Unilever Code of Business Principles
2018 Summary

We expect everyone at Unilever to be an ambassador for our high ethical standards – what we call 'business integrity'. We want to create an environment where employees not only live our values in their own work but are vigilant in identifying potential concerns, and confident about speaking up in such situations.

Setting out our standards of behaviour

Our Business Integrity framework ensures that how we do business is fully aligned with our values and applicable laws and regulations in countries where we operate. It has three pillars:

- **Prevention** – we seek to embed a culture of integrity at all levels, in all geographies
- **Detection** – we encourage employees to speak up and give voice to their values
- **Response** – we have the tools to investigate and if necessary sanction confirmed breaches, and use what we learn to continually improve.

Our Code of Business Principles

Our Code of Business Principles (launched in 1995) and 24 related Code Policies (updated and also published externally in 2016) are at the heart of our Business Integrity framework. They help us put our values of integrity, respect, responsibility and pioneering into practice. They play a key role in setting out how we seek to ensure compliance with laws and regulations, protect our brands and reputation, and prevent harm to people or the environment.

The Code and Code Policies provide a framework of simple 'Musts' and 'Must Nots' designed to be readily applied by employees in their day-to-day work. They are mandatory for all employees and others working for Unilever, including our Board of Directors, and apply to all Unilever companies, subsidiaries and organisations over which Unilever has management control.

How do we respond to breaches of our Code?

Our market-based Business Integrity committees oversee investigations of all potential breaches of our Code and Code Policies, except where senior executives are involved. In such cases, our Chief Legal Officer and Chief Business Integrity Officer oversee investigations, regardless of where such executives are located.

In 2018 1,206 whistleblowing incidents were opened (defined as Code Policy cases raised). We closed 1,252 incidents across all areas of our Code and Code Policies, with 662 confirmed breaches. These are broken down per Code theme in the table overleaf.

The number of issues raised per 1,000 employees and substantiation rates benchmark well against available peer data, pointing to ongoing Unilever employee willingness to report integrity concerns. Our policy is to investigate all reported concerns, however they are raised, including minor ones. The number of confirmed Code Policy breaches reflects the high overall standards we set ourselves. We sanction

individuals as appropriate, including through warnings and coaching, and share learnings that help reduce the likelihood of material breaches occurring.

In 2018, we terminated the employment of 330 people, initiated 7 cases of legal action and issued 337 written warnings – with 97 employees receiving a downgrade in individual performance rating.

CODE OF BUSINESS PRINCIPLES: CODE CASES BY RELEVANT THEME	Opened in 2018	Substantiated in 2018
Governance Code Policies on Living the Code, Legal Consultation and Responsible Risk Management	63	44
Countering corruption Code Policies on Accurate Records Reporting & Accounting, Protecting Unilever's Physical & Financial Assets & Intellectual Property, Avoiding Conflicts of Interest, Anti-Bribery, Gifts & Hospitality and Anti-Money Laundering	518	333
Respecting People Code Policies on Respect, Dignity & Fair Treatment and Occupational Health & Safety	536	216
Safeguarding Information Code Policies on Protecting Unilever's Information, Preventing Insider Trading, Competitors' Information & Intellectual Property, Personal Data & Privacy and Use of Information Technology	70	57
Engaging Externally Code Policies on Responsible Innovation, Responsible Marketing, Responsible Quality, Responsible Sourcing, Fair Competition, Contact with Government, Regulators & NGOs, Political Activities & Political Donations and External Communications - the Media, Investors & Analysts	19	12
Total	1,206	662

How do we train our employees on business integrity?
Everyone who works at Unilever should know our Code and Code Policies and understand how to apply them in their work.

ⓘ Our training

Employees are regularly asked to complete business integrity training.

Our learning materials are regularly updated and are available both online and for face-to-face awareness and learning sessions. They are designed to highlight key risks and are available in numerous languages. Materials target not only office-based employees, but also those working in factories and more remote areas.

A certain level of training is mandatory for all Directors and managers, including corporate leaders such as our Chief Executive Officer and Unilever Board Members. Completion of training is tracked through our online learning platform and other tools. We follow up with employees who fail to complete mandatory training and take further action where required.

Our Business Integrity team and subject matter experts further support operational teams to develop additional materials tailored and timed to meet local needs. We seek to provide advanced guidance on specific areas covered by our Code Policies for employees in higher risk positions. We monitor and benchmark our approach to ensure continuous improvement.

The table below shows individual training sessions for our employees who have access to our online training resources. In addition to the numbers below, we provide training to our employees without access to our digital tools, for example through face-to-face training, as well as to our third parties.

CODE OF BUSINESS PRINCIPLES: ONLINE TRAINING	Sessions in 2018
Countering corruption Code Policies on Accurate Records Reporting & Accounting, Protecting Unilever's Physical & Financial Assets & Intellectual Property, Avoiding Conflicts of Interest, Anti-Bribery, Gifts & Hospitality and Anti-Money Laundering	168,469
Respecting People Code Policies on Respect, Dignity & Fair Treatment and Occupational Health & Safety	56,635
Safeguarding Information Code Policies on Protecting Unilever's Information, Preventing Insider Trading, Competitors' Information & Intellectual Property, Personal Data & Privacy and Use of Information Technology	109,248
Total	334,35

For further detail, see Business integrity.