

Living the Code (1 of 2)

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

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

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

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

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

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

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

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

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

Musts

All [employees](#) must:

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



Living the Code (2 of 2)

Musts

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

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

In addition, those at Manager level and above must:

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

Must nots

Employees **must not**:

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

