

Our Code

of Business Principles and Code Policies



Leading with Integrity

Unilever's commitment to doing the right thing has been a constant in my many years of working for the company.

Whilst I have always valued the freedom that Unilever has given me as an individual and as a leader, I have no doubts that our success as a collective, now and into the future, must be built on a set of shared principles on how we work together and a shared commitment to always doing business with integrity.

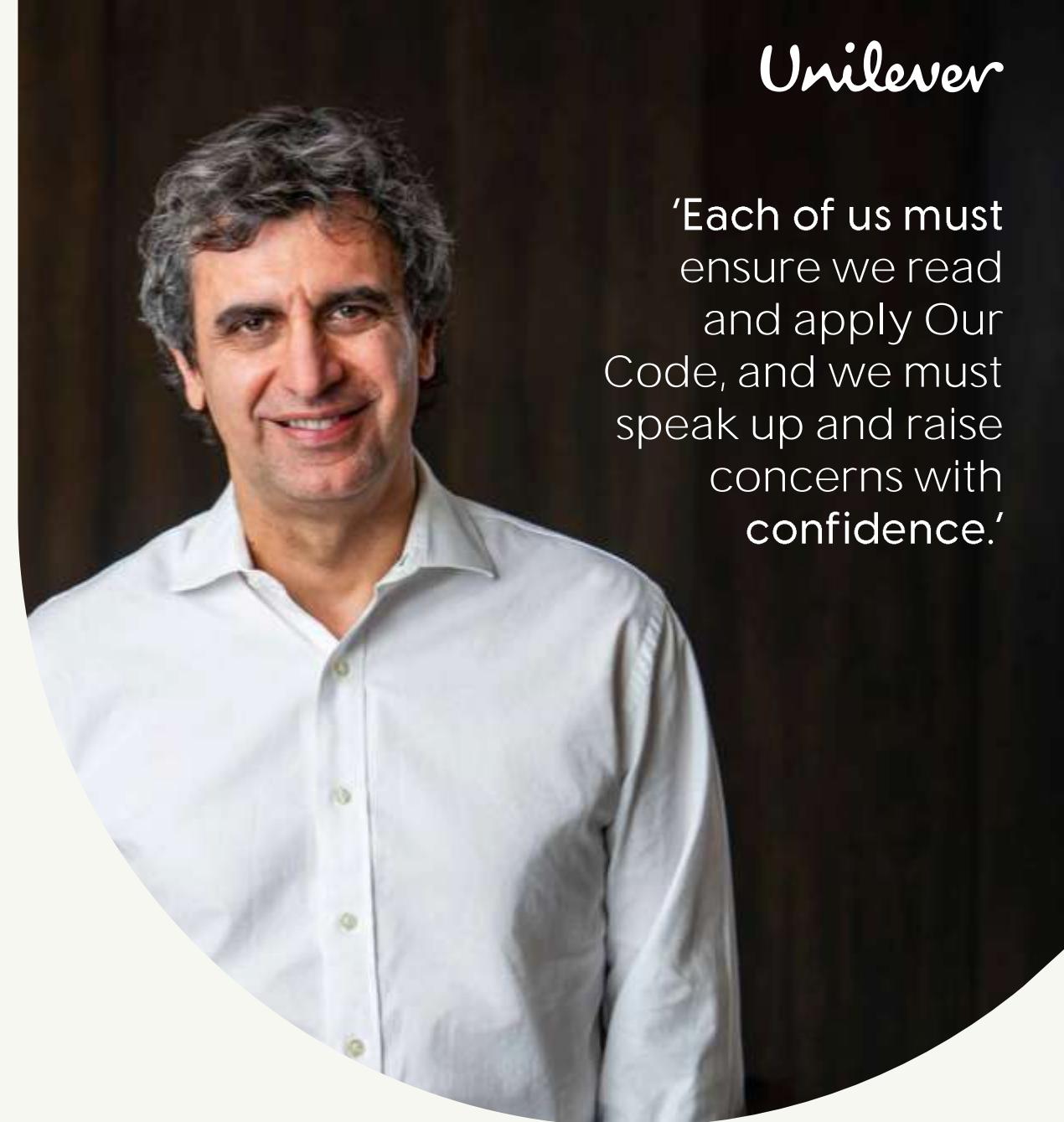
This important document sets out the standards of conduct we are all required to uphold both individually and collectively, and underpins the pivotal role all employees must play in fostering a culture of trust and integrity, whereby everyone feels confident to engage in courageous conversations and speak up when something isn't right.

This document exists to protect our people, our property, our reputation, the communities in which we operate, our consumers, customers and our partners right across our business. It exists to keep our company honest and courageous and enables us to deliver with excellence.

Each of us must ensure we read and apply Our Code, and we must speak up and raise concerns with confidence.

Thank you for living and upholding Our Code today and every day.

Fernando Fernandez
CEO



'Each of us must ensure we read and apply Our Code, and we must speak up and raise concerns with confidence.'

Welcome to Our Code

What is Our Code?

At Unilever, we believe in growing responsibly and sustainably. To do this, every employee must behave in ways that embody both our values – Integrity, Respect, Responsibility and Pioneering – and our behaviours. Our Code defines these non-negotiables, making clear what is expected from our people. Through living Our Code, we bring our values, behaviours, and purpose to life, every day, in everything we do.

Our Code consists of two parts:

- Our Code of Business Principles – which sets out the key principles that Unilever, including its employees and directors, must follow in their day-to-day roles.
- Our Code Policies – these build on the principles, explaining how we must behave in detail.

Why should I read and follow Our Code?

Most employees follow the rules because they want to do the right thing and look after their colleagues. Our Code helps them by clearly stating what the rules are. Breaching Our Code can lead to serious consequences like injuries, disciplinary action, fines, imprisonment, and reputational damage. Following it protects you, your community, and makes Unilever a better place to work.

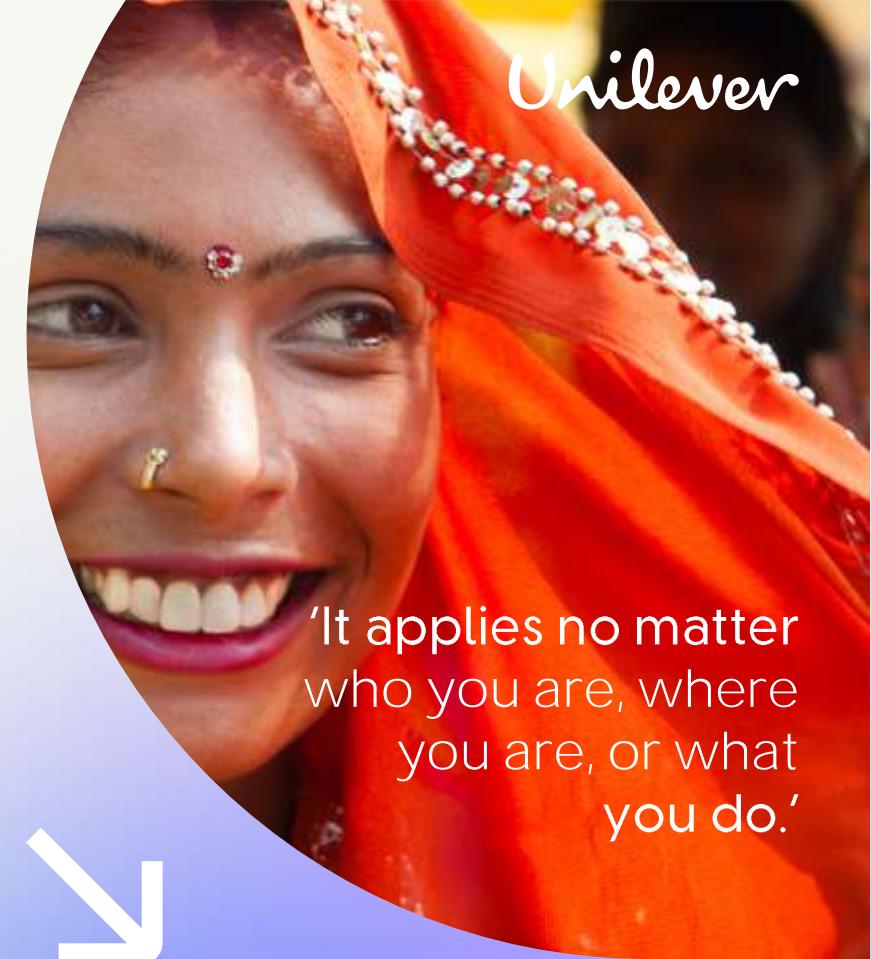
What must I do?

All employees must read Our Code on joining Unilever, and each time that it is refreshed, following it at all times.

Employees can return to it to seek help throughout their time at Unilever and are encouraged to contact Business Integrity should they have any questions. Employees must also report through Speak Up any potential or actual breaches of Our Code.

Day-to-day responsibility for implementing Our Code is delegated to all senior management of the business groups and functions at global, regional, and country level.

The Unilever Board and Executive Committee (ULE) have reviewed, approved, and committed themselves to Our Code. The Board of Unilever will not criticise management for any loss of business resulting from adherence to Our Code. Nor should any Unilever leader criticise any employee for similar actions. The Unilever Board and ULE are accountable for ensuring these principles are applied throughout Unilever.



'It applies no matter who you are, where you are, or what you do.'



Who is Our Code for?

Our Code is mandatory for all Unilever employees, management and directors¹.

It applies no matter who you are, where you are, or what you do.

¹An 'Employee' is defined as any individual in a direct employment relationship with Unilever according to national law or practice. A 'Director' refers to non-executive members of the Unilever PLC Board and other Unilever-controlled entities.

Code of Business Principles

Unilever, together with its employees, management, and directors, is committed to acting with integrity. This includes following these Business Principles:

Our Code and Behaviour

Countering Corruption

Respecting People

Safeguarding Information

Engaging Externally



Our Code and Behaviour

Living the Code

We act in line with our values, Our Code, and all Code Policies every day. We speak up when we see potential or actual breaches and do not tolerate any retaliation for speaking up.

Legal Consultation

We obey relevant laws and regulations and seek advice from Legal at key moments, including (amongst others), significant contract negotiations or conclusion, ongoing or anticipated legal action, and discussions with regulators.

Responsible Risk Management

We identify, assess, and manage the risks relevant to our roles.

Responsible Innovation, Safety and Quality

We design, make, and sell products based on sound science, technology, and responsible innovation, applying rigorous standards of safety and superior quality for consumers and customers.

Environment

We work to reduce our environmental impact and are moving towards net zero emissions, ending plastic waste, and building resilient and regenerative ecosystems.



Countering Corruption

Conflicts of Interest

We avoid conflicts of interest and immediately disclose when our personal interests or external commitments could conflict with Unilever's.

Anti-Bribery and Gifts & Hospitality

We do not give, accept, or request bribes of any type, including gifts, hospitality, donations, or sponsorships that are intended to inappropriately influence decisions or that are outside policy limits.

Political Activities and Donations

We do not support political parties or make political donations, unless in our own personal capacity.

Accurate Records, Reporting and Accounting

We ensure our accounts and reporting is accurate. We do not tolerate fraud or tax evasion. We ensure all transactions are based on valid documentation.

Protecting Unilever's Assets

We protect Unilever assets, guarding them from fraud and theft, and only approving activities within our personal limits. We safeguard Unilever intellectual property by ensuring Unilever brands and innovations are protected. We respect valid third-party intellectual property rights by obtaining the relevant licences and approvals.

Anti-Money Laundering and Economic Sanctions

We do not engage in money laundering and do not do business with any person or company subject to economic sanctions. We conduct business in compliance with all relevant trade controls.



Respecting People

Health and Safety

We comply with legal and Unilever Health and Safety Standards to ensure a healthy and safe workplace, aiming for continuous improvement.

Human Rights

We respect human rights and are committed to treat all employees with fairness and respect. We seek to create an environment that enables diversity, inclusion, equal opportunity, freedom of association, and collective bargaining. Unilever provides employees a living wage. We have zero tolerance for forced labour, including any form of compulsory, trafficked, or child labour.

Discrimination and Harassment

We have zero tolerance for sexual harassment. We do not tolerate discrimination based on protected characteristics, harassment, bullying, or offensive behaviour, either directly or indirectly. We provide a transparent, confidential, and fair way for employees to raise concerns or report unfair or discriminatory treatment and do not tolerate any retaliation for speaking up.



Safeguarding Information

Protecting Technology and Information, and Privacy

We ensure all of Unilever's digital assets are safe, used for work purposes, not used for inappropriate activities, and are properly maintained. We protect all forms of Unilever information by classifying, storing, securing, sharing, updating, and deleting it in line with our standards and relevant laws, including privacy and security.

Preventing Insider Trading

We do not trade or encourage others to trade securities, like shares, when in possession of inside information.



Engaging Externally

Responsible Marketing

We sell products that are accurately labelled, advertised, and communicated. We conduct marketing activities and research in line with societal expectations.

Fair Competition

We compete fairly and comply with all competition laws, always refusing to engage in any kind of anti-competitive practice.

External Engagements and Communications

We are trained and approved before speaking to brokers, analysts, shareholders, media, government, NGOs, or regulators.

Responsible Sourcing and Business Partnering

We select and work only with partners who are able to uphold standards consistent with our own commitment.



Code Policies

Here are our Code Policies organised as per our Code of Business Principles (CoBP). Click on a Code Policy to read the full description.

Our Code and Behaviour

Living the Code

Legal Consultation

Responsible Risk Management

Responsible Innovation

Product Safety and Quality

Countering Corruption

Avoiding Conflicts of Interest

Anti-Bribery and Gifts & Hospitality

Political Activities and Donations

Accurate Records, Reporting and Accounting

Protecting Unilever's Assets

Anti-Money Laundering and Economic Sanctions

Respecting People

Health and Safety

Respect, Dignity and Fair Treatment

Safeguarding Information

Protecting Technology and Information

Personal Data and Privacy

Preventing Insider Trading

Engaging Externally

Responsible Marketing

Fair Competition

External Engagements and Communications

Responsible Sourcing and Business Partnering

Living the Code

We act in line with our values, Our Code, and all Code Policies every day. We speak up when we see potential or actual breaches and do not tolerate any retaliation for speaking up.

Why it's important

Operating with integrity and accountability reinforces consumer trust and strengthens Unilever's reputation as a responsible company that delivers value, with values. Failure to follow Our Code could result in serious consequences, including disciplinary action, significant fines for Unilever, imprisonment for individuals, and reputational damage.

What must I do?

- **Understand** and comply with Our Code including all Code Policies.
- **Complete** mandatory training.
- **Seek** guidance from my line manager or Business Integrity if unsure about how to interpret policies or behaviours.
- **Report** breaches (actual or potential) of Our Code or Code Policies through our Speak Up channels: line manager, Human Resources, Legal, Business Integrity or the confidential hotline (phone and web).
- **Support** those who report concerns or breaches, taking their concerns seriously, keeping them confidential, assisting investigations, and making sure no one faces retaliation.
- **Report** to Speak Up channels honestly – dishonest reporting violates Our Code.

As a manager, what do I need to do?

- **Lead** by example, demonstrating integrity in everything I do.
- **Ensure** all team members have read and completed related training on Our Code and Code Policies.
- **Collaborate** with my Business Integrity Officer to address concerns, ensuring timely, and appropriate action is taken.

Where do I go for more information?

- Speak Up Standard
- Business Integrity, Legal, HR
- Global Policy Portal
- Speak Up hotline



Legal Consultation

We obey relevant laws and regulations and seek advice from Legal at key moments, including (amongst others), significant contract negotiations or conclusion, ongoing or anticipated legal action, and discussions with regulators.

Why it's important

Seeking advice from the Unilever Legal function ensures that all transactions, contracts, and business operations meet regulatory requirements and demonstrate ethical business conduct. It also protects the organisation from potential legal disputes, financial losses, and reputational damage.

What must I do?

- **Notify** my line manager immediately and seek legal advice from my Legal Business Partner if I identify a legal risk or suspect any illegal activity in relation to:
 - Commercial contracts, leases, licenses, and transactions.
 - Legal or regulatory action such as employment disputes and contractual disagreements.
 - Communication with government or regulatory bodies.
 - Competition law matters.
 - Press communication, especially that impacts Unilever's reputation, creates legal liability, or contains "inside" or "price sensitive" information.
 - Claims, marketing materials and intellectual property matters involving brands, trade marks, designs, patents, trade secrets and supplier contracts involving IP.
 - Employment-related issues, including non-compete obligations, employment disputes and terminations, and non-routine contract terms.
- **Consult** my Legal Business Partner before engaging external legal professionals and consultants.
- **Ensure** all contracting activities are reviewed by my Legal Business Partner in line with the Contracting Standard.
- **Follow** any actions as advised by the Legal function and do not do anything that they have said is unlawful.
- **Obtain** senior line management authorisation before proceeding with any activity that the Unilever Legal function has highlighted as significantly risky for Unilever.



Where do I go for more information?

- Legal Business Partner
- Global Policy Portal for Legal Standards



Responsible Risk Management

We identify, assess, and manage the risks relevant to our roles.

Why it's important

Risk management is essential to Unilever's ability to deliver on its strategy and long-term goals. Understanding and addressing risks – from global to local, strategic to operational – helps us make better decisions, comply with regulations, protect the business, and create value.

As a manager / senior leader / project leader, what do I need to do?

- **Identify** and define risks, taking ownership for mitigating actions.
- **Escalate** significant risks to relevant leadership.
- **Complete** an annual holistic business risk assessment that identifies key risks and how they are managed.
- **Monitor** risks on a continuous basis and not just as part of the annual risk management process.



Where do I go for more information?

- Global Risk and Controls Director
- Risk Management Hub



Responsible Innovation

We design, make, and sell products based on sound science, technology, and responsible innovation, applying rigorous standards of safety and superior quality for consumers and customers.

Why it's important

Innovation is fundamental to Unilever's success. Our ability to meet consumer needs and address global challenges depends on responsible, safe, and sustainable research and innovation. Integrity, objectivity, and high ethical standards are also essential to earn trust and ensure our long-term impact is positive for consumers and society.

What must I do?

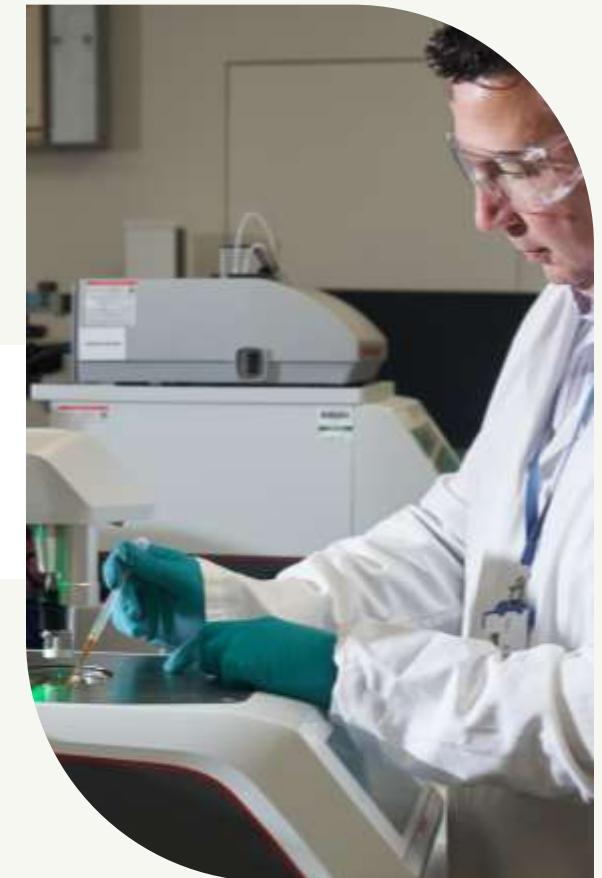
- **Conduct** all research and innovation in compliance with Unilever's global standards for safety, sustainability, and ethical responsibility.
- **Ensure** risks related to consumer safety, occupational safety, and environmental safety are assessed by expert assessors and managed.
- **Ensure** specifications for raw materials, products, and packaging comply with relevant regulatory requirements and standards.
- **Ensure** research involving human subjects is conducted to the highest ethical standards.

- **Support** Unilever's commitment to eliminating animal testing, ensuring that any mandatory regulatory testing is approved in advance.
- **Seek** approval for presentations and publications in advance.
- **Maintain** complete and accessible records of all research, including data, study protocols, and related decisions.



Where do I go for more information?

- Global Policy Portal



Product Safety and Quality

We design, make, and sell products based on sound science, technology, and responsible innovation, applying rigorous standards of safety and superior quality for consumers and customers.

Why it's important

Unilever prioritises the safety and quality of its products, adhering to all standards and regulations. This commitment builds consumer trust and strengthens our brands.

What must I do?

- **Apply** and uphold quality management standards (QMS) and systems to design, deliver, monitor, measure, and continually improve product and process performance to ensure compliance with internal and external requirements.
- **Act** on risks, issues and feedback from consumers, customers and partners. Including taking proactive steps to prevent quality or safety issues and escalating or recalling products that do not meet standards or regulations.
- **Foster** a quality-first culture by promoting transparency, accountability, and timely reporting of concerns to my line manager or Quality lead.
- **Communicate** responsibly and share accurate information about product safety, follow escalation procedures, and seek authorisation before responding to external queries.



Where do I go for more information?

- Local or Global Quality team
- QMS portal and chatbot
- Quality Business School



Avoiding Conflicts of Interest

We avoid conflicts of interest and immediately disclose when our personal interests or external commitments could conflict with Unilever's.

Why it's important

Conflicts of interest arise when an employee allows their actual, perceived, or potential personal, financial, or non-financial interests to affect their objectivity when performing their job at Unilever. They can have a significant negative impact on the reputation and effectiveness of Unilever, its business, and its people.

What must I do?

- **Report** any actual, perceived, or potential conflicts of interest to Business Integrity, including when I:
 - Hire, manage, or can influence the workload, assessment, approvals, or rewards of someone with whom I have a close personal relationship.
 - Accept or perform a public official role, or have family or a close contact who is a public official, who can take decisions that could impact Unilever's business.
 - Have a close personal interest in the business of competitors or third parties relevant to Unilever, such as a significant investment or working on products which compete with Unilever.
 - Seek to take on a second job or any other external commitment that takes time from my responsibilities to Unilever or conflicts with Unilever's interests.
 - **Ensure** Business Integrity has cleared my conflict of interest before starting or continuing with the conflicting activity.

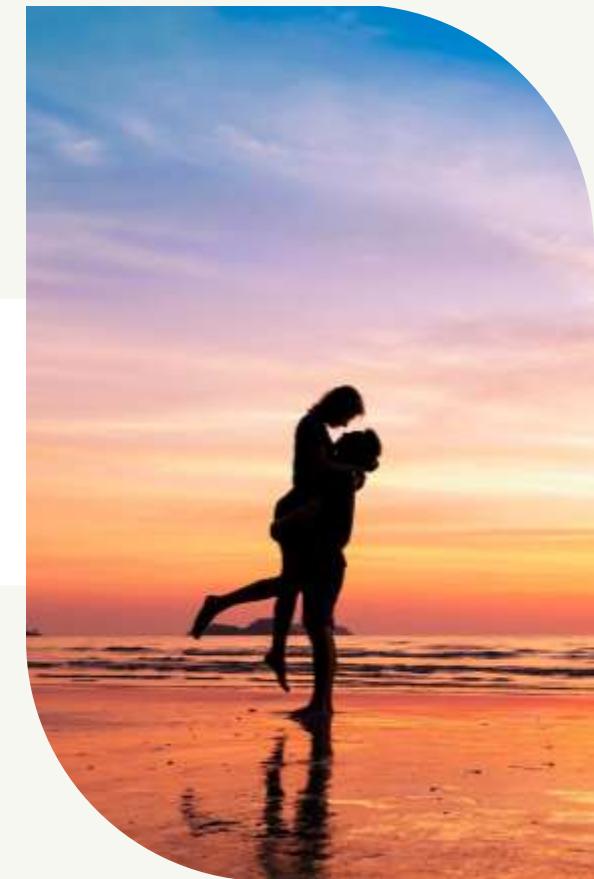
- **Do not** share commercially sensitive information about current or potential Unilever competitors.

- **Follow** the Conflicts of Interest Standard on conflicts, which includes rules on hiring former public officials, and taking personal directorships of other organisations.

Where do I go for more information?



- Business Integrity
- Global Policy Portal
- Conflicts of Interest Disclosure App



Anti-Bribery and Gifts & Hospitality

We do not give, accept, or request bribes of any type, including gifts, hospitality, donations, or sponsorships that are intended to inappropriately influence decisions or that are outside policy limits.

Why it's important

Bribery and corruption are not only illegal, but also damage Unilever's reputation, undermine trust, and may result in severe consequences including fines, imprisonment, and loss of business. Acting with integrity in all interactions helps protect both you and Unilever.

What must I do?

Anti-Corruption and Bribery:

- **Do not** offer or give bribes or improper advantages, including facilitation payments, to any public official or other individual or third party, which are, or give the impression that they are intended to influence decisions about Unilever. An exception applies if my freedom or physical safety is in danger.
- **Do not** request or accept bribes or improper advantages from any third party that could influence the way Unilever makes decisions.
- **Follow** all Unilever third party and finance processes such as those for onboarding suppliers, raising purchase orders, and offering/ receiving special trade terms, discounts, or rebates.
- **Report** any suspected or actual breaches as set out in the Living the Code Policy.

Gifts and Hospitality:

- **Ensure** all gifts and hospitality are legitimate, proportionate, occasional, and within limits, whilst avoiding cash or equivalents like gift cards, loans, shares, and overnight stays, or foreign travel.
- **Report** any gifts and hospitality which are above limits or to public officials. Further rules and details are set out in the Gifts and Hospitality Standard.
- **Decline** any gift or hospitality which is outside of the limits set in the Gifts and Hospitality Standard unless an exception has been approved through the disclosure tool.



Where do I go for more information?
• Business Integrity
• Global Policy Portal
• Gifts & Hospitality Disclosure App



Political Activities and Donations

We do not support political parties or make political donations, unless in our own personal capacity.

Why it's important

Unilever interacts with government as part of its business operations. Any political association could create a perception of a conflict of interest or damage our business.

What must I do?

- **Do not** make political donations or offer support in Unilever's name. If I support political groups personally, I make sure it is clearly not connected to Unilever and does not affect my work.
- **Disclose** any personal political roles or connections which may conflict with Unilever's interests in line with the Avoiding Conflicts of Interest Code Policy.
- **Seek** approval through the External Communications Standard before representing Unilever in any economic, industry, or social advisory groups that are set up by governments.



Where do I go for more information?

- External Communications Standard
- Global Policy Portal



Accurate Records, Reporting and Accounting

We ensure our accounts and reporting is accurate. We do not tolerate fraud or tax evasion. We ensure all transactions are based on valid documentation.

Why it's important

Accurate financial records and business information are essential for good decision-making, meeting legal and regulatory obligations, and maintaining stakeholder trust. Inaccurate or misleading records could constitute fraud, resulting in legal or financial penalties for employees or for Unilever.

What must I do?

- **Do not** make financial commitments or start work before there is an approved purchase order.
- **Do not** split purchase orders.
- **Never** receipt purchase orders unless the goods or services have been delivered.
- **Always** review the details of a purchase order and travel and expenses before submitting or approving it.
- **Ensure** that financial budgets are being monitored and reviewed. This includes trade discounts and rebates.
- **Record** all transactions accurately, completely, and on time.
- **Only** conduct business activities I am approved to carry out and ensure such activities are legitimate and supported by proper documentation.

- **Ensure** transactions I approve are within the limits set out in the Global Schedule of Authorities, are legitimate, and based on valid documentation.
- **Inform** Business Integrity and Head of Finance of any suspected fraud, tax evasion, or accounting issues; any red flags raised by the behaviour of a business partner or other third party, as well as any requests for facilitation payments.
- **Retain** business records in line with legal and policy requirements, or as instructed, including for audits, litigation, or regulatory investigations.
- **Cooperate** fully and honestly with internal / external auditors, tax authorities, and other regulators.
- **Never** conceal, alter, or falsify any company records or documentation.
- **Never** artificially inflate or shift sales or profits between accounting periods.

What must Finance professionals do?

- **Proactively** comply with accounting, auditing, tax, and environmental procedures, processes, standards, and laws.
- **Follow** all applicable external reporting standards and regulations and the internal accounting policy manual, carefully documenting the assumptions that underpin accounting records.
- **Ensure** there are no hidden or unrecorded accounts, funds, or assets.



Where do I go for more information?

- Local Purchase Order Helpdesk
- Unilever's Financial policies and Standards
- Business Integrity, Legal team or Finance team

Protecting Unilever's Assets

We protect Unilever's assets, guarding them from fraud and theft and only approving activities within our personal limits. We safeguard Unilever intellectual property by ensuring Unilever brands and innovations are protected. We respect valid third-party intellectual property rights by obtaining the relevant licences and approvals.

Why it's important

Misuse, theft, or damage to assets can lead to operational disruptions, legal issues, and reputational harm. **Protecting Unilever's assets ensures the continuity of our operations, maintains our financial stability, preserves innovation, and protects our competitive advantage.**

What must I do?

All assets:

- **Handle** Unilever's physical assets – for example factory equipment, products, buildings, computers, and vehicles – with care, to avoid damage, misuse, or loss.
- **Protect** Unilever's physical assets and report theft or loss to site SHE Managers.
- **Do not** remove company assets from any site unless authorised, nor use them inappropriately.
- **Identify** and manage potential hazards to assets on site, reducing risks to an acceptable level.
- **Guard** Unilever's financial assets – such as cash, bank accounts, and credit cards – against misuse, loss, fraud, or theft, and immediately escalate any red flags to my line manager.

- **Approve** financial transactions only within my limits as defined by my role and in compliance with the Global Schedule of Authorities.

- **Address** cyber security risks by embedding Cyber Security Standards and controls. This applies particularly if implementing or purchasing technology solutions

Intellectual property (IP):

- **Report** suspected counterfeit products or potential IP infringements – such as those related to trademarks, patents, designs, copyrights, and domain names – to the Business Group or IP Counsel.
- **Ensure** checks and filings are completed for patents, trademarks, designs, copyright, and other IP rights when launching new innovations, brands, sub-brands, products, services, or other materials.

- **Use** contracts with appropriate clauses to protect Unilever's IP when working with third parties.

- **Do not** use valid third-party IP without the appropriate licenses for example music, video, technology, trade marks, patents, fonts, software, etc. If unsure what is valid, I speak to my Legal Business Partner.

- **Do not** train non-Unilever approved third party GenAI or any other third party LLM with Unilever intellectual property or confidential information, including trade secrets, designs, patents, and trademarks.



Where do I go for more information?

- Local SHE Manager or Legal Business Partner
- Cyber Security Standards
- Intellectual Property Standards

Anti-Money Laundering and Economic Sanctions

We do not engage in money laundering and do not do business with any person or company subject to economic sanctions. We conduct business in compliance with all relevant trade controls.

Why it's important

Even seemingly innocent involvement in the proceeds of criminal activity can result in serious legal consequences, including being charged with the criminal offence of money laundering. Carefully obeying laws on economic sanctions and anti-money laundering therefore both protects Unilever's reputation and helps avoid personal criminal liability.

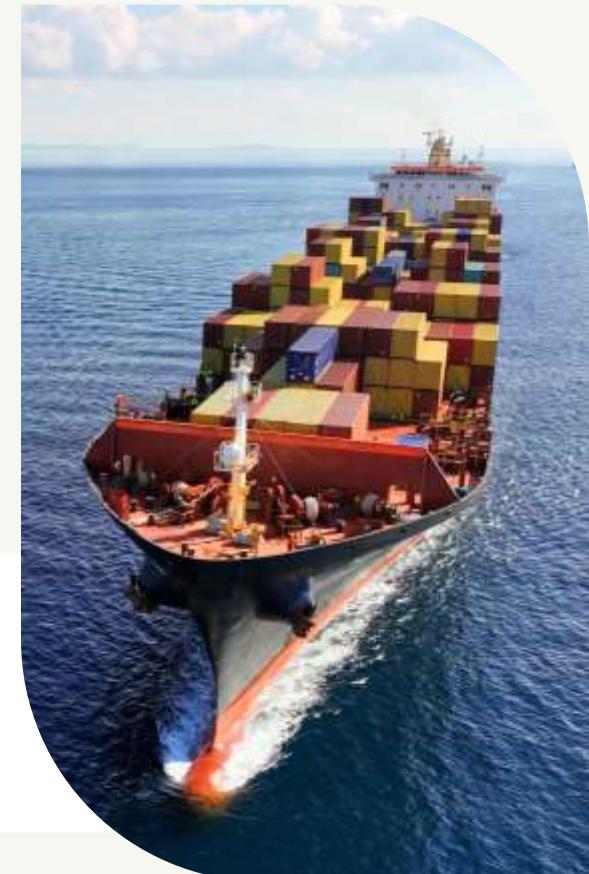
What must I do?

- **Do not** transact with any party that is subject to relevant economic sanctions as set out in the Economic Sanctions Standard. To support me in doing this, I follow official third-party processes for onboarding.
- **Notify** my Business Group and Country General Counsel immediately if I suspect money laundering activity or transactions with sanctioned countries or third parties.
- **Obtain** prior clearance from my Business Group and Country General Counsel, alongside a senior Finance manager, before proceeding with any transaction outside normal business terms such as payments to accounts that do not match the name or country of the Business Partner; those made in cash or overpaid; and those split across several bank accounts.
- **Ensure** third-party screening is conducted and any issues are remediated in full before contracts are signed and transactions occur; do not assume this has been done.
- **Do not inform** any third-party suspected of money laundering that they are under investigation.
- **Seek** guidance from Business Integrity when screening outcomes are unclear or where extra scrutiny is needed.
- **Disclose** to Business Integrity if I need to recuse myself from an economic sanctions perspective, for example if I am a US citizen.

Where do I go for more information?



- General Counsel for Economic Crime and Sanctions
- Global Policy Portal
- Disclosure Tool



Health and Safety (1/2)

We comply with legal and Unilever health and safety standards to ensure a healthy and safe workplace, aiming for continuous improvement.

Why it's important

Unsafe and unhealthy practices can lead to illness, injury, environmental harm, or loss of life. A proactive health and safety culture ensures the protection of people, property, the community, and the environment. Every individual contributes to creating a safe and supportive workplace.

What must I do?

- **Work** and behave in a safe and health-conscious manner, following all laws, regulations, policy, standards, procedures, instructions, and training relevant to my role.
- **Never** carry weapons on site.
- **Perform** work only when I am trained, competent, medically fit, sufficiently rested, functionally capable, and alert enough to do so.
- **Know** what to do in an emergency at my location, during visits to other sites, or when travelling.
- **Report** all actual or near miss incidents, unsafe conditions, injuries, illness, or unhealthy conditions to local Unilever management, without delay. Never assume someone else will.

- **Support** team leaders to ensure all employees, contractors, and visitors understand and follow health and safety procedures, and instructions.
- **Never** breach the Life Critical Standards.
- **Never** work under the influence of any substance that may negatively impact the health and safety of myself or others.
- **Never** carry on with any work that becomes unsafe or unhealthy.
- **Speak Up** if I have concerns about my ability to meet these minimum requirements or if the environment is unsafe or unhealthy.



Health and Safety (2/2)

As a team leader, what do I need to do?

- **Establish** and maintain a suitable health and safety management system for my site and team, including the appointment of committees, managers, competent experts, and a system for gathering concerns and input from employees, contractors, and visitors.
- **Identify** and manage health and safety hazards and risks related to all team and site operations, activities, emergencies, and services.
- **Review** compliance regularly with local health and safety legislation, as well as relevant Unilever standards.
- **Set** site and role-specific improvement objectives and monitor performance, including an annual review of the management systems' effectiveness and adequacy.
- **Report** mandatory Key Performance Indicators (KPIs) through Unilever's health and safety reporting system.

- **Investigate** and report all incidents, accidents, and near-misses in line with reporting requirements, including follow-up and the communication of lessons learned.
- **Maintain**, communicate, and test both site and role emergency plans.
- **Ensure** all employees, contractors, and visitors receive applicable emergency notifications, procedures and role-specific health and safety information, and training in the local language.
- **Never** discourage an individual from reporting a risk, concern, or incident, or ask them to start or continue work in an unsafe or unhealthy environment



Where do I go for more information?

- Health and Safety Manager
- Site's Health and Safety management system
- Global Health and Safety Standards (for Life Critical Standards)



Respect, Dignity and Fair Treatment (1/2)

Human Rights: We respect human rights and are committed to treat all employees with fairness and respect. We seek to create an environment that enables diversity, inclusion, equal opportunity, freedom of association, and collective bargaining. Unilever provides employees a living wage. We have zero tolerance for forced labour, including any form of compulsory, trafficked, or child labour.

Why it's important

Unilever believes that business can only thrive in societies where human rights are respected and promoted. We ensure our employees work in an environment that is inclusive, free from discrimination, and based on mutual trust.

What must I do?

- **Respect** the dignity and human rights of everyone at work.
- **Treat** everyone fairly and equally, without discrimination, on the basis of protected characteristics (race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views, or any other class protected by law).
- **Avoid** and challenge any behaviour that could be offensive, intimidating, malicious, violent, insulting, or bullying of any kind. This includes zero-tolerance on sexual harassment, including inappropriate jokes, lewd comments, sexual images, or community exclusion.
- **Promote** a culture where employees are treated with dignity, and concerns can be raised and addressed promptly and fairly, and without retaliation.

Discrimination and Harassment: We have zero tolerance for sexual harassment. We do not tolerate discrimination (based on protected characteristics) harassment, bullying, or offensive behaviour, either directly or indirectly. We provide a transparent, confidential, and fair way for employees to raise concerns or report unfair or discriminatory treatment and do not tolerate any retaliation for speaking up.



Respect, Dignity and Fair Treatment (2/2)



As a line manager, what must I do?

- **Ensure** all work is based on freely agreed and documented terms that employees understand and which are available throughout their employment.
- **Ensure** that no one has paid recruitment fees or related costs to gain employment, either directly or indirectly, and arrange repayment of any fees that are found to be paid.
- **Provide** fair and equitable wages that meet or exceed the higher of the legal or industry standards, including any terms set by collective bargaining agreements and that allow the employee to afford a decent standard of living.

- **Provide** a pay slip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, specifying regular and overtime hours worked (where workers are paid on an hourly basis), and benefits, incentives / bonuses, and any agreed deductions. Other than legally mandated deductions, all other deductions require written consent of the employee.
- **Maintain** working hours to the lesser of local legal limits or 60 hours per week inclusive of regular and overtime hours, with all overtime being voluntary. See the Health and Safety Code Policy for additional requirements.
- **Base** all decisions related to employment – such as recruitment, reward, benefits, promotion, redundancy, and training – on merit.
- **Respect employees' rights to form or join legally recognised unions or other representative bodies, and engage in constructive dialogue and bargain in good faith on matters that affect them.**

- **Follow** local legal requirements for casual, short-term, or agency employees.
- **Carry** out appropriate identification checks during the recruitment process to ensure there is no child labour – defined as anyone under the age of 15, or the minimum legal working or mandatory schooling age, whichever is higher.
- **Ensure** that young workers below the age of 18 only perform work that is not mentally, physically, socially, or morally dangerous, or which deprives them of the opportunity to attend school.



Where do I go for more information?

- Local HR
- Global Policy Portal

Protecting Technology and Information (1/2)

We ensure all of Unilever's digital assets are safe, used for work purposes, not used for inappropriate activities, and are properly maintained. We protect all forms of Unilever information by classifying, storing, securing, sharing, updating, and deleting it in line with our standards and relevant laws including privacy and security.

Why it's important

Unilever provides access to its technology and information so employees and approved partners can perform their roles effectively. Misuse or careless use can impact system performance, breach legal obligations, and compromise cyber security. Proper classification, handling, and protection of information is critical to maintaining trust, ensuring business continuity, meeting legal and regulatory requirements, and protecting individuals' rights.

What must I do?

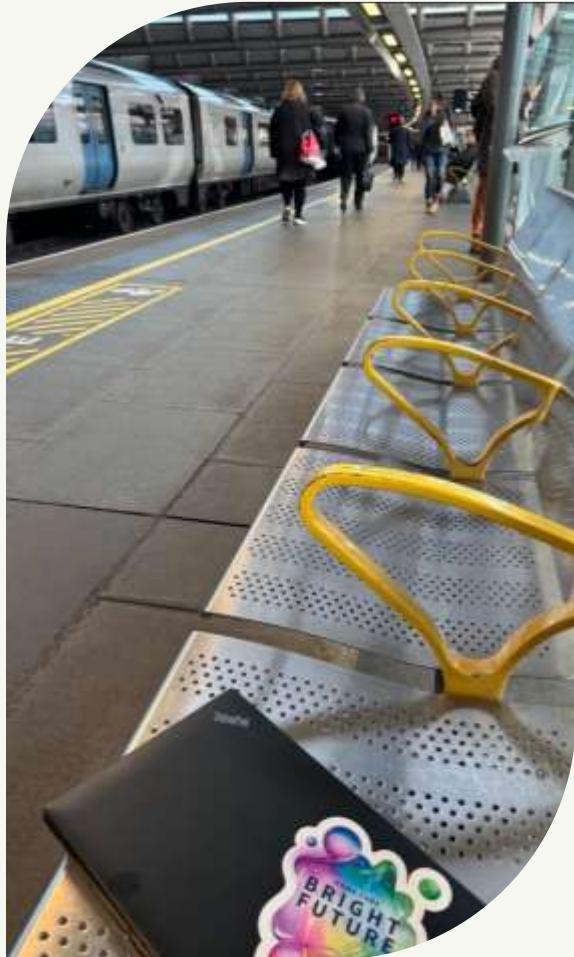
Information:

- **Classify** your information in line with the Information Classification Standard: Public, Internal, Confidential, or Restricted.
- **Follow** the requirements outlined in the Information Handling Standard which sets out what types of information can be shared with whom. Take personal responsibility for how information is used, shared, stored, protected, and disposed of.
- **Share** Unilever information only on a need-to-know basis with individuals and authorised third parties for legitimate business purposes or as required by law.
- **Do not** forward Unilever information to personal email or storage accounts, sync Unilever data on devices not managed by Unilever, or use removable media such as USB storage.

- **Do not** share any non-public (e.g. confidential) Unilever information on unapproved technology, collaboration, and messaging tools.
- **Understand** that in accordance with our values, applicable laws, and our respect for privacy as a human right, all information processed by or stored on Unilever issued or owned systems and equipment (and Unilever information on personal devices) may be monitored, inspected, or removed by Unilever without prior notification. Unilever may log, diagnose, investigate, and assess activity and data on Unilever systems to ensure this policy is being followed and Unilever's technical environment is optimised and risk managed.



Protecting Technology and Information (2/2)



Equipment and technology:

- **Use** only Unilever-approved technology to share and manage information and take additional care when working in public places.
- **Install** only approved applications and use only approved services including software as a service and artificial intelligence.
- **Ensure** work equipment is used appropriately and kept protected from damage, theft, or loss.
- **Secure** equipment and documents when not in use. Lock any device with a password or PIN when unattended, irrespective of location.
- **Do not** share Unilever access credentials with anyone, use Unilever passwords anywhere else, or use Unilever identities for non-business-related activity.
- **Ensure** personal use of Unilever technology does not materially impact performance such as excessive storage or data usage.

- **Report** any suspected cyber issues or suspicious activity by raising a security incident such as unauthorised information sharing or unexpected authentication notifications.

- **Report** lost or stolen devices (Unilever or personal) used to access Unilever information immediately as a security incident.

Malicious activity:

- **Do not** intentionally access Unilever technology or Unilever information that is not intended for my role, or after leaving Unilever employment.
- **Do not** disable, bypass, or interfere with security controls, for example browser configuration, anti-virus, privileged access, firewalls, or system logs.
- **Do not** use systems for any illegal activities, or that could cause serious or widespread offence or are associated with violence, terrorism, pornography, or insulting content.

If I own, procure, or run technology, or manage a third party, what do I need to do?

- **Address** cyber security risks through the correct application of the Cyber Security Standards, by taking accountability to follow the cyber processes detailed on the Cyber Security Zone.

Where do I go for more information?



- Business Information Security Officer
- Cyber Security Standards
- Cyber Security Zone (including to report a Cyber Incident)

Personal Data and Privacy

We ensure all of Unilever's digital assets are safe, used for work purposes, not used for inappropriate activities, and are properly maintained. We protect all forms of Unilever information by classifying, storing, securing, sharing, updating, and deleting it in line with our standards and relevant laws including privacy and security.

Why it's important

Protecting personal data is fundamental to respecting the human right to privacy. It builds trust with employees, consumers, and partners. Improper handling of data or AI usage can result in discrimination, data breaches, reputational damage, and legal consequences.

What must I do?

- **Collect** only proportionate and necessary personal data required for the intended purpose.
- **Ensure** transparency with individuals about how their data is used and ensure it is in line with Unilever's privacy notices.
- **Make** sure that personal data is collected for explicit and legitimate purposes in accordance with local law such as with individual consent.
- **Keep** personal data secure, confidential, accurate, and up to date, and correct it when requested.
- **Delete** personal data when it is no longer needed for the intended purpose or as required by law.
- **Consider** potential harm to individuals when using their data and take steps to mitigate these risks.
- **Review** AI outputs to ensure they are accurate, reliable, and fair, prioritising privacy, and security.
- **Do not** put Unilever's confidential or personal data into publicly available AI tools.



Where do I go for more information?

- Local Data Protection Advisor or Global Privacy team
- Privacy Standards



Preventing Insider Trading

We do not trade or encourage others to trade securities, like shares, when in possession of inside information.

Why it's important

Using inside information to trade, or sharing it improperly, is a criminal offence in many countries, leading to fines, imprisonment, and reputational harm. For a publicly-listed company such as Unilever, inside information is non-public information, which is of a precise nature and which would be likely to have a significant effect on the company's share price if it were to be made public. If you have access to inside information in respect of Unilever, you will be added to an insider list and notified. If you are not sure whether information you have is inside information or not, then assume it is and / or check with the person you got the information from.

What must I do?

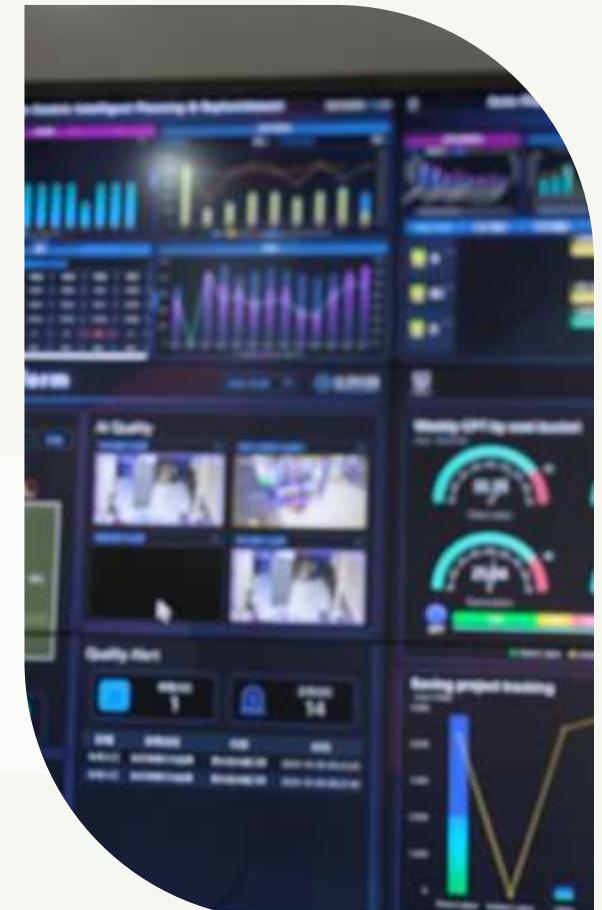
- **Do not** deal in Unilever securities (which includes shares, ADRs and related derivatives, and spread bets) for my own account or on anyone else's behalf, or recommend anyone else deal in such securities, while I am in possession of inside information.
- **Do not** share "inside information" (non-public information that would significantly affect Unilever's share price if made public) with anyone not authorised to have it, including other Unilever employees.
- **Refer** to the Share Dealing Standard and Disclosure Manual or contact the Corporate Secretaries' Department for more information.
- **Inform** a member of the Disclosure Committee immediately if I suspect or know inside information has been shared with anyone not authorised to have it or is being misused.

- **Refrain** from engaging in activities that involve manipulating the price of publicly listed companies or the spread of false information.
- **Use** Unilever's information only for legitimate business purposes or as required by law.
- **Report** any concerns about the use of Unilever restricted or inside information by any person, including business partners, to my line manager or Business Integrity.

Where do I go for more information?



- Unilever's Share Dealing Standard and Disclosure Manual
- Corporate Secretaries' Department or Legal Group
- Disclosure Committee members



Responsible Marketing

We sell products that are accurately labelled, advertised, and communicated. We conduct marketing activities and research in line with societal expectations.

Why it's important

Our marketing has the power to influence society, so it must be conducted thoughtfully and respectfully. Responsible marketing protects Unilever's reputation, builds consumer trust, ensures we comply with legal and ethical standards, and reflects our strategy and values.

What must I do if involved in marketing activities?

- **Follow** all applicable marketing laws.
- **Describe** Unilever's products and services truthfully, accurately, and transparently.
- **Provide** sufficient, clear, and honest information so that consumers can make informed decisions and use our products and services correctly. This means we must not use images, information, or technical language (including AI-generated content) that are misleading.
- **Ensure** all marketing claims are backed by adequate support.
- **Adhere** to Unilever's marketing principles and standards, especially when marketing to children, using AI synthetic people, or using social media.

- **Do not** create marketing plans that breach environmental laws or commitments.
- **Ensure** marketing activities show cultural, social, ethical, and religious sensitivity.
- **Do not** use themes, imagery, or media placements that could cause serious or widespread offence or are associated with violence, pornography, or insulting content.

Where do I go for more information?



- Line manager or Legal Business Partner
- Internal Marketing and Brand Guidelines



Fair Competition

We compete fairly and comply with all competition laws, always refusing to engage in any kind of anti-competitive practice.

Why it's important

Unilever is committed to competing and winning on a fair, competitive level-playing field. Violating competition laws can lead to very harmful consequences, including huge fines and civil damages, criminal sanctions for individuals, and damage to Unilever's reputation. Competing fairly also builds trust with our customers, suppliers, and partners.

What must I do?

- **Follow** competition laws for my market and category, making sure to understand and adhere to applicable laws and Competition Standards, including those on trade associations and European cross border sales.
- **Do not** discuss or agree with competitors on prices, terms of sale or purchase, costs, allocation of customers, suppliers, or territories, marketing claims, salaries, or other employee compensation elements, or any other competitive parameter that may be important to consumers or employees.
- **Share** or receive commercially sensitive information with or from competitors only within the limits of our Competition Standards or after consultation with Legal.

- **Partner** with the Legal function before engaging in cooperation initiatives with actual or potential competitors such as joint purchasing / negotiation, standardisation, cooperation on ESG parameters, R&D, production, commercialisation, etc.
- **Seek** advice from my Legal Business Partner before restricting a distributor's or customer's resale activities, particularly on decisions on resale prices, promotions, or territories.
- **Act** with particular caution when Unilever's market positions are strong, seeking advice from my Legal Business Partner if Unilever's commercial practices could be perceived as abusively excluding competitors, or as unfair to customers or suppliers.

- **Do not** seek to obtain or use information in a way that might violate legal or contractual non-disclosure obligations of third parties or new employees.

Senior managers must:

- **Ensure** that our Fair Competition Code Policy and Standards are understood by their teams, or any third party acting on Unilever's behalf.



Where do I go for more information?

- Legal Business Partner or the Competition team
- Competition Standards

External Engagements and Communications (1/2)

We are trained and approved before speaking to brokers, analysts, shareholders, media, government, NGOs, or regulators.

Why it's important

Communicating on social media or with external parties, including brokers, analysts, shareholders, media, government, NGOs, or regulators, carries risk. Mishandled communication can result in misinformation, legal risk, reputational damage, and regulatory consequences. Responsible and transparent engagement builds trust and protects Unilever's licence to operate and grow.

What must I do?

Any External Communication:

- **Ensure** the accuracy and truthfulness of all information shared.
- **Consider** Unilever's reputation when communicating externally, applying the rules set out in the Social Media Standard.
- **Seek** approval from the relevant teams before making contact on specific topics e.g. contact local Finance or Legal teams before discussing financial, legal, tax, or pensions matters; Regulatory Affairs before contacting regulators about products, ingredients, or compliance; local Communications, Corporate Affairs & Sustainability teams before contacting NGOs.

Engagement with government officials, regulators, or NGOs:

- **Only** engage with government officials, regulators, or NGOs if I am appropriately trained and authorised by my line manager.
- **Keep** a record of my contact and interactions with authorities.
- **Seek** prior approval through the process set out in the Engaging Externally Standard before making contact to represent Unilever's interests, and obtain ongoing clearance if contact is a regular part of my role.
- **Follow** site procedures for unannounced inspections and know who the designated responsible person is at my site.



External Engagements and Communications (2/2)



Brokers, analysts, shareholders, or the media:

- **Only** communicate with the media or investment communities if I have specific authorisation and training / briefing from Communications & Corporate Affairs, Investor Relations, or are a Board Member.
- **Comply** with any conditions or constraints related to my authorisation, including with whom, when, and how I may communicate.
- **Direct** any inquiries from investor communities or the media to Investor Relations or Communications & Corporate Affairs; never respond directly or share inside information. Wherever feasible, there must be a member of the Communications & Corporate Affairs team present for any media engagement.



Where do I go for more information?

- Communications, Corporate Affairs and Sustainability team or Product Safety & Regulatory Affairs teams
- Global Policy Portal

Responsible Sourcing and Business Partnering

We select and work only with partners who are able to uphold standards consistent with our own commitment.

Why it's important

Unilever expects its business partners to have their own codes and policies in place that are appropriate to their business and of a comparable standard to ours, and to pass similar requirements up their supply chain. Our Responsible Partner Policy (RPP) sets out the mandatory requirements that all third parties must meet. Failing to meet these standards may result in legal and reputational risks for Unilever and abuse of human rights of workers in our supply chain. All employees engaging with third parties play a vital role in ensuring compliance.

What must I do when contracting or working with third parties?

- **Read** and understand the RPP, which contains clear standards for suppliers, customers, and other third parties. The RPP is supported by tools, guidance, and processes for onboarding, monitoring, and addressing non-compliance. Mechanisms are available for employees to raise and seek resolution to concerns related to third-party conduct. The RPP is overseen through governance bodies.
- **Ensure** that all third parties are subject to the provided RPP controls for onboarding, contracting, and ongoing monitoring including risk-based auditing and remediation of issues.
- **Ensure** that third-party selection, shortlisting, and tendering processes consider their ability to meet the RPP requirements.

- **Include** contract clauses in agreements with suppliers, distributors, and other parties (such as MSAs, UPAs, CTCs, POs, DOs) to confirm that business partners acknowledge and agree they can meet the RPP requirements as a condition of engagement.

- **Do not** agree to contractual changes related to the RPP without first consulting my Legal Business Partner and obtaining written authorisation from the Responsible Business team.

- **Report** to my line manager, the Responsible Business team or Business Integrity if I am aware of, or suspect, non-compliance with the RPP, or any legal requirement by a third party.

- **Engage** with the Responsible Business team on how to support the remediation of issues before making a decision to disengage with a partner due to human rights non-compliances.

- **Discontinue** transacting with third parties, either directly or through another party, who have been identified as non-compliant with the RPP, unless a formal exemption, or dispensation has been granted by the Responsible Business team.

- **Respect** the rights of all individuals and communities who are defenders of human rights and civic freedoms.

- **Seek** guidance on both the legal requirements and human rights impacts of the transaction, when procuring, disposing of, or changing use of land. Unilever respects customary and legitimate land tenure rights and does not tolerate land grabbing.

Where do I go for more information?



- Responsible Business or Human Rights teams
- Responsible Partner Portal
- Human Rights Portal