

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

