

Unilever Human Rights Case Study

Supporting business partners to strengthen their policies and practices

Our global value chain connects us with millions of people, and we believe every individual should be treated with dignity and fairness. Respect for human rights is at the core of our company values. To uphold this commitment, we continue to apply a risk-based approach to human rights due diligence (HRDD), aligned with the United Nations Guiding Principles on Business and Human Rights.

Part of our HRDD approach includes carrying out risk assessments of business partners who provide us with products and services. Our Responsible Sourcing Programme supports these partners in meeting the essential criteria for doing business with us, as outlined in our Responsible Partner Policy (RPP). The programme also helps suppliers take action on issues identified during third-party site audits, including those that could potentially result in harm to workers, and to remediate actual impacts. Examples of audit findings and the corrective actions taken by business partners with our support are found below.

Case Study: Passport retention and payment of recruitment fees – Malaysia

In 2024, a business partner supplying our Ice Cream Business Group underwent an ethical audit. The results identified several non-compliances related to our Responsible Partner Policy on freely agreed terms of employment. These included the retention of workers' passports and evidence of recruitment fees paid by workers.

We immediately engaged with the supplier to better understand the issues and discovered that they had been assessed by the same audit firm for six consecutive cycles, with the last three conducted by the same individual auditor. The findings appeared consistent across cycles, which highlighted the need to look beyond surface-level compliance and address the underlying root causes.

Our Responsible Business team worked with the supplier to create an effective corrective action plan (CAP), addressing the findings and embedding improved systems and processes for managing recruitment of migrant workers. Passports were returned to the migrant workers, and secure safety deposit boxes were provided for each individual to store their identification documents. The supplier revised their policies to uphold the Employer Pays Principle and updated sub-contractor agreements. In addition, all recruitment-related costs were reimbursed to workers. A follow up audit has been scheduled to verify that these issues have now been satisfactorily resolved.

Case Study: Safeguarding workers' health and safety – Pakistan

During an on-site audit in January 2025 at a business partner's packaging material factory in Pakistan, the absence of a centralised fire alarm and smoke detectors across the production facility was identified. In response, our Responsible Business and Supplier Operations teams

engaged with the business partner to investigate the root causes and co-develop a CAP to remediate the findings.

Over the following six months, we supported the implementation of new safety protocols, including regular evacuation drills and the installation of a temporary manual alarm system, ensuring immediate risk mitigation while a permanent automated system was being installed.

These improvements are estimated to have cost our business partner over EUR 1 million. This investment not only ensures the safety of the 260 workers onsite, but also brings the factory in line with legislative requirements, strengthening its long-term operational resilience.

Case Study: Safeguarding workers' health and safety at a raw material supplier factory – Bangladesh

In January 2025, a third-party audit was conducted at a raw material supplier in Bangladesh that provides inorganic chemicals to multiple business groups. The audit identified several health and safety non-compliances.

The facility includes an eight-story dormitory housing approximately 250 employees, including both management and workers. Auditors found that a legally required secondary staircase had not been installed, posing a serious evacuation risk in emergencies such as fire or structural failure. In addition, the existing staircase had open gaps on every floor without safety barriers, creating a serious fall hazard.

In response, the Responsible Business team engaged with this business partner to create a CAP, addressing the findings to improve health and safety processes on site. A compliant secondary staircase was installed meeting both legislative requirements as well as our Responsible Partner Policy. Most importantly, the improvements ensured the safety of all 250 workers on site.

Case Study: Recruitment Fees, social security and fire incident - Philippines

In January 2024, a third-party audit of a business partner in the Philippines identified several non-compliances, including issues related to recruitment fees and fire safety.

One of the recruitment agencies used by this business partner provided uniforms, ID cards, cash cards and annual physical exams to employees. The agency's policy stated that if an employee left before completing one year of service, the cost of these items would be deducted from their final wages. However, the audit revealed that deductions were also made, without written consent, from the Workers Investment and Savings Programme which is prohibited under local law.

The Responsible Business and Supplier Operations team engaged with the business partner to create an effective CAP after doing appropriate root cause analysis. The business partner agreed to revise the policy and update their sub-contractors' agreements as well as reimbursing recruitment fees borne by workers. The supplier has subsequently completed repayments to reimburse all workers.

During the same audit in 2024, several fire safety violations were also identified, including missing fire safety clearance for stored fuel and insufficient fire preparedness. Steps were taken to improve health and safety processes but sadly, in April 2025, a fire broke out at the warehouse. As a result, the supplier is undergoing investigation and we continue to work with them to remediate the issues to prevent future incidents.

Case Study: Workers paying fees to temporary agency - North America

In January 2025, a third-party audit was conducted at a collaborative manufacturing business partner based in North America that supplies dry soup and seasoning mixes to Unilever. The audit revealed that a temporary agency engaged by the business partner was charging workers fees, including application costs and drug test expenses.

In response, the business partner was required to submit an immediate action plan to address the issue and reimburse affected workers. The Responsible Business team supported the development of an effective CAP, ensuring that all active employees linked to the findings received prompt reimbursement. The agency also committed to cease charging any future recruitment fees.

To prevent reoccurrence, the business partner strengthened its due diligence processes for labour agencies. This included service level agreements focused on ethical recruitment and document checks to monitor ongoing compliance.

A follow up audit in April 2025 confirmed that these issues had been fully remediated. The business partner has since committed to conducting internal biannual audits of its agencies to ensure continued compliance.

We have a number of resources available for business partners to use, including our [Responsible Partner Policy Implementation Guidance](#). For more information about our Responsible Sourcing Programme, please visit [Becoming a Unilever Supplier | Unilever](#).