Contact with Government, Regulators & Non-Governmental Organisations (NGOs) (1 of 2)

Any contact by employees or other representatives with government, legislators, regulators or NGOs must be done with honesty, integrity, openness and in compliance with local and international laws.

This Code Policy provides detailed guidance on how contact with the above authorities must proceed. It does not cover interactions about purely personal matters, such as personal charitable donations or personal tax.

Governments, regulators and legislators includes bodies that may be: global or international (e.g. United Nations); regional (e.g. European Union, ASEAN); national; or active at a local community level. Non-Governmental Organisations (NGOs) also operate at different levels, and their work includes social and consumer issues as well as environmental ones.

Interaction with these organisations must only be made by authorised and appropriately trained individuals. This covers all forms of communications, whether formal, informal or social interaction in relation to Unilever business including any kind of correspondence such as in-person, electronic media or written correspondence.
Contact with Government, Regulators & Non-Governmental Organisations (NGOs) (2 of 2)

Musts

Employees must:

- Be appropriately trained and authorised by their Line Manager
- Be courteous, open and transparent in declaring their name, company, role, status and, for any enquiry or ‘representation’, the nature of the subject matter
- Take all reasonable steps to ensure the truth and accuracy of their information
- Keep a record of contacts and interactions with authorities at our own initiative
- Seek prior approval when contacting officials to represent our legitimate interests as follows;
  - Global/international organisations = Global Head of Regulatory Affairs, Global Head of Communications & Corporate Affairs or Global Head of Sustainability;
  - Regional organisations = Global Head of Communications, Markets or relevant local External Affairs/Regulatory Affairs Head;
  - National or local organisations = National Head of External Affairs/Regulatory Affairs Head; If employees do not have such departments in their location, they must get approval from Head of Country or National Managing Director/Head of Operations.
- Where appropriate, obtain clearance on a standing basis as a requirement of their role, for example, employees from regulatory affairs, communications and advocacy
- Have prior approval from the local Finance Director, General Counsel or Corporate Tax Department, Group Controller or Corporate Pensions Department for any contact relating to taxation, financial reporting, accounting, pension or legal matters
- Have prior approval from Regulatory Affairs (which will in turn liaise with legal group) before any contact with regulators about Unilever’s actual or planned use of products and / or ingredients
- Have prior approval from the local communications department before any contact with NGO’s
- Be aware of the up to date procedures communicated by site leaders for responding to unannounced inspections from relevant authorities. This must include the nomination of Responsible Persons to lead the response for each type of potential inspection.

Must nots

Employees must not:

- Attempt to obstruct the collection of information, data, testimony or records by authorised investigators or officials
- Say or do anything that may, or may be perceived as seeking to, improperly influence decisions about Unilever by any government, legislators, regulators or NGOs (see the Code Policies on Gifts & Hospitality and Anti-Bribery)