect and preserve the environment. Our Fundamental Principles for the Planet align with the areas where Unilever has the greatest opportunity to minimise negative impacts and maximise positive impact. Here we address holistic environmental sustainability, with emphasis on climate, water, waste, biodiversity, no deforestation and plastic.

We are committed to working with our business partners to achieve the Fundamental Principles of our RPP and we recognise our own responsibilities within this. We also appreciate that delivering our RPP relies on more than cooperation with our business partners: it requires a complete industry-wide effort. Our ambition is for Unilever and its business partners to enable this collaboration and change.

Willem Uijen	Kim Mor
Chief Procurement	Chief Bus
Officer	Integrity

**Kim Morgan-Verlaque** Chief Business Integrity Officer **Conny Braams** Chief Digital & Commercial Officer



Unilever

Responsible

Partner

Policy



#### The different elements of our RPP

Each Fundamental Principle of our RPP provides guidance on what Unilever expects of our responsible and sustainable business partners.

- Mandatory Requirements: The minimum requirements you must meet in order to be a Unilever business partner.
- Mandatory Management Systems: The appropriate policies, processes and procedures that you must have in place and implement in order to achieve and maintain the Mandatory Requirements. The type and complexity of management systems required will depend on the size, type and risk profile of your business, with consideration of the severity of the impact of those risks.
- Future Mandatory Requirements:

These are requirements that are not yet mandatory in order to do business with us but will be mandatory in the future. We include these requirements here to give you advance notice because we recognise that achieving them may take time. Our timeline for implementing these requirements, and who they apply to, can be found at www.unilever.com/suppliers/ becoming-a-unilever-supplier. We will update this information as we work toward implementation together, so timelines may change and be accelerated or extended.

**Leading Practices:** These are examples of the practices that companies can work towards as part of continuous improvement.

The Fundamental Principles of our RPP are organised into three main pillars:

- Business Integrity & Ethics
- Human Rights
- Planet

We recognise that these three pillars are increasingly interconnected and interdependent and therefore you need to consider them together to meet the requirements.

Where your contract or product specification with Unilever includes a requirement to meet a higher standard than our RPP, that higher standard will take precedence over our RPP.

As a Unilever business partner, there are certain countries to which you may supply goods or services, or do business in, that require you to meet additional, specific mandatory standards or to fulfil other legal obligations relating to Business Integrity & Ethics, Human Rights and Planet. These additional requirements and legal obligations must also be adhered to as Mandatory Requirements of our RPP. These requirements and obligations are set out in our Implementation Guidance document, that accompanies our RPP.

#### Implementation guidance

You are expected to determine and take responsibility for the steps required for your organisation to be able to meet or exceed the Mandatory Requirements of our RPP. The Implementation Guidance provides you with examples of effective steps and additional information on approaches to help you achieve and sustain the Mandatory Requirements. This guidance should be read alongside our RPP.





#### Who does our RPP apply to?

#### Who is in scope of our RPP?

- All 'Tier 1' suppliers, defined as those who invoice Unilever for goods or services
- Companies in any tier that do the work that Unilever contracts from a Tier 1 supplier
- Any supplier beyond Tier 1 who has a contract with Unilever, or whom Unilever has expressly appointed to provide goods or services to the Tier 1 supplier, even where they do not directly invoice Unilever
- Companies distributing and/or selling on behalf of Unilever, inclusive of agents, franchisers and importers
- Customers and business partners that Unilever directly contracts with to bring our products to Unilever's consumers around the world, inclusive of retailers and digital commerce sellers
- Charities, NGOs and social enterprises who receive funding or product donations from Unilever

#### What type of business?

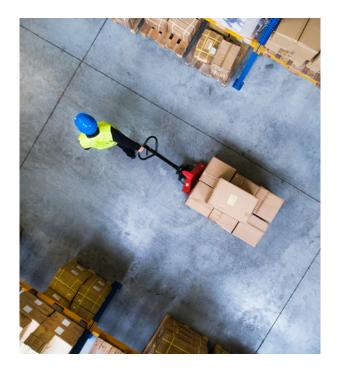
• ALL types of business, regardless of size and number of employees

#### Who in the business?

- Everyone in your company, including:
- All employees of your company
- All parts of your company, divisions and operations
- All group companies
- Contracted workers or services employed by your group companies to enable the running of your company (for example: contracted workers for manufacturing, security, catering, janitorial and other services)
- People you sub-contract work to, including:
  - Sub-contractors of services doing the actual work that Unilever is being invoiced for, including selfemployed workers or people in the 'gig-economy'
  - Sub-contractors of raw materials or goods that Unilever is sourcing, including through traders, brokers and/or agents

Throughout our RPP, we generally refer to 'business partners'. In places where our RPP refers specifically to 'suppliers', those sections do not apply to other business partners.

Beyond those listed above, we expect you to cascade equivalent requirements within your supply chain by carrying out human rights and environmental due diligence. This is to identify, prevent, mitigate and account for how you address and manage potential and actual adverse impacts on human rights and the planet that are directly linked to your operations, products or services by your business relationships, as well as those you may cause or contribute to through your own activities.



Introduction

Introduction — Fundamental Principles — Requirements — Reporting on Breaches — Appendix 6



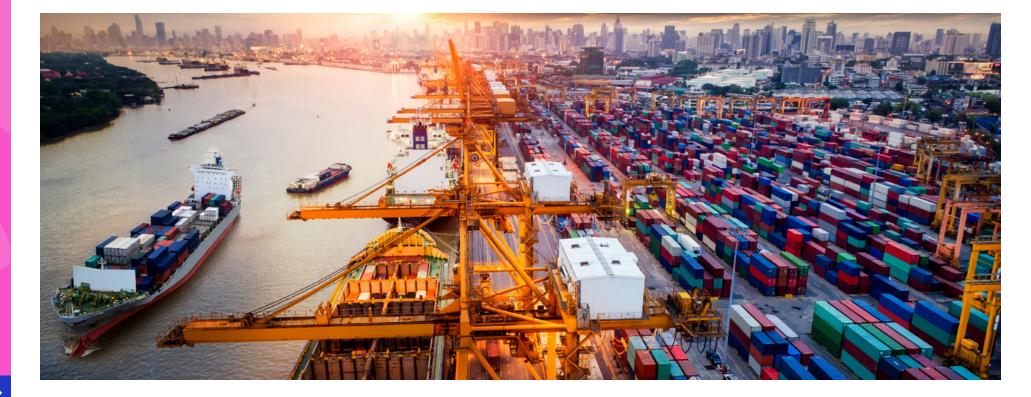
Responsible Partner Policy

#### Your policies, not ours!

- The Mandatory Requirements represent the minimum threshold that you must achieve in order to do business with Unilever
- You are **not** expected to 'sign up' to Unilever's RPP, but instead to confirm to Unilever that you can and do meet or exceed the Mandatory Requirements through the application of your own policies and practices
- Dependent on size and risk, you are expected to have your own policies, training, governance and compliance programmes in place to ensure that they are known and fully implemented within your organisations, and that employees and workers know, respect and observe your company's policies
- If you do not yet have your own policies in place you are free to make use of our RPP in creating your own policies tailored to the scope of work and activities that you perform. We do not have a copyright on our RPP for this reason

 You do not need to inform Unilever if you change your own policies or practices, unless those changes mean that you are no longer able to meet the Mandatory Requirements

The Mandatory Requirements are rooted in international standards, regulations and conventions that are widely used and aligned with similar expectations by other companies.





# How we conduct due diligence and how we verify alignment with our RPP

We verify alignment to and achievement of our RPP's Mandatory Requirements and Mandatory Management Systems through the use of self-declaration, due diligence scanning, online assessments and independent verification by thirdparty audits in high-risk sites. Risk assessment is based on the size of the business and both the types of goods or services being supplied and the country of operations, using data from external expert organisations.

The verification processes through third-party audits encompass methods suitable to the type and size of your business, as well as the goods and/or services you provide.

Unilever uses industry-leading auditing methodologies and is working with peer companies to improve and reduce the variety of methodologies in use, increasing the potential for mutual recognition. Mutually recognising audits enables focus on addressing any identified issues, rather than requiring suppliers to perform multiple different audit methodologies. As a member of <u>AIM-Progress</u>, Unilever is committed to mutual recognition and we also support the <u>Sustainable Supply Chain Initiative</u> of the <u>Consumer Goods Forum</u>. Information on our audit requirements and on which audits and audit companies are accepted can be found at <u>www.unilever.com/suppliers/becoming-</u> <u>a-unilever-supplier</u>

For suppliers of key agricultural materials, our requirements are defined in <u>Unilever's Sustainable Agriculture</u> <u>Code</u> (SAC) and accompanying SAC Scheme Rules. Where suppliers of agricultural raw materials have undergone audits against SAC or SACbenchmarked equivalent standards of their facilities, this is considered as sufficient verification of our RPP. Where there is no audit of facilities as part of the SAC or SAC-benchmarked equivalent standards, high-risk sites will require an audit to verify alignment with our RPP.

Unilever's due diligence process also includes other means of assessment such as impact and risk assessments. These aim to identify and prevent any negative business integrity, human rights or environmental impacts, particularly to those most at risk – for example children, women, migrant workers, indigenous peoples and communities - and to remediate any issues. We expect our business partners to undertake the same.

We encourage you to contact the Unilever team if you face challenges in meeting our requirements through implementing your own approaches. We will endeavour to provide support and guidance. We also encourage you to share any insights that will help us improve the Unilever Responsible Business Programme and how we govern and monitor it within our value chain. We embrace the spirit of partnership in areas where we can collaborate in a pre-competitive environment to address endemic issues in our industries.

If you have any questions or comments, please email: <u>Responsible.Business@Unilever.com</u>







#### 1. Legal Compliance & **Countering Corruption**

Business partners comply with relevant laws and regulations and have a zero-tolerance approach to all forms of corruption.



#### 2. Safeguarding Information & Property

5. Free from Discrimination

any form of discrimination.

Business partners protect information and collect, process, store, transfer and dispose of personal data responsibly.



#### 3. Sourcing and **Manufacturing Products**

Products and materials supplied to Unilever are appropriately sourced, tested and meet agreed specifications.

#### Pillar 2 Human Rights



4. Freely Agreed Terms of Employment

> Work is conducted on the basis of freely agreed and documented terms of employment.



#### 7. Work is Voluntary

Employment is accepted and work is conducted on a voluntary basis.



**10. Reasonable Working Hours** Working hours for all workers are reasonable.



#### 13. Access to Grievance **Mechanisms & Remedies**

All workers have access to grievance mechanisms with fair procedures and remedies.

#### Pillar 3 Planet



#### 15. Protect and Regenerate Nature

Business is conducted in a manner which protects, preserves and regenerates nature including biodiversity.



#### 16. Climate Action

Greenhouse gas (GHG) emissions are reduced in line with the goals of the Paris Agreement.



#### 17. Waste-free World

The generation of waste is reduced and zero waste to landfill is achieved.



#### 6. Free from Harassment

All workers are free from harassment and abuse.

#### 8. Appropriate Age

All workers are of an appropriate age and young workers are

All workers are treated equally and

with respect and dignity without

#### 11. Freedom of Association

All workers are free to exercise their right to form and/or join trade unions and to bargain collectively.

#### 14. Land Rights

The rights and title to property and land of the individual and local communities are respected.



# protected.



#### 12. Health & Safety

9. Fair Waaes

All workers operate in a safe and healthy work environment that identifies and reduces risks to prevent accidents, injuries and illnesses.

All workers are paid fair wages.

Fundamental Principles



# Requirements

Mandatory Requirements Mandatory Management Systems Future Mandatory Requirements and Leading Practices



#### Legal Compliance & Countering Corruption

All relevant laws and regulations are complied with and there is a zero-tolerance approach to all forms of corruption.

#### **Mandatory Requirements**

#### Compliance with laws

1.1 All laws and regulations are complied with and required permits are held, for the countries where the business partner operates, as well as for all other applicable international laws and regulations.

#### Anti-bribery & corruption

- **1.2** All forms of corruption, including bribery, extortion and embezzlement are prohibited and prevented through adequate and proportionate procedures. Bribery of public officials or private organisation officials as well as facilitation payments and other forms of corruption (for example fraud or theft) are all covered by this prohibition. Any breach of this requirement in connection with Unilever business is promptly disclosed to Unilever.
- **1.3** A business partner is prohibited from offering anything of value to Unilever employees to improperly obtain or retain business.
- 1.4 Unilever employees are prohibited from soliciting any improper advantages from our business partners. A business partner must report any attempt by Unilever employees to solicit bribes from business partners through our <u>speak-up channels</u> at <u>www.unilevercodesupportline.com</u>

#### Gifts and hospitality

1.5 Gifts or hospitality offered to Unilever employees are not intended to influence decisions about how Unilever assesses performance or awards future business. They are legitimate, proportionate and respectful of Unilever's internal policies which limit significantly the acceptance of gifts and hospitality.

#### Avoiding conflicts of interest

- 1.6 All business transactions are free of conflicts of interest. Any material ownership or beneficial interest in a business partner's company by a public official, representative of a political party, Unilever employee or their relatives are declared to Unilever prior to any business relationship with Unilever so that Unilever can take appropriate action.
- 1.7 Any other conflict of interest in any business dealings with Unilever, of which the business partner is aware, is declared to Unilever to allow Unilever the opportunity to take appropriate action.



Integrity & Ethics ທ Ð Sin g 



# Accurate records, anti-money laundering and economic sanctions compliance

- **1.8** All business and commercial dealings are transparently performed and accurately recorded in a timely manner.
- 1.9 Confidential information in the business partner's possession regarding Unilever or any other company is not used to either engage in or support insider trading.
- 1.10 All economic sanctions, anti-money laundering and anti-tax evasion legislation and rules must be complied with. Any suspicions of occurrence of any of these issues in relation to transactions with Unilever are promptly reported to us and effective steps are taken to mitigate risks.

#### **Mandatory Management Systems**

#### For all mandatory requirements:

- 1.11 Systems are in place to regularly communicate on business integrity, ethics and compliance topics to employees, led by senior leaders.
- **1.12** Processes are in place to identify and assess key risks and to enable actions to respond to them, taking into account company size, country of operation, business activities and external environment.
- **1.13** Internal policies and guidance are designed, based on key risks, and communicated to employees as appropriate, given company size.
- **1.14** Training is in place to mitigate key risks and embed a culture of integrity.

# Specific to accurate records, anti-money laundering and economic sanctions compliance:

- **1.15** Financial procedures ensure the proper recording of all financial transactions and facilitate the identification of any suspected money laundering, tax avoidance and breach of economic sanctions activities.
- **1.16** No undisclosed or unrecorded account, fund or asset is established or maintained.

#### **Future Mandatory Requirements**

#### **Compliance with laws**

1.17 All relevant laws are complied with as they become binding on business partners operating in, or supplying to, applicable jurisdictions.

#### **Leading Practices**

- **1.18** Public positions are taken to advance business integrity and engage in collaborative actions where appropriate.
- 1.19 Independent risk assessments and audits are performed, and any gaps identified and remediated.
- **1.20** Communication and training to employees are tailored to identified risks and past cases. The effectiveness of training is measured.



#### Safeguarding Information & Property

Information is protected, whether that information derives from Unilever or from its competitors, and personal data is collected, processed, stored, transferred and disposed of responsibly.

#### **Mandatory Requirements**

#### Protecting Unilever's information and property

- 2.1 Unilever's, or any other party's, confidential information, know-how and intellectual property are respected and safeguarded.
- 2.2 All information provided by Unilever or another party that is not in the public domain is deemed confidential and only used for its intended and designated purpose.

#### **Competitor information**

- 2.3 All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations.
- 2.4 No attempt is made to divulge to Unilever, or to any other party, any commercially sensitive or confidential information about their competitors or the business partner's competitors.
- 2.5 Unilever's commercially sensitive or confidential information is not used for other business purposes or shared with any third party unless expressly permitted by Unilever.

#### Data ethics and privacy

- 2.6 Personal data is collected, processed, stored, transferred and disposed of in line with applicable laws and with respect for the protection of privacy as a human right.
- 2.7 The risk to individuals when using their personal data is always considered and steps are taken to mitigate those risks and restrict the collection or use of personal data to only the purpose it is being collected for.

#### **Mandatory Management Systems**

#### Protecting Unilever's information and property

- 2.8 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.
- 2.9 There are procedures and mechanisms in place to ensure that the appropriate consent has been obtained before disclosing Unilever's or another party's commercially sensitive or confidential information to third parties, or that of third parties to Unilever.



#### Data ethics and privacy

- 2.10 Standards, processes and governance are in place for the ethical use of both personal data and artificial intelligence technologies.
- 2.11 Business partners are transparent about how and why they collect, process, store, transfer and dispose of personal data, in a way that is understandable for people to make informed choices.
- 2.12 Business partners can show that when an automated decision is made that might impact people's lives, there is an explainable and ethical rationale for these decisions.







#### Sourcing and Manufacturing Products

Products and materials supplied to Unilever are appropriately and responsibly sourced and tested and meet agreed specifications.

#### **Mandatory Requirements**

#### Product specifications and quality

- 3.1 Products, materials and services meet agreed specifications (where the goods or services are covered by a specification) and quality and safety industry norms for such items, as well as such other quality and safety standards as agreed between us. They also comply with all applicable legal and regulatory requirements.
- 3.2 Suppliers to Unilever are responsible for meeting these specifications, quality and safety standards and for legal and regulatory compliance whether they are directly supplying the goods or services to Unilever or have sub-contracted the supply to a third party.
- 3.3 Where relevant, business partners conduct research and development activities responsibly, follow good clinical practice and generally accepted scientific, technological and ethical principles.

#### Animal welfare

3.4 Any animal testing previously conducted on existing products, product ingredients or materials supplied to Unilever, or to Unilever's collaborative manufacturers for Unilever's business, is disclosed.

- 3.5 Any animal testing previously conducted on new products, product ingredients or materials which they intend to supply to Unilever, or to Unilever's collaborative manufacturers for Unilever's business, is disclosed. This includes pre-existing products, product ingredients and materials, as well as those newly developed.
- 3.6 Agreement from Unilever is obtained before conducting any future animal testing on new or existing products, product ingredients or materials to be or being supplied to Unilever, or to Unilever's collaborative manufacturers for Unilever's business.

#### **Responsible sourcing**

- 3.7 The business partner's own Code of Conduct, guidelines, policies and/or training are in place and readily available to workers to enable the business partner to meet or exceed the Mandatory Requirements of the RPP.
- 3.8 Business partners have their own Responsible Sourcing Policy, Supplier Code, Third Party Policy or similar policy that covers the equivalent principles to the RPP Mandatory Requirements for their own business partners. The business partner's policies place comparable requirements on its own business partners.



- 3.9 Where the provision of goods or services being sourced by Unilever is sub-contracted to another party, the business partner has in place a Code of Conduct or Responsible Sourcing Policy for these suppliers, consistent with the requirements of the RPP. In addition, there is a process to communicate this and to monitor compliance by these suppliers.
- 3.10 The business partner exercises and shows human rights and environmental due diligence. This should identify, prevent, mitigate and account for how it addresses and manages potential and actual adverse impacts that it may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships.

#### **Mandatory Management Systems**

#### Product specifications and quality

- **3.11** Procedures are in place to ensure that any product quality or safety concerns originating from the business partner, or its supply chain, are notified to Unilever without delay.
- 3.12 Supply and manufacturing partners have procedures in place to meet the Unilever requirements for external certification, where informed prior to contracting.

#### Animal welfare

3.13 Procedures are in place to ensure that Unilever is notified before any products, product ingredients or materials are to be tested on animals – either existing or future products, product ingredients or materials.

#### **Conflict minerals**

3.14 Where applicable to sourcing activities, supply chain diligence and reporting procedures are in place with regard to minerals which may come from conflict-affected or high-risk areas, including areas for which applicable laws provide reporting requirements and/or usage, import or export restrictions (so-called 'conflict minerals').

#### **Future Mandatory Requirements**

#### Animal welfare

**3.15** Business partners supplying eggs or egg ingredients will only supply from cage-free egg sources.

#### **Leading Practices**

#### Animal welfare

- 3.16 Modern non-animal science and technology is used for assessing product, product ingredient and material safety and for regulatory compliance, upholding the principle that any animal testing is a last resort.
- 3.17 Advocacy in the public domain is engaged in, promoting the use of non-animal science and participating in consortia working for regulatory change to end animal testing.

#### **Responsible sourcing**

3.18 All business partners have in place a Code of Conduct or Responsible Sourcing Policy for their own supply chain, at least consistent with the requirements of the RPP. In addition, there is a process to communicate this throughout their supply chain and to monitor compliance.





Freely Agreed Terms of Employment Work is conducted on the basis of freely agreed and documented terms of employment.

#### **Mandatory Requirements**

- 4.1 All workers, both permanent and casual, are provided with employment documents that are freely agreed and which, at a minimum, respect their legal and contractual rights.
- 4.2 Key components of the employer–worker relationship, including hours, overtime, pay, benefits, leave, and disciplinary and grievance systems, are freely agreed by the worker; documented in writing; and formally acknowledged by the employer and worker before the start of employment.
- **4.3** Terms and conditions of employment are in a language understood by the worker, are explained verbally or diagrammatically if required, and available throughout employment.
- 4.4 All workers receive a copy of their terms and conditions of employment in a language they understand for their records that matches those the employer has on file.
- **4.5** Any changes to the terms and conditions of employment are agreed in writing by both worker and employer.
- **4.6** Where required by law, short-term, casual or agency workers are hired as permanent employees where the work involved is of a regular nature and is required all year round.
- **4.7** Workers are entitled to maternity, paternity, adoption or parental protection, leave and benefits as required by law.

#### **Mandatory Management Systems**

- **4.8** Key management functions such as hiring and contracting, grievance management, discipline, promotion and employment termination have clear policy frameworks, procedures for implementation and training of those responsible for implementing them, with appropriate documentation kept.
- 4.9 There is a clear and transparent system of worker and management communication. Employees are provided with information relating to any decision that changes or affects their terms of employment and have the right to effective dialogue with management.

#### **Leading Practices**

- **4.10** All short-term, casual or agency workers are hired as permanent employees where the work involved is of a regular nature and is required all year round, regardless of legal requirements.
- **4.11** Ongoing training is provided for all workers to raise and broaden their skills to enable them to advance in their employment.
- **4.12** Policies for family leave recognising all family types are created and implemented.



#### Free from Discrimination

XØ

All workers are treated equally and with respect and dignity without any form of discrimination. Particular attention is paid to the rights of workers most at risk of discrimination.

#### **Mandatory Requirements**

- 5.1 There is no discrimination in employment (including hiring), any aspects of training, personal and professional development, compensation, advancement, discipline, employment termination or retirement.
- 5.2 Discrimination based on race, ethnicity, age, role, sex, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership, personal characteristics, disease, health status or political views, or on any other grounds stated by local law is prevented.
- **5.3** Engaging in, supporting or tolerating discrimination is prohibited.
- 5.4 Pregnancy testing, other forms of health screening that might result in discrimination, and mandatory contraception use are not tolerated. When health tests are mandated under local laws, the results cannot be used to dismiss workers or otherwise discriminate against them or treat them unfavourably.

#### **Mandatory Management Systems**

5.5 Policies and procedures are in place that prohibit discrimination in any form during the recruitment, compensation, access to training, promotion, employment termination or retirement processes and these are clearly and regularly communicated to all workers, including management.

- 5.6 Selection criteria for all human resource decisions are objective and transparent and controls are in place to ensure these criteria are followed.
- 5.7 Procedures are in place to ensure that job vacancies are not described in terms that could exclude a group, or groups, of people, other than based on the skills, occupational requirements or training needed to perform the work.
- **5.8** Those responsible for hiring, paying, training, promoting, disciplining and terminating the employment of workers are trained to avoid discrimination in the exercise of their duties.
- **5.9** All workers, and specifically managers, supervisors and site security, are trained to avoid discrimination.

#### **Leading Practices**

- 5.10 The effectiveness of training and policies and the identification of possible areas of discrimination are tested.
- 5.11 Policies and specific and measurable targets for achieving gender equality and diversity are set and implemented. Programmes addressing the needs of workers most at risk of discrimination (for example, under-represented communities, women or people with disabilities) are in place. They may cover areas such as flexible time options, child and dependant care and mentoring programmes.
- **5.12** Diversity criteria are included in the selection of new suppliers.



#### Free from Harassment

All workers are free from harassment and abuse. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation.

#### **Mandatory Requirements**

- 6.1 Workers are treated with dignity and respect. Physical, sexual, verbal or psychological abuse, any form of harassment, hate speech, intimidation, bullying, violence and corporal punishment are not engaged in or tolerated.
- 6.2 Disciplinary measures are proportionate and do not include physical or mental punishment.
- 6.3 All workers, and specifically managers, supervisors and site security, who subject workers to harassment or abuse are subject to appropriate disciplinary measures.
- 6.4 There is zero tolerance of any abuse, threats, intimidation or reprisals against human rights defenders.

#### **Mandatory Management Systems**

- 6.5 Policies and procedures are in place that prohibit any form of harassment or abuse and are communicated clearly to all workers, with regular training on how to recognise and prevent harassment and other forms of intimidation.
- 6.6 Written disciplinary procedures are communicated and explained clearly to all workers and records of all disciplinary actions are documented for the duration applicable by law.

#### **Leading Practices**

- 6.7 Programmes to increase safety for women and reduce gender-based violence both for workers and women in the community are created and implemented.
- 6.8 Assessments are made with harassment prevention in mind when building teams including consideration given to the importance of supervisory roles. This includes providing specific sensitivity training to managers or supervisors dependent on the demographic profile (for example gender and race) of the workforce.
- 6.9 Distinct procedures for cases involving sexual harassment or assault are available. Those procedures take account of the potential trauma and risks involved and make provision for counselling and other support to survivors, as needed.





#### Work is Voluntary

Employment is accepted and work is conducted on a voluntary basis.

#### **Mandatory Requirements**

- 7.1 Under no circumstances will forced labour be used, whether in the form of trafficked labour, indentured labour, bonded labour or other forms including mental and physical coercion, and slavery.
- 7.2 Workers enter employment freely and are neither required to surrender any identity or personal papers nor pay a deposit in relation to their employment.
- 7.3 Workers are free to terminate their employment after a reasonable notice period without penalty, as agreed in the terms and conditions of employment.
- 7.4 Workers have freedom of movement and are not confined to the business partner's premises, including dormitories or provided housing.
- 7.5 Workers are not required to pay a fee or deposit in connection with obtaining employment, to the employer or to any person, company or agency involved in the recruitment process.
- 7.6 Employers are responsible for the payment of all fees and expenses in connection with a worker obtaining employment or incurred in connection to the worker performing their duties. If workers have paid any fees, these must be reimbursed by the employer.
- 7.7 The use of prison labour is prohibited except in circumstances where their terms and conditions of employment uphold the Mandatory Requirements of this policy and can be verified.

#### **Mandatory Management Systems**

- 7.8 There are hiring policies in place and employees trained in human resources procedures to ensure that workers are entering into employment freely and that they are not prevented from leaving if they so wish.
- 7.9 Workers relocating for a job, either internationally or domestically, are made aware of the terms and conditions as well as their rights, via pre-departure and post-arrival trainings or other acceptable means, in a language that they understand.
- 7.10 Effective and transparent processes are set up to ensure that workers have freedom of movement and are not confined to the facility's premises, including worker accommodation and transportation to or from the place of work (where either is provided). Such processes extend to the role and responsibility of security employees, where present.
- 7.11 Policies and procedures are in place and implemented to identify, prevent and remediate any potential cases of recruitment fees paid by workers, including through selection and monitoring of recruitment agencies or labour brokers.

#### **Leading Practices**

- **7.12** Sector-wide initiatives to promote ethical recruitment are participated in.
- 7.13 Initiatives to support survivors of human trafficking are supported.



#### Appropriate Age

All workers are of an appropriate age and young workers are protected.

#### **Mandatory Requirements**

- 8.1 Under no circumstances are individuals employed under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher.
- 8.2 Responsible remedial measures are immediately implemented whenever any workers under the age of 15 are identified. These measures include immediately removing the child from all work and ensuring they are in a safe environment. Care and education of the child should be provided along with security of the same income to the family.
- 8.3 In all circumstances, the health and safety of young workers (between 15 and 18 years of age) 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, ensuring that they must not do work that is mentally, physically, socially or morally dangerous or harmful.
- 8.4 The goals and requirements set out in the International Labour Organization Worst Forms of Child Labour Convention are met.

#### **Mandatory Management Systems**

- 8.5 An employment policy (which covers all workers, including those recruited directly or via an agency or third party) is in place, specifying the minimum age for all workers as well as remediation measures if there is an incident of child labour detected which includes care, education and income replacement. The policy should also outline the conditions under which young workers can be employed.
- 8.6 An effective age verification process, that includes proper documentation and record keeping systems, is in place in the workplace.
- 8.7 All relevant workers are trained to respect the provisions for young workers, inclusive of apprentices and interns, especially with respect to hours of work, night shifts, working hours during school terms and heavy or dangerous work.

#### **Leading Practices**

8.8 Community-building activities that help reduce barriers to access to education are supported. These activities include working with local government to enable greater school provision, providing workers with an allowance for school expenses, funding school expenses, supporting safe transportation to schools and providing vocational training.



#### Fair Wages

All workers are paid fair wages.

#### **Mandatory Requirements**

- 9.1 All workers are provided with a total compensation package for a standard working week that includes wages, overtime pay, benefits and paid leave which meets or exceeds legal minimum standards.
- 9.2 Compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
- 9.3 Wages are paid, on time, regularly and in full.
- 9.4 Workers receive a pay slip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, specifying regular and overtime hours worked (where workers are paid on an hourly basis) and benefits, incentives/bonuses and any agreed deductions.
- 9.5 Where a worker is paid based on volume output, piecerate, quotas or similar, the pay rate allows the worker to be able to earn at least the equivalent of the minimum or collective agreement wage, whichever is higher, during normal working hours.
- 9.6 All overtime work or work on statutory holidays is paid at the appropriate premium rate according to local legal requirements and/or collective bargaining agreements.

- 9.7 Other than legally mandated deductions, all other deductions from wages are made only with the express and written consent of the workers in a language they understand.
- 9.8 All legally mandated deductions, such as taxes and social or health insurance, are deposited each pay period in the legally stipulated accounts or agencies and as required by law.
- 9.9 Insurance is taken to cover workers in the case of any workrelated injuries, accidents, illness, invalidity and death in accordance with local worker compensation laws, as a minimum.







#### **Mandatory Management Systems**

- 9.10 A written policy on wages and compensation is in place, transparent and explained to all workers in a language they understand.
- 9.11 A process to understand legal requirements for wages, overtime pay, benefits, holidays and deductions and to monitor any changes to these, is in place and implemented.
- 9.12 Records are maintained that demonstrate that workers are paid accurately for standard and overtime hours worked, based on an appropriate hours and wages system.

#### **Future Mandatory Requirements**

- 9.13 All workers of business partners directly providing goods and services to Unilever must earn at least a Living Wage or Living Income. A Living Wage must be achievable within normal working hours (not including overtime), whether the worker is paid on a salary, hourly or volume output/ piece-rate/quota basis.
- 9.14 A Living Wage approach is implemented and updated annually to ensure that all workers receive wages (or appropriate portion of income) meeting or exceeding the localised Living Wage as defined by one of the methodologies recognised on the <u>Unilever Living Wage</u> web page.

#### **Leading Practices**

- 9.15 A best practice fair compensation system is in place for all workers that categorises them according to qualifications, skill and experience; recognises and rewards them for performance through wage and non-wage benefits and/or incentives; and regularly assesses and adjusts pay according to relevant market benchmarks and business performance and engages in regular social dialogue on compensation questions.
- 9.16 Living wage and/or living income requirements are cascaded to suppliers and to their upstream supply chain.
- 9.17 Insurance for workers goes beyond work-related accident and invalidity to include unemployment, maternity, health and retirement.





#### **Reasonable Working Hours**

Working hours for all workers are reasonable.

#### **Mandatory Requirements**

- 10.1 Workers are not required to work more than the regular and overtime hours according to local legal requirements. Total weekly working hours including overtime must not exceed 60 hours for non-management workers even if local law would otherwise allow it, in order to prevent excessive physical and mental fatigue.
- **10.2** All overtime is on a voluntary basis. If the employment contract allows for contractual overtime, then workers expressly agree to it.
- **10.3** Workers are entitled to at least 24 consecutive hours of rest in every seven-day period, and to take legally required annual leave.
- 10.4 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 to ensure a minimum of two days' rest in every 14 days.
- **10.5** Workers are entitled to reasonable meal and rest breaks, which, at a minimum, must comply with applicable laws.

#### **Mandatory Management Systems**

- **10.6** Written policies are in place and implemented for regular working hours and overtime; the policies clearly state that overtime is voluntary.
- **10.7** The expected work hours and schedules are communicated to all workers in a language and format that they understand.
- **10.8** Workers' consent to perform overtime work is documented.
- **10.9** There are defined and effective mechanisms for recording, documenting and monitoring working hours and overtime for all workers, regardless of wage system (for example, piece-rate payment) or contract type.

#### **Leading Practices**

- 10.10 All workers, inclusive of management roles, do not exceed weekly working hours of 60 hours per week inclusive of overtime.
- 10.11 Workers are consulted on ways to reduce working hours, without compromising their ability to earn at least a living wage.
- 10.12 Working time arrangements allow workers to attend to family and personal needs (for example, time off for medical appointments and flexibility and agility in work hours/shift coverage) without being penalised.





#### **Freedom of Association**

All workers are free to exercise their right to form and/or join trade unions and to bargain collectively.

#### **Mandatory Requirements**

- 11.1 All workers can freely exercise their right to form or join a union of their choice, to seek representation and collectively bargain and do so without fear of intimidation, harassment or obtaining prior approvals, unless legally required.
- **11.2** Workers know and understand their rights, including any legal right to strike. No other worker, manager or other company representative impedes them in the enjoyment of these rights.
- **11.3** Collective bargaining negotiations are entered into in good faith when requested from any legally recognised representative group of workers and collective agreements are concluded and implemented.
- 11.4 Worker representatives are not discriminated against, and unfair labour practices do not take place against them because of their role as worker representatives. They have reasonable access to carry out their representative functions in the workplace.
- **11.5** Where local law sets restrictions on the right to freedom of association and collective bargaining, alternative forms of worker representation, association and bargaining are allowed.

#### **Mandatory Management Systems**

- 11.6 Clear policies and processes relating to freedom of association and collective bargaining in day-to-day operations are in place and clarify that a worker's choice to form or join a trade union will not compromise their equal treatment (including treatment relating to hiring, discipline, promotion, wages, hours, grievances or employment termination).
- **11.7** Regular training of workers, managers and site security guards is carried out to ensure a worker's right to associate freely and to ensure the effective right to collective bargaining and good industrial relations practice (including consultation and negotiation).
- **11.8** Clear rules governing the activities of recognised trade unions in the workplace are in place.

#### **Leading Practices**

- **11.9** When new policies and procedures are developed, worker representatives are engaged for input where possible.
- 11.10 Social dialogue and joint training with trade union or worker representatives are arranged to promote constructive labour relations (for example, health and safety training; training to prevent sexual harassment).
- 11.11 An assessment is undertaken to identify potential risks to workers' right to freedom of association and, if identified, measures to address the issue are taken.



#### Health & Safety

All workers operate in a safe and healthy work environment that identifies and reduces risks to prevent accidents, injuries and illnesses.

#### **Mandatory Requirements**

- 12.1 A healthy and safe workplace is provided to prevent accidents and injury, or illness (either physical or mental) arising out of, linked with or occurring in the course of work, or as a result of the employer's operations.
- 12.2 All workers and other people who enter business premises are clearly informed about the inherent dangers of the workplace and are provided with adequate knowledge and personal protective equipment to avoid such dangers, and there is clear and appropriate signage or information provided on how to evacuate in the case of an emergency.
- **12.3** All workers, visitors, and people who enter the premises to provide any operational services or deal with products are properly trained and informed about the appropriate actions to take should a health and safety incident occur.
- 12.4 All workers have easy access to free, potable drinking water.
- 12.5 Lavatories are clean and fully serviced, include hand washing facilities with running water and soap, and are accessible to all workers.

#### **Mandatory Management Systems**

**12.6** Clear and effective policies and procedures are in place for occupational health and safety and are updated regularly.

- 12.7 Occupational health and safety policies and procedures are widely communicated and cascaded effectively throughout the organisation, with a mechanism to ensure relevant information is provided to all visitors.
- 12.8 Regular and repeated safety training including evacuation drills is provided to all workers, including managers, supervisors, contract workers and security guards.
- 12.9 An effective Health & Safety Committee, with roles that are clearly understood by workers and managers, proportional to the size and risks of the work site, is in place. The Committee should identify, monitor and ensure improvement plans are implemented to reduce health and safety risks, in order to protect workers from work-related accidents, injury and illness.
- **12.10** A senior member of management is appointed to administer and oversee the safety plan for each work site.
- 12.11 The effectiveness of safety plans is regularly tested through drills and other means.
- **12.12** The structural integrity and fire safety of work sites are specifically and regularly assessed, and identified issues are addressed.
- 12.13 Operations are regularly evaluated for safety issues, including areas for equipment and worker housing, where provided.



#### **Leading Practices**

- 12.14 Company-wide goals to achieve zero accidents are actively monitored and reported on, while continuing to encourage transparent reporting of any incidents that occur.
- 12.15 A crisis management plan is in place, including contingency planning and prioritisation of the health and safety of workers.
- 12.16 Employers provide, and workers are encouraged to adopt and maintain, good health and safety practices which cover both mental and physical wellbeing.







Access to Grievance Mechanisms & Remedies

All workers have access to grievance mechanisms with fair procedures and remedies.

#### **Mandatory Requirements**

- **13.1** All workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and equitable resolution of issues which may arise as part of their working relationship.
- **13.2** The grievance mechanisms are in line with the UN Guiding Principles on Business and Human Rights and are well communicated and accessible in order to enable workers to report any issue.
- **13.3** The grievance mechanisms guarantee the confidentiality of any complainant unless permission is given by the complainant to disclose to a given person.
- **13.4** Those reporting a grievance or participating in any investigation of a grievance must not be retaliated against.
- **13.5** Grievances are fully addressed in an effective, timely and respectful manner, and escalated to and overseen by the appropriate level of management.

#### **Mandatory Management Systems**

- **13.6** There is a clear and documented process to address any grievance which ensures confidentiality (unless permission is given by the complainant to disclose to a given person).
- **13.7** There is a non-retaliation policy towards workers or whistle-blowers who report grievances, with specific measures to protect complainants from retaliation.
- **13.8** All employees are trained on the policy and procedures for handling grievances and managers are specifically trained to avoid recriminations and retaliation.

#### **Leading Practices**

- **13.9** Anonymised data on the receipt and handling of grievances is maintained and analysed to ensure the efficacy of grievance mechanisms.
- **13.10** Root causes of complaints and grievances and any related underlying patterns are identified, in order to make operational improvements where appropriate.
- **13.11** Grievance mechanisms are widely communicated and accessible in order to enable local communities to report to the company on any issue, in line with the UN Guiding Principles on Business and Human Rights.



#### Land Rights

The rights and title to the property and land of the individual and local communities, including indigenous populations, are respected. There is zero tolerance for land grabbing.

#### **Mandatory Requirements**

These requirements apply only to business partners involved in the acquisition, leasing or disposal of land and/or when land use is being changed, which can affect the rights of individuals or communities.

- 14.1 There must be no involvement in any form of land grabbing and there must be a zero-tolerance approach to land grabbing by others with respect to any land acquired, leased or used.
- 14.2 The legitimate land tenure rights of individuals, communities and indigenous populations, including customary and informal rights, are respected, and due diligence is undertaken to uphold their established rights to property, land and land use.
- 14.3 When a change in land use is planned, the environmental and social impact is assessed and appropriately addressed with the participation of affected communities and published in a format and language accessible to those affected communities.
- 14.4 Land acquisition, land-use planning, change and land development are managed in a way that complies with national laws and respects human rights, including customary rights to land and resources, whichever offers the greatest protection.
- 14.5 Women's right to land ownership and access must be recognised and respected.

14.6 Business partners actively seek and document the effective implementation of free, prior and informed consent (FPIC) each time land acquisition, land-use planning and change, or land development might affect the legitimate land tenure rights of local communities or affect land otherwise subject to collective legitimate land tenure.

#### **Mandatory Management Systems**

These requirements apply only to business partners involved in the acquisition, leasing or disposal of land and/or when land use is being changed, which can affect the rights of individuals or communities.

- 14.7 There are written policies on respecting the land rights of all legitimate land tenure holders affected by the business partner's operations, including a zero tolerance for land grabbing.
- 14.8 An ongoing operational due diligence process is in place to effectively identify, prevent, mitigate and account for any violations of land rights in the business partner's operations and how these are addressed and remedied.
- **14.9** Responsibility and sufficient resources are assigned to managing land rights issues and company–community engagement.
- 14.10 Individuals responsible for land acquisition or landuse changes are periodically trained on FPIC and fully understand how to identify and assess the impact of those acquisitions or changes.

#### **Leading Practices**



Responsible Partner Policy

- 14.11 Impact assessments data is disaggregated by gender, national origin, tribe or caste.
- 14.12 A public commitment is made to actively support responsible agricultural investments, full traceability and the UN Voluntary Guidelines on the Responsible Governance of Tenure.
- 14.13 Strategic Lawsuits Against Public Participation (SLAPPs) used to silence human rights and environmental defenders and civil society organizations that support affected rightsholders in legitimate activism are not engaged in.



Pillar 2 Human Rights >>>



lar

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

A risk-based approach should be taken by business partners to determine the environmental issues that present the greatest potential for an adverse impact in connection with their business. Fundamental Principle 15 outlines the Mandatory Requirements for holistic environmental management towards protecting and regenerating nature and is followed by two additional Fundamental Principles that address environmental issues where Unilever has the greatest opportunity to minimise negative impacts and maximise positive impact in the areas of climate, water, waste, zero deforestation and plastic. You may also identify further areas that are relevant to your businesses.







#### Protect and Regenerate Nature

<sup>7</sup> Business is conducted in a manner which protects, preserves and regenerates nature (including biodiversity) and ensures no deforestation or conversion takes place in connection with the supply of palm oil, soy, paper & board, and tea and cocoa materials. Water consumption is reduced, particularly in areas of high-water stress, and wastewater discharge is appropriately managed.

#### **Mandatory Requirements**

- **15.1** Current and valid legal permits and requirements relating to planning, development and business operations, with respect to the protection of the environment, nature and biodiversity, are held and complied with.
- **15.2** Applicable laws and permits relating to water including but not limited to water abstraction, water usage, surface water management and effluent discharge are complied with.
- **15.3** Direct suppliers of in-scope materials as defined in the <u>People & Nature Policy Guidelines</u> will only sell materials to Unilever sourced from places that are verified as deforestation and conversion-free, based on the applicable cut-off date according to the requirements of the <u>People & Nature Policy</u>.

#### **Mandatory Management Systems**

**15.4** An environmental management system is in place, and updated periodically, to identify and mitigate issues related to water management and wastewater discharge.

#### The following general management systems shall be in place in order to meet the Mandatory Requirements for each Fundamental Principle under the Planet pillar.

- **15.5** Environmental management policies and procedures are in place and implemented for issues that present significant environmental risks relating to your operations.
- **15.6** Due diligence policies and processes relevant to national and international sourcing requirements are in place and are implemented as required by applicable laws and regulations, and as advised or requested by Unilever prior to purchase, or as otherwise agreed in contract.
- **15.7** Training is provided to all relevant workers to ensure knowledge of and compliance with all necessary legal permits.
- **15.8** All required data is shared with Unilever where needed to allow Unilever to use that data (on an anonymised basis, where the reporting or requirements allow anonymity) to comply with the reporting and disclosure requirements of all relevant human rights, environmental protection and supply chain due diligence laws.
- **15.9** Relevant policies and procedures are widely communicated throughout your organisation, with appropriate training provided.

× A

ar



#### **Future Mandatory Requirements**

Applicable to suppliers of ingredients and formulations used in homecare, beauty and personal care products, when informed by Unilever:

- **15.10** Data on biodegradability of organic (carbon-containing) ingredients is made available to Unilever according to internationally recognised OECD test methods.
- **15.11** Organic (carbon-containing) ingredients and formulations are 100% biodegradable.

#### **Leading Practices**

- **15.12** Sustainability practices and performance improvement plans such as those described in <u>Unilever's Regenerative</u> <u>Agriculture Principles</u> (RAP) are embedded in all relevant business activities to address material environmental issues.
- 15.13 Applicable to suppliers of agricultural materials: <u>Unilever's</u> <u>Sustainable Agriculture Code</u> (SAC) and benchmarked SAC-equivalent programmes and standards are implemented.
- **15.14** Suppliers of agricultural materials identify and implement plans to manage biodiversity and ecosystem risks for operations in or near sensitive areas.

- 15.15 Applicable to suppliers of mined materials: requirements such as those defined in the <u>Code for Responsible</u> <u>Extraction (CORE)</u> or other equivalent standards are implemented.
- **15.16** A systematic review of sustainability practices and environmental management systems is undertaken regularly with support from independent experts and with the involvement of local communities to determine if appropriate policies and procedures are in place and effective.
- **15.17** Water abstraction and wastewater generation are measured and publicly disclosed.
- **15.18** In areas with a high level of water stress, water optimisation to address leaks and water wastage is established and advanced wastewater treatment is implemented.
- **15.19** Collective action to improve water security is engaged in, prioritising areas of water stress through implementation of the Alliance for Water Stewardship Standard.
- **15.20** Stakeholders across the value chain are engaged to improve biodiversity and ecosystem performance within and beyond site boundaries.

Plane



#### **Climate Action**

Greenhouse gas (GHG) emissions are reduced in line with the goals of the Paris Agreement and limits global warming to well below 2 degrees Celsius compared to pre-industrial levels.

#### **Mandatory Requirements**

**16.1** All applicable legal requirements are complied with and permits held with respect to GHG emissions management and reduction.

#### **Future Mandatory Requirements**

- 16.2 When requested, footprint data for product level GHG emissions for the materials sold to Unilever is shared for use by Unilever in public reporting and to authorities on Unilever's own GHG reduction targets. This should be done via an agreed methodology and include third-party verification.
- **16.3** An environmental management system related to GHG emissions reduction is in place, implemented and periodically updated to identify and mitigate GHG emissions.

#### **Leading Practices**

16.4 A public target and roadmap to reduce GHG emissions in line with the goals of the Paris Agreement and requirements of the GHG Protocol or equivalent standard are set, with progress publicly reported on at least an annual basis. GHG reduction targets are approved by the Science Based Targets initiative (SBTi), through: <u>https://sciencebasedtargets.org.</u>

- 16.5 Upstream suppliers are engaged with to reduce GHG emissions across the value chain, either directly or via participation in relevant industry groups that drive collaborative action on climate issues (within the bounds of competition law).
- **16.6** Carbon credits are used only for residual GHG emissions and after proven absolute reductions in line with SBTi and are reported separately from GHG reductions.



> Plane





#### Waste-free World

The generation of waste is reduced and zero waste to landfill is achieved. Plastic use and waste are reduced to help create a transparent and circular economy for plastics.

#### **Mandatory Requirements**

- 17.1 Applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors are complied with.
- 17.2 Waste is stored, handled, transported and disposed of in a way that protects the health and safety of people and also protects the environment.
- **17.3** All applicable legal requirements with respect to plastic feedstock sourcing, plastics production, storage, transport and end-of-life management are complied with.
- 17.4 Suppliers of post-consumer recycled (PCR) plastic conduct annual migration tests (according to Unilever's standard test method) to confirm the materials supplied to Unilever are within the approved limits for contaminants and appropriate records of these results are maintained. Any contaminant identified above the limit must be risk assessed and the result communicated to Unilever.

#### **Mandatory Management Systems**

**17.5** An environmental management system is in place and updated periodically to identify and mitigate issues related to waste management and reduction.

# Applicable to suppliers using plastic in their production processes:

- **17.6** Clear and effective policies and management controls appropriate to your operations are in place to manage plastic production, use and end-of-life treatment and these are updated periodically.
- 17.7 A process to identify and manage the potential adverse environmental impacts and risk (associated with plastic production, usage, reduction, collection and end-oflife management) appropriate to your operations and activities is in place. Appropriate procedures and controls to minimise the identified risks are implemented.

#### **Future Mandatory Requirements**

#### Applicable to suppliers of plastic packaging:

- **17.8** Suppliers of plastic packaging only supply plastic that is designed to be fully reusable, recyclable or compostable.
- 17.9 Suppliers of plastic packaging develop and disclose a plastics inventory to support the transparency and traceability efforts (related to plastics) of Unilever or other downstream parties. This includes relevant data such as virgin fossil-based content, post-consumer recycled content and detail on the ability of the plastic to be reused, recycled or composted.

< n

ar

# Unilever

Responsible Partner Policy

#### **Leading Practices**

- **17.10** No non-hazardous waste is sent to landfill sites or incineration without energy recovery.
- 17.11 Suppliers of packaging halve the amount of virgin plastic used and optimise the amount of recycled plastic.
- 17.12 Where no waste management local laws exist, steps are taken to ensure that waste management (including by waste management sub-contractors) is conducted in line with international best practices.
- 17.13 Business partners establish a long-term plan to practise the '5-R's of waste management: Refuse, Reduce, Reuse, Repurpose, Recycle.
- 17.14 Circular economy principles and approaches to building circular business models are developed.
- 17.15 For business partners where food waste is material, a public commitment is made that by 2030 they will halve food waste in direct operations. Baselines, targets and plans for delivery are set and data is disclosed through external indices.
- **17.16** Effective plastics usage, reduction, collection and recycling strategies are in place across the value chain.
- 17.17 Collaboration and partnerships with stakeholders (within the bounds of competition law) are set up to innovate plastic materials and improve end-of-life management with the aim of tackling plastic waste, aligning and developing industry systems, benchmarking and standards, and leveraging enabling technologies.



# Plane



- 1. Any failure to meet the Mandatory Requirements of our RPP of which the business partner is aware and which is not rectified in a reasonable timeframe should be reported to Unilever as soon as possible. Failure to do so will be a breach of our RPP.
- 2. We strongly support a culture of speaking up for both business partners and their workers without fear of retaliation against those who report actual or suspected breaches.
- 3. Business partners and their workers, communities and other stakeholders may report actual or suspected breaches of our RPP (including any failure by a Unilever worker or anyone acting on behalf of Unilever) to Unilever by phone or online. Reports can be submitted confidentially and anonymously (where permitted by law). For more information, click on <u>Raise a Concern</u> or access at: www.unilevercodesupportline.com
- 4. Unilever will investigate any concern raised and discuss findings with the business partner. The business partner shall assist with any such investigation and provide access to any information reasonably requested.
- 5. If remediation is required, the business partner will create and inform Unilever of their corrective action and implementation plans and timeline to effectively and promptly resolve the breach.

### **Implementation Tips**

- 1. Review your current policies, procedures and practices against the Mandatory Requirements to ensure you are not at risk of any breaches of our RPP.
- 2. Speak to your Unilever contact to discuss any areas you don't understand or share with us any challenges you may have in meeting the requirements of this Policy.
- 3. Familiarise relevant workers with our RPP and how to report suspected breaches to Unilever.





### Appendix

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

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Business Principles for Countering Bribery produced by Transparency International:
- International Chamber of Commerce Anti-Corruption Guide for SMEs
- <u>United Nations Sustainable Development Goals</u>
- Ethical Trading Initiative
- International Labour Organization: <u>www.ilo.org</u> 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

- <u>The International Labour Organization Convention on</u> <u>Abolition of Forced Labour</u>
- International Labour Organization Convention on Equal Remuneration
- International Labour Organization Convention on Discrimination (Employment and Occupation)
- International Labour Organization Declaration on Fundamental Principles and Rights at Work
- International Labour Organization Convention on Maternity Protection

**NOTE:** This Responsible Partner Policy supersedes and replaces our previous Responsible Sourcing Policy and Responsible Business Partner Policy. Any reference to our Responsible Partner Policy, RPP, Responsible Sourcing Policy, RSP, Responsible Business Partner Policy, RBPP and/or our Supplier Code in any documentation or contracts with the supplier is intended to refer to this Responsible Partner Policy.

For more information on our Responsible Partner Policy including a glossary and frequently asked questions, please visit <u>Unilever.com/responsible-partner-policy</u>. If you are a supplier, you can find more information on Future Mandatory Requirement timelines on the following website <u>www.unilever.</u> <u>com/suppliers/becoming-a-unilever-supplier</u>.