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Collaborating on human rights across our value chain and beyond

At Unilever, we recognise our responsibility to uphold respect for human rights in our value chain and beyond. With 2022 troubled by major geo-political instability, a global cost-of-living crisis, global supply issues and an escalating sense of urgency on the dual crises of climate change and social inequity, the need to partner with others and work together to ensure respect for universal human rights has never been greater. Given Unilever’s global network, with an annual spend of over €41 billion on materials and services, and working with approximately 52,000 direct suppliers in 150 countries, we recognise the scale of our impact and the opportunity we have to realise positive change through our partnerships.

Building on our 2021 progress report, this interim report provides a short update on how, during 2022, we have collaborated with suppliers, industry peers, civil society and governments to strengthen our human rights due diligence and continued to drive efforts for systemic change. By innovating with new technology partners, working with external experts, engaging in multi-stakeholder partnerships and joining teams on the ground to roll out programmes that support the livelihoods of local communities, we continue to work to leverage the collective knowledge, networks and capabilities of our partners and peers to create scalable solutions that drive positive impact.

Ensuring a relevant approach: 2022 policy updates

To embed respect for human rights throughout our business, we rely on a strong policy framework, which we keep under review. More information on our commitment and policy framework can be found here. In 2022, we worked on three key policies: our overarching Human Rights Policy Statement, our Responsible Partner Policy (RPP) and our Human Rights Defender Policy.

Human Rights Policy Statement

Our Human Rights Policy Statement contains the overarching principles relating to respect for human rights which we incorporate into our policies and systems. In 2022, we updated our Human Rights Policy Statement. Updates included specifically calling out our salient human rights issues and referring to the importance of human rights defenders, with greater detail on our responses to concerns raised and calling out the intersection between social and environmental issues.

Responsible Partner Policy

We launched our Responsible Partner Policy (RPP) in December 2022. The RPP brings together our supplier-facing Responsible Sourcing Policy (RSP) and our distributor- and customer-facing Responsible Business Partner Policy (RBPP) in a single comprehensive policy outlining our expectations and requirements for responsible business. It covers every partner we engage with, from packaging, goods and raw material suppliers to service providers such as creative and media agencies, and our distributors and customers. The RPP defines the Mandatory Requirements, Mandatory Management Systems and Future Mandatory Requirements that partners must meet – or exceed – to do business with us.

Our requirements are set out as 17 Fundamental Principles which we organise under three interconnected pillars: Business Integrity & Ethics, Human Rights and Planet.
The RPP brings a greater focus on due diligence and we have strengthened the requirement for our partners to cascade requirements up their own supply chains. The inclusion of Management Systems aims to help us address the root causes of potential issues of non-compliance, and we have extended the scope of the RPP beyond our Tier 1 suppliers to address risk more broadly across our value chain. We have also strengthened some of our requirements. For example, under the Human Rights pillar we have introduced a new ‘free from harassment’ Fundamental Principle, a topic that previously fell within our ‘free from discrimination’ Fundamental Principle. There is also a significant change to requirements on our ‘working hours’ Fundamental Principle, moving from requiring suppliers to meet local legal requirements to the stricter criteria of either the local legal requirement or a maximum of 60 hours per week for those in non-management roles.

For more on our RPP, visit Human rights in our value chain.

Human Rights Defender Policy

Human rights defenders are defined by the UN Office of the High Commissioner for Human Rights as “any person who, individually or with others, acts to promote or protect human rights in a peaceful manner”. As we continue to promote respect for human rights in line with the UN Guiding Principles on Business and Human Rights, Unilever is developing a Human Rights Defender Policy, guided by the UN Declaration on Human Rights Defenders. Within this policy, we commit to respecting the rights of all individuals and communities who are defenders of human rights and who commit to implement the recommendations of the Business Network on Civic Freedoms and Human Rights Defenders, of which Unilever is a signatory. Our Human Rights Defender Policy will be published later in 2023.

Embedding respect for human rights – our governance

At Unilever, we have established areas of global expertise to provide guidance and support on human rights-related issues within, for example, our Sustainability function (SF), Business Operations (BO) and Responsible Business (RB) (Business Integrity) team.

The Global Head of Sustainability (Human Rights) reports directly to the Chief Sustainability Officer, who in turn reports to the Chief Executive Officer (CEO). Our SF, BO and RB teams work together to create action plans to respond to our salient human rights issues, including capability building and, where needed, remediation. These experts work to prevent the reoccurrence of human rights breaches while engaging with internal and external partners to continuously identify emerging human rights risks. For more on how we receive, process and respond to complaints or breaches to our policies, please visit our Business Integrity page. More information on how the CEO and board engage on our human rights issues can be found in our Human Rights Policy Statement.
Our salient human rights issues
How collaborative action is unlocking progress for our business and the wider industry

The UN Guiding Principles on Business and Human Rights define salient issues as “the human rights that are most at risk of the most severe negative impacts through a company’s activities or business relationships”. In 2015, we identified eight salient human rights issues: discrimination; fair wages; forced labour; freedom of association; harassment; health & safety; land rights; and working hours. More information on our salient issues framework can be found here. Our salient human rights issues are currently undergoing a review, and we will share the findings from this review later in 2023.

Across our salient issues, we recognise the importance of collaboration. We work closely with others to improve the way we review and manage risk; for example, we are partnering with external experts to develop and pilot innovative data-driven tools that will strengthen our approach to due diligence and effective remediation. In 2022, we continued our focus on forced labour, harassment and fair wages.

Eradicating forced labour
How our industry partnerships and alliances are helping us to better detect, prevent and remediate forced labour issues

In 2021, we began implementing a three-pillar action plan to address issues related to forced labour, in particular the payment of recruitment fees by workers. This action plan looked at three key areas: detection, prevention and remediation. In the following section we detail how we have worked with industry peers, suppliers and our procurement teams to drive impact in these areas in 2022:

- **We were one of six global consumer goods companies**, co-ordinated by AIM-Progress, to sponsor the training of over 80 businesses in the Gulf to help them improve their employment practices. The training aimed to develop long-term solutions to problems with labour practices in the region, so more suppliers can meet the standards required by global businesses, in particular focusing on improving employment practices and tackling the risk of migrant worker exploitation.

- **We continued our collaboration with the Mekong Sustainable Manufacturing Alliance** in the second year of a three-year programme funded by the United States Agency for International Development (USAID), Institute for Sustainable Communities (ISC), ELEVATE and the Asian Institute of Technology. As part of the initiatives implemented by the Alliance, three Unilever manufacturing suppliers, based in Thailand and covering more than 5,500 workers, participated in technical assistance programmes that provided training and tools to review fee remediation plans, migrant worker protection and grievance mechanism policies. By the end of 2022, these suppliers had completed tailored capability-building activities focused on these areas. In addition to our work with the Alliance, we have also held virtual training on responsible recruitment for 15 of our Malaysia-based suppliers to build understanding and capability in forced labour remediation.

- **We worked with peers** to create remediation guidance at an industry level, recognising the value of developing and embedding universal frameworks and processes. Unilever, together with fellow members of AIM-Progress and the Consumer Goods Forum (CGF) Human Rights Coalition (HRC), launched new practical guidance on the repayment of recruitment
This guidance acts as a tool to support corporate action against forced labour, specifically debt bondage. It sets out a clear framework to help businesses to ensure that their recruitment and employment practices observe the CGF’s Priority Industry Principles (PIPs).

- **We supported the CGF’s Human Rights Coalition launch** of the People Positive Palm Project (Project P3) alongside the International Organization for Migration (IOM), the Fair Labor Association (FLA), The Remedy Project and Impactt. Project P3 aims to foster collective action and advocacy to address forced labour within the Malaysian palm oil sector through a targeted, impact-based assessment and prevention and remediation training for key palm suppliers.

- **We partnered with diginex**, a company which specialises in building purpose-led technology for greater transparency on social risks in global supply chains, to pilot a project with AIM-Progress and peer members that helps suppliers to understand and address gaps in their responsible recruitment policies. The project involves rolling out diginex’s enhanced due-diligence platform diginexLUMEN and ‘worker voice’ tool diginexAPRISE (more information on these tools can be found in the following section relating to combatting harassment). In 2022, we began work in Thailand and Malaysia, with 12 suppliers, one recruitment agency, and over 200 workers engaged. In 2023, we will move to Phase 2, where we will be partnering with a number of AIM-Progress members to use our collective learnings from the baseline assessments to carry out tailored capability building with suppliers in Thailand and Malaysia.

- **We partnered with education technology company Quizrr to inspire behavioural change.** Quizrr’s digital learning platform, backed by real-time data, builds knowledge and drives awareness of workplace rights to instigate behavioural change in a bottom-up approach. We are piloting this tool in Thailand and Malaysia as part of a wider ethical recruitment programme, through which we seek to build capability at management and worker levels on key responsible recruitment and employment principles. In 2022, we trained 567 workers. Insights from our pilot will be available during 2023.

- **We engaged our procurement teams** who work closely with our suppliers to address risk in their operations and support remediation of key incidences. In 2022, we ran a series of capability-building sessions, for example sharing and explaining the Unilever supplier remediation guidance with 70 procurement managers and directors in the Gulf, Thailand and Malaysia. We also ran training sessions for procurement teams in the Middle East and North Africa focused on building understanding of Unilever’s position on responsible recruitment and the remediation steps included in our guidance.

A more comprehensive update on our overall progress on forced labour can be found in our Modern Slavery Statement (2023).

**Ending harassment**

**Leveraging partnerships and technology to prevent violence against women**

Having a gender-responsive, worker-led approach to supply chain due diligence is crucial, especially for sectors that rely heavily on women. In 2022, we partnered with reporting technology firm diginex to develop and pilot a gender-responsive due diligence programme aimed at helping suppliers identify where gender equality or women empowerment programmes would be most beneficial and to help mitigate harassment and
gender-based violence. This new gender programme was refined by the International Center for Research on Women (ICRW) and built into diginex’s supply chain due diligence platform, diginexLUMEN, a tool designed to improve transparency, understand risks and help to identify the root causes of social issues in global supply chains. The new gender module allows suppliers to conduct a self-diagnostic gender-gap analysis, using a Unilever-developed survey to identify areas that need attention. Crucially, the tool allows us to reach workers directly through an integrated ‘worker voice’ tool, diginexAPPRISE. This application is designed to be accessible for workers and allows us to collect standardised, actionable data directly from them. Results from both reports are then triangulated and analysed for insights.

We are working with Unilever’s tea suppliers in India and Indonesia¹ to pilot both technologies and understand how they can be used to advance gender equity, as well as identify what further support our suppliers may need. Our ‘worker voice’ tool provides an opportunity to hear from the workers who are most at risk on the ground, and in a way that helps give workers the confidence to report. We did find areas that needed improvement, for example a lack of literacy and digital access means that this approach may not enable us to reach the most marginalised groups in some geographies. We will continue to work on this with our suppliers and organisations on the ground. Early results from these pilots also indicate that there are issues not being identified through standard audit processes. We are working both with audit companies and our suppliers to understand these issues in more depth.

Harnessing industry-wide partnerships and working with women workers to create safer workplaces in our tea supply chain

In 2020, we launched the Women’s Safety Accelerator Fund (WSAF), partnering with industry stakeholders, such as IDH and the Ethical Tea Partnership, and retailers such as Tesco and brands including Twinings and Taylors of Harrogate, to create safer workplaces for women working in our tea supply chain.

With a combined investment of over €2.5 million to date, the fund’s goal is to expand the scale of UN Women’s Global Women’s Safety Framework in Rural Spaces so that all women and girls are socially, economically and politically empowered in rural spaces that are free from sexual harassment and other forms of violence. By December 2022, the WSAF had benefited more than 215,000 tea garden workers (145,000 women and 70,000 men) across 162 tea estates from 31 tea-producing companies in Assam and West Bengal with training and capability building. The training focused on improving understanding of the relevant laws, programmes and policies that promote the rights of women and girls in rural spaces. Our partner programme has provided opportunities for women workers to upskill and improve their representation in supervisory positions and unions that address issues of women’s safety, with over 3,200 women receiving specific leadership training. Over 425,000 community members have been reached through awareness programmes and 205 government officials and service providers have been engaged to strengthen the response of the external ecosystem to gender-based violence on the tea estates.

¹ For more on how priority countries have been identified, see our 2021 Human Rights Progress Report (page 12).
Working with suppliers to end gender discrimination

In 2022, we supported UNITE, the UN’s annual End Violence against Women initiative, bringing together government, civil society, the private sector and the UN to address violence against women globally. We used the campaign as an opportunity to mobilise our suppliers and encourage them to better understand how to mitigate the risks and impacts of gender-based violence and harassment, its impact on business and how to effectively detect, prevent and remediate incidences. We did this by crafting practical tools and guides which we shared as part of in-depth capability-training sessions for 91 strategic suppliers in Mexico and Brazil. In addition to our targeted supplier training, we created a gender integration e-learning module, which we translated into four languages and shared with over 2,000 suppliers in four high-risk markets – India, Indonesia, Mexico and Brazil. This e-learning module focuses on the importance of gender integration and of embedding a gender lens in business policies and programmes.

We recognise that serious allegations relating to gender-based violence in the tea supply chain in Kenya emerged shortly before publication of this report and we will ensure that we learn all lessons from the outcomes of investigations into this.

Earning a fair wage

We are committed to ensuring that everyone who directly provides goods and services to Unilever will earn at least a living wage or income by 2030

In 2021 we made our living wage commitment. It applies to all partners who provide a product or service directly to Unilever. In 2022, we finalised detailed roadmaps for each of our procurement portfolios (chemical suppliers, packaging suppliers, collaborative manufacturers, etc) to lay out the steps we need to take to reach our commitment. We prioritised those where we can have the greatest impact, for example suppliers closest to our own operations, those based in markets where we have a high spend and those in countries where the gaps between minimum wage and living wage are the highest.

Our 2022 implementation focus was to continue working with our collaborative manufacturing partners, prioritising those dedicated solely to Unilever, to create a joint plan for achieving a living wage in their operations and incorporating this within their contracts. We are working with suppliers to address potential cost impacts that may arise from implementing a living wage, for example working with them to improve productivity and by offering financial support. By the end of 2022, many of our dedicated collaborative manufacturing partners had confirmed that workers at their sites receive a living wage.

In 2022, we also stepped up our efforts to engage strategic suppliers through our Living Wage Partner Promise. The Promise, which was launched in 2021, is a declaration by our partners of their intention to work on identifying and addressing living wage gaps in their operations. By the end of 2022, 70 partners had signed the Promise.

We recognise that a systemic approach to addressing wages is paramount, and that it is vital for business, governments and NGOs to work together to drive meaningful change when it comes to wages and livelihoods. In 2022, along with Business Fights Poverty, Shift and Cambridge University, we sponsored a study called ‘The Case for Living Wages’. The report demonstrates the commercial case for action, showcasing how it increases worker productivity, reduces worker turnover, creates more resilient value chains and grows consumer markets. The report is part of our continued effort to drive accelerated action on living wage.
Payment of a living wage to workers at every stage of the supply chain lessens the likelihood of other human rights issues. We continue to address respect for other human rights connected to fair wages, for example gender discrimination (see previous section), working hours (see next section) and child labour. When it comes to child labour, we continue to collaborate with our NGO partners (International Cocoa Initiative, Rainforest Alliance, Afrique Secours et Assistance (ASA)) and suppliers, to identify children in or at risk of child labour and provide support. All dedicated cooperatives in our supply chain have monitoring and remediation systems in place that assess and address child labour cases. Where cases arise, we work with partners and suppliers on a case-by-case basis, for example helping to obtain birth certificates and supporting community-based initiatives such as child protection committees. We are also working closely with local government to support development of education infrastructure, such as school buildings and canteens, in communities where they are lacking.

**Case study: Achieving a living wage for workers on our collaborative manufacturing sites in Indonesia**

To broaden industry adoption of a living wage, Unilever Indonesia began working alongside local collaborative manufacturing (CM) sites in 2022 to support their adoption of living wages. In October 2022, our four largest dedicated CM sites confirmed they were fully compliant with the requirements of our living wage commitment. Reaching this milestone within a year of engagement was made possible through close collaboration between Unilever and supplier teams.

Myrza Tjondronegoro, Unilever Senior Procurement Manager, says, “Despite inflationary pressures, our CM partners have been very willing to work towards living wage, and to work holistically to mitigate any cost impact, showing true partnership in action.”

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**Working hours**

**Leveraging partner relationships to improve working hours**

Excessive working hours can have a negative effect on both worker health and safety and product quality. In 2022, we updated our requirement on working hours within our Responsible Partner Policy to ensure that all our partners adhere to tighter standards. We have moved from requiring local legal requirements to a requirement for partners to meet either the local legal requirement or a maximum of 60 working hours, whichever is stricter. This requirement is specific to workers in manufacturing roles and brings our policy into line with best practice.

We recognise that to have a 60-hour work week will be challenging in countries where legal requirements allow longer working hours. It will also be challenging in certain contexts where excessive working hours are viewed as the default. However, we know the desire to work overtime is closely connected with wages, with workers often doing so to compensate for insufficient hourly wages. It is therefore critical that requirements on working hours are considered and addressed alongside requirements for fair wages.

**Land rights**

**In 2022 we worked with land rights organisation Landesa to update our Land Principles and Guidelines**

Landlessness is a key predictor of poverty. Respecting stronger land rights can reduce poverty and conflict, increase economic activity, promote the empowerment of women and help to mitigate environmental and social risks. In 2017, with the support of non-profit organisation Landesa, we created our Global Land Rights Principles and Due Diligence Implementation Guidance, which we rolled out
across our own operations and used to put in place operating procedures and due diligence for all land transactions. In the light of more recent developments in international land rights standards, and in response to feedback from our suppliers, in 2022, we re-engaged Landesa to review and update our land principles and guidelines, ensuring they align with international best practice. These will be finalised during 2023, along with new guidance to support suppliers in the implementation of our principles.

Employing a multi-stakeholder approach to formalise land rights for cocoa farmers

In 2022, we continued efforts to help smallholder cocoa farmers in Côte d’Ivoire to formalise their land rights through an affordable land tenure documentation process. Thousands of smallholder farmers in Côte d’Ivoire have no legal or even written proof that they own their land. This puts them at risk of getting evicted at any time and prevents them from passing on an inheritance to their descendants. We are working together with the Côte d’Ivoire Land Partnership (CLAP), an initiative which brings together Unilever and other industry bodies, the Ivorian and German governments, and Meridia – a social venture that manages the implementation of the programme on the ground. CLAP members work to subsidise the cost of documentation and provide technical support to help farmers navigate the certification process. In 2022, 65 farmers covering 326 hectares of land secured their land rights and received over 130 land tenure documents as part of our pilot.

“I am so happy I got my land certificate! We used to do agricultural work on this land, but it needed to be secured. With the land certificate, I can invest in my land. In the future, it could help us to take out a bank loan to build our house. CLAP is a great project, as it offers land certificates at a lower price and with guarantees due to the participation of various partners. I told all my fellow farmer colleagues about CLAP to spark their interest to participate in the project.” – Aly KINDO, Unilever cocoa farm

Partnering with external experts on land conflict resolution within local communities and palm oil farmers

One significant barrier to the achievement of our NDPE (no deforestation, no peat and no exploitation) commitments has been social conflict in the form of land and resource rights disputes between palm oil plantation companies and indigenous peoples and local communities, including vulnerable groups – particularly women and ethnic minorities. To this end, Unilever commissioned The Forest Institute to undertake a study to understand the role of the private sector in supporting land conflict resolution in Indonesia. In 2022, The Forest Institute presented the findings from the study, with the support of Unilever, at a webinar jointly hosted by the Social Issues Working Group (SIWG) of the Palm Oil Collaboration Group (POCG) and the CGF Forest Positive Coalition, with the aim of prompting and exploring collaboration opportunities with all members of the industry groups. We will update on the output from these discussions in our 2023 report.
Commodity focus: Plastics

How we’re partnering with other FMCG companies to tackle plastic waste

We have set ambitious goals for our plastic use. We are rapidly scaling up the use of recycled plastic in our packaging, and by 2025 we aim to collect and process more plastic than we sell.

In 2022, Unilever joined Coca-Cola, Nestlé and PepsiCo, convened by the NGO Tearfund, in co-founding and launching the Fair Circularity Initiative in support of waste pickers in the plastics industry. According to estimates from the ‘Breaking the Plastic Wave’ report, as much as 60% of all the plastic that is recycled globally is collected by the informal waste sector but, despite their important role, waste pickers are often exposed to inadequate income, health risks, accidents and poor working conditions. They are also often excluded from decision-making processes that affect them.

By joining the Fair Circularity Initiative, we have agreed to advance and adopt the initiative’s 10 Fair Circularity Principles which bring to life the expectations and responsibilities outlined in the UN Guiding Principles on Business and Human Rights. Together with our partners, we will work towards implementing these in our plastic value chain, report annually on our progress and encourage others to join our efforts.

To kickstart our efforts we partnered with First Mile, a leading waste and human-powered supply chain development group, in 2022 to conduct a baseline study in four countries (India, Indonesia, Brazil and Ghana) to understand where our gaps lie. Using these findings, together with learnings from our work on the ground, we have worked with First Mile to create a draft human rights framework which we will start testing and implementing through a series of pilots in 2023.

Raising concerns and enabling access to Investigating internal code breaches

In 2022, we received 1,279 reports from whistle-blowers of breaches to our internal policies. We substantiated 554 in breach of our Code of Business Principles and related Code Policies, which led to 314 people leaving the business. Furthermore, we initiated 8 cases of legal action and issued 295 written warnings – with 83 employees receiving a written warning and appropriate financial consequences.

Out of the 1,279 cases, we investigated and closed 426 cases related to our Respect, Dignity and Fair Treatment Code Policy (RDFT) received through our hotline and online reporting systems. Of these, 152 (40%) were confirmed as breaches. In 2022, offensive/malicious behaviour and intimidating behaviour were the predominant categories of issues under RDFT, with a highest number of reported breaches coming from Latin America, North America and South Asia.

We analyse our case data (including both organisational and behavioural drivers at a geography level), carrying out regular targeted awareness-raising sessions and training. For RDFT violations, the most prominent root causes for violations were communication style and cultural differences.
Resources were created and deployed to relevant employee groups with training in two areas: ‘Identifying Bullying in the Workplace’ and ‘The Difference between Strong Performance Management and Bullying’. Trends seen through our RDFT cases were incorporated into annual training and ad hoc leadership initiatives to ensure we are setting the correct tone from the top.

**Continuing our collaborative human rights efforts during 2023**

Engaging with rights holders

Engagement with rights holders is critical for effective human rights due diligence. In 2022, we began collaborating with Oxfam, through the Oxfam Business Advisory Service, to strengthen Unilever’s engagement with rights holders, with a view to developing a framework of principles and approaches that can be used and applied by teams across our business. This will be piloted during 2023. We will also focus on grievance mechanisms and other ways that concerns and impacts can be raised and addressed.

Roll-out of Human Rights Impact Assessments (HRIAs)

We will build on our use of HRIAs, including those recently carried out in the US and Brazil, as an additional means of human rights risk and issue identification, with further assessments during 2023.

Continuing to work with tech partners to strengthen due diligence

We are currently developing training, with Quizrr, in Indonesia and India to facilitate capability building and education on workers’ rights and awareness of gender-related issues in the workplace. This will be rolled out during 2023. We are also partnering with technology firm IBM to co-create a cutting-edge technology solution that we hope will improve our understanding of upstream risk. We will begin an initial three-month pilot during 2023 to assess the feasibility and value of this technology.

Reviewing our salient human rights issues

Considering significant changes to our global landscape and changes to the way that we as a business operate, in 2022 we began conducting a review of our global salient human rights issues to identify how they may have changed or evolved over time. Our review process engages both rights holders and stakeholders, internally and externally. We will also be initiating regional saliency reviews as part of this. A reviewed and potentially revised list of global salient issues will be finalised during 2023.

Continuing to track and monitor our salient issues

Monitoring and tracking issues are a key part of measuring progress and effectively addressing our salient human rights issues. We recognise that we still need to do more to effectively track and report the impact of our work, including providing more data on notable trends or patterns in impacts related to a salient issue.

2022 audit data

Our 2022 supplier audit data will be published later this year. This helps us to improve our reporting by enabling us to report the previous year in full (rather than share part of our data from the prior year). We will also review the type of data that we are sharing as we continue to work to strengthen transparency.
APPENDIX 1: UN Guiding Principles Reporting Framework

This index provides the location of answers to the questions listed in the UN Guiding Principles Reporting Framework.

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