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RESPONSIBLE BUSINESS PARTNER POLICY

Table of Contents
Introduction
Conducting Business Lawfully and with Integrity
Respecting Terms of Employment and Human Rights
Commitment to Sustainability
Implementation Tips

RESPONSIBLE BUSINESS PARTNER POLICY
TABLE OF CONTENTS

Introduction.........................................................................................................................3
Conducting Business Lawfully and with Integrity..........................................................4
Respecting Terms of Employment and Human Rights..................................................6
Commitment to Sustainability.........................................................................................8
Implementation Tips..........................................................................................................9
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
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 workers\(^1\), 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.

\(^1\)The 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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