

# Strengthening human rights due diligence in our value chain

Our procurement human rights strategy focuses on fostering a supply chain ecosystem where our suppliers are champions of human rights and decent work, and where workers are empowered to exercise their rights freely. Our supplier human rights due diligence (HRDD) development programme is a collaborative project that aims to support suppliers in strengthening their policies, processes and approaches. This programme provides tools that help suppliers identify areas for improvement, as well as access to training resources that expand their capability to identify and respond to potential and actual human rights impacts.

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## Laying the foundations

The first step of the programme helps participating sites to evaluate the maturity of their HRDD approach; identify common improvement areas; and gain insights from workers about their experiences at work. We partnered with [60 decibels](#) and [Wider](#) (both established rightsholder engagement consultants) to gather baseline data from workers - which will help us track the quality of jobs offered by participating suppliers - and evaluate the positive impact that the programme has for workers. The survey is designed so that we can analyse results using segmentation by gender, ethnicity, contract type and role seniority, as well as by supplier location, business size and sector.

The programme is being rolled out in phases to ensure effective implementation and engagement:

- Group 1: Launched in August 2024 with 26 suppliers across Brazil, Mexico, India, Thailand, and Indonesia.
- Group 2 (India): Kicked off in November 2024 with 5 tea suppliers.
- Group 2 (Global): Expanded in Q1 2025 with 54 additional suppliers from the five original countries, plus the Philippines and Turkey.

This phased approach allows us to pilot the approach, build learnings from each stage, and scale responsibly across markets.

We have trialled different survey methods in parallel:

- Talking phone surveys
  - We piloted this approach with 928 workers (5% women) working for 5 suppliers in India. A sample of workers was randomly selected from a list of phone numbers provided by our suppliers, and the survey was conducted verbally over the phone by trained enumerators.
- Opt-in SMS surveys
  - Unilever conducted opt-in SMS surveys with 4,111 workers (41% women and 26% migrant workers) at 19 supplier sites across Indonesia, Thailand, Mexico and Brazil. Participating supplier managers shared instructions for accessing the survey with workers via posters, notice boards, meetings, word of mouth,

and emails. Workers could then choose to participate by scanning a QR code and selecting their preferred platform for completing the survey, from a choice of WhatsApp, Jotform (online surveys) or automated phone calls. Workers who completed the survey received entry into a lucky draw to win mobile credit.

- **In-Person surveys**
  - In-person surveys were conducted with 1,060 workers (53% women) across 5 tea estates in Assam, India. This survey method was chosen due to the low literacy levels and phone penetration among workers at the tea estates. Trained enumerators visited the estates and conducted interviews in the local language, ensuring that workers felt comfortable and understood throughout the process.

We will repeat the worker survey throughout the programme to track the impact on job quality. This will allow us to continually adapt the programme based on workers' needs and insights.

### **Worker-led monitoring provides key insights**

The data gathered from workers through the survey tools has enabled us to gain new insights into their experiences in the workplace. Our programme partners analysed the data and identified several prevalent issues including:

- **Recruitment fees:** Workers in multiple regions shared that employers are not reimbursing the costs they incurred to secure their jobs.
- **Inappropriate behaviour:** Some sites need to make improvements to address issues like workers being shouted at or receiving unwanted attention. While physical punishment or harassment was rarely reported, it was more common among migrant workers, younger employees and women.
- **Health impacts:** Workers in certain areas reported that their jobs negatively affect their health.
- **Safety at work:** A notable portion of workers expressed feeling unsafe in their workplace environments.
- **Discrimination:** Workers reported being treated differently based on gender or ethnicity, with women more frequently experiencing sexual harassment.

Another common theme reported by workers in most of the countries relates to low levels of confidence in formal complaints systems. Survey responses indicated that some workers have low awareness of these channels or feel discouraged from using grievance mechanisms due to concerns about retaliation.

Whilst the worker survey responses highlight many areas of improvement, there are also indicators that highlight the positive impact of employment created by suppliers in our value chains. Many workers indicated that working for our suppliers provides decent job security.

We are working with suppliers to validate these survey responses and once verified, they are combined with the results of the supplier maturity assessment to inform and determine site-level action plans.

## Assessing supplier maturity

Alongside the worker surveys, participating suppliers in the programme complete a human rights due-diligence (HRDD) maturity assessment that evaluates their approach to:

- Managing effective grievance mechanisms
- Training & development
- Carrying out risk assessments for workers on-site as well as for their supply chains
- Taking action on specific issues such as forced labour, child labour, harassment, living wages, and - where relevant - land rights and freedom of association

Our implementation partner works with each supplier to complete the assessment by carrying out an interview with managers at each site, validating answers and probing where additional information is needed. This information is complemented by data from SMETA audit reports and the Unilever Supplier Qualification System. Each site is scored on a maturity scale: Not Initiated, Launched, Established, Leadership Level.

This process has helped suppliers identify issues that are not typically identified during in-person on-site compliance audits, including those relating to gender-based violence, discrimination and fear of retaliation. Key HRDD maturity gaps include:

- **India**
  - Robust HRDD carried out on supply chains
  - Gender diversity in management
  - Independent grievance mechanisms
- **Brazil**
  - Sufficient policy coverage on key topics such as prevention of forced labour, harassment, and child labour
  - Grievance mechanisms meeting UNGPs effectiveness criteria
  - Robust measures to prevent harassment
- **Mexico**
  - Sufficient protocols to manage grievance systems
  - Adequate training and topic-specific policies covering prevention of forced labour, harassment, child labour
  - Robust HRDD carried out on supply chains
- **Indonesia**
  - Effective measures to control risks of forced labour and child labour
  - Adequate processes to manage cases of harassment
  - HRDD management systems including effective grievance mechanisms
- **Thailand**
  - Robust due diligence of agencies to effectively implement Employer Pays Principle
  - Adequate grievance mechanisms that meet UNGPs criteria
  - Inclusive training and onboarding processes

## **Taking action to address issues**

The baseline assessment is done at site level, and each site will receive their own results. Drawing upon these findings, the site will develop an action plan to address gaps in their HRDD, with consideration given to the views and experiences shared via the worker engagement surveys.

A critical success factor for this programme is improving awareness of rights. Both managers and workers receive training, carried out both in person and using digital platforms. Training topics include:

- Workplace Safety
- Respect and Inclusion
- Grievance Reporting
- Prevention of Harassment and Discrimination

## **Next steps**

We are working with implementation partners to support business partners to address these findings, including through capability building. Business partners are expected to engage in this process and demonstrate progress against their action plans. Where business partners are unwilling to engage or take steps to address human rights impacts, we continue to use our leverage to engage constructively, reserving disengagement as a last resort.

We will scale delivery by leveraging learnings to deepen impact in current countries and categories, while expanding to new geographies in 2026, including Bangladesh and Pakistan, through a supplier-led cascade model that drives ownership across tiers. At the same time, we will continue to work with business partners in the programme to address the most salient risks identified during their baseline assessment and monitor progress to ensure continuous improvement.