

Unilever's approach to Human Rights Due Diligence

June 2026

Introduction

Businesses today are operating in a rapidly changing global context, punctuated by rising geopolitical tensions, declining democratic governance, and weakening rule of law. These dynamics are accelerating inequality, climate change and nature loss – all of which impact people and their rights.

Unilever's Sustainability Strategy is built around four priority pillars – climate, nature, plastics, and livelihoods – underpinned by our steadfast commitment to respecting human rights. This paper sets out our approach to human rights due diligence, in line with the UN Guiding Principles on Business and Human Rights (UNGPs), across our operations and value chain. It also highlights how we engage in collaborative partnerships and advocacy to drive industry-wide and systemic change.

This is a living document, which we will continue to update as our work evolves.

Policy and Governance

Governance

Respect for human rights underpins everything we do and is embedded into our organisational structure. Governance of our human rights due diligence and risk management is overseen by the Unilever Board of Directors and its Corporate Responsibility Committee (CRC). The CRC's remit includes safety, security and wellbeing – with input from the Head of Sustainability, Livelihoods and Human Rights. In 2025, the CRC evaluated Unilever's Human Rights strategy, governance and accountability, focusing on priorities and potential risks to ensure clarity and alignment with our ambition and legal obligations. We continue to refine processes and ways of working to improve our effectiveness, including in relation to potential risks and issues in conflict-affected and high-risk areas (CAHRAs). For further information, see the Unilever Annual Report and Accounts 2025, p. 76).

The Unilever Leadership Executive (ULE) endorses the importance of human rights for the business and ensures they are integrated into top-level decision-making. The ULE is consulted on issues where the severity of an actual or potential impact is high, where business-critical decisions are taken, or where significant investment may be required. The Livelihoods and Human Rights team provides expertise and insights into emerging issues for the ULE to consider.

The business is also guided by the Unilever Sustainability Advisory Council, an independent body of external sustainability specialists, including a business and human rights expert, who advise and challenge our strategy. Responsibility for the delivery of our human rights strategy is shared across our Sustainability and Corporate Affairs team, Supply Chain and Procurement, Legal, HR, Finance and our Business Groups, coordinated through salient issue action plans.

Unilever's Reward Framework reinforces accountability. Our Performance Share Plan (PSP) links remuneration for management employees and the ULE to progress against our sustainability goals, including delivery of our living wage goal. Performance is measured against our Sustainability Progress Index (SPI). Further information can be found in our [2025 Annual Report and Accounts](#) (page 105).

Policy Framework and Contractual Requirements

Unilever's human rights policy commitments embed respect for human rights into the way we operate and are communicated at Board level. Our policies set clear expectations for our people and for the business partners we work with. They drive action consistent with our commitments, while assigning responsibility and accountability. In addition, we maintain internal standards and guidance documents that clarify processes such as preventing excessive working hours, ensuring due diligence when engaging temporary staff, and following protocols during land transactions.

The revised Respect, Dignity and Fair Treatment Policy and Responsible Sourcing and Business Partnering Policy within our updated [Code of Business Principles](#) sets out what employees must do to ensure that all workplaces respect human rights.

In 2025, we began a comprehensive review of our sustainability and human rights policies, standards, guidance, and supporting documents, which have evolved over time. This process streamlined and simplified in-scope documents under a consolidated framework, and we will be updating our [Responsible Partner Policy](#) (RPP) and Human Rights Policy this year.

We engage both internally and externally to raise awareness of, and compliance with, our policies. All business partners are required to provide contractual assurances that they meet the Mandatory Requirements of the RPP. Further information about this process can be found in our 2026 Modern Slavery Statement (p 5).

We monitor the effectiveness of our policies through dedicated programmes and committees. For our own operations, this includes oversight by the Global Code and Policy Committee. For business partners, effectiveness is assessed through the Responsible Sourcing Programme and the Procurement Business Integrity Committee. More details on these can be found on [Unilever.com](https://unilever.com).

Identifying, assessing and prioritising potential and actual impacts

We strive to identify and assess both potential and actual impacts on people, as well as the root causes behind them. Our aim is to prevent potential impacts from becoming issues, while continually monitoring for new and emerging risks.

As a global business operating in 190 countries, our human rights strategy follows a risk-based approach where we assess and prioritise risks based on impact materiality (salient risks) and financial materiality (financial risks). Our 2023 saliency assessment identified eight salient human rights, each assessed through the additional lenses of gender and climate impact, which help us understand how these factors can exacerbate risks.



We regularly review the severity (scale, scope, and remediability) and likelihood of human rights impacts across our operations and value chain to ensure we focus on the most serious issues. We will carry out a review of our salient human rights risks following the completion of our Ice Cream business demerger. Further details will be reported in our next Annual Report and Accounts.

We take a multidimensional approach to identifying potential and actual human rights impacts in our global value chain, drawing on a range of data sources. Further details about this approach can be found in our [2026 Modern Slavery Statement](#) (p 6).

Our Business Integrity team oversees procedures and controls to prevent, detect, and respond to human rights impacts in our operations. We analyse breaches of our Code of Business Principles to identify root causes and improve performance. More information on our Business Integrity programme is available on [Unilever.com](https://www.unilever.com).

We also monitor for situations where there is a risk of Unilever being linked to negative human rights impacts or to conflict. Where risks are identified, we apply proportionate due diligence.

In 2025 we initiated a review of our existing purchasing practices to evaluate potential impacts on working conditions. This work will continue in 2026 and we will provide an update in our next Annual Report and Accounts.

Rightsholder engagement is central to our due diligence approach, including in identifying potential and actual human rights impacts. We gather insights through direct worker engagement, partnerships, and technology solutions such as mobile apps and survey platforms, which help to inform our actions to address impacts. We have engaged with rightsholder proxies in a programme led by the Oxfam Business Advisory Service, Oxfam Brasil, CONTAR and AIM-Progress to assess and improve existing grievance mechanisms in the Brazilian sugarcane sector, and directly with workers in our value chain in our supplier development programme (see p 9 of our 2026 Modern Slavery Statement).

Prevent and mitigate

In line with the OECD guidelines, we address potential human rights impacts through prevention and mitigation measures. Actual impacts are addressed through mitigation and remediation (see section below for more on remediation). Our response to potential and actual adverse human rights impacts considers several factors, including the location of the issue, our leverage, and our relationship to the impact (whether we have caused, contributed to, or are linked to it).

Our actions to prevent and mitigate impacts include:

- Embedding effective management systems across our own operations and supporting suppliers to do the same
- Delivering training and capability building with appropriate partners
- Collaborating in partnerships with peer companies, suppliers and expert partners to address root causes of impacts and drive systemic industry-wide change
- Engaging in advocacy in support of strengthened regulatory requirements that create a level playing field for business to carry out effective human rights due diligence that addresses risks and impacts

Training for our own employees

All employees are trained on our Code of Business Principles & Code Policies, which include human rights requirements. We maintain robust safety protocols and

regularly update safety guidance for employees. Further information is available on [Unilever.com](https://unilever.com).

Employees have access to learning resources on demand, including short interactive e-learning modules and function-specific training to build deeper expertise. The Responsible Business team carries out training sessions for procurement colleagues, covering all aspects of the RPP. This team also shares case studies on internal channels to raise awareness and show how we support suppliers to remediate impacts.

We also engage in regular consultations with trade unions, both formal and informal, including with the [International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations](#) (IUF) and [IndustriALL](#). These consultations support constructive dialogue on workplace practices, enabling proactive approaches to industrial and employment relations issues.

Training and capability building in our value chain

We are focused on building a supply chain ecosystem where our business partners champion human rights and their employees exercise their rights freely. We aim to work collaboratively with business partners and make resources available to them, including our [RPP Implementation Guidance](#), which provides support on implementing the Fundamental Principles of Unilever's RPP. E-learning modules are also available on our website to support business partners on specific issues such as responsible recruitment and gender integration.

We regularly publish case studies about our work to address risks and issues on [Unilever.com](https://unilever.com), including programmes focused on our own supply chains, as well as industry-level collaborations with partners and peer companies.

Industry partnerships

We work through industry platforms such as the [Consumer Goods Forum](#) and [AIM-Progress](#) to drive improvements at scale. We also input funding into [The Office of the High Commissioner for Human Rights \(OHCHR\) Helpdesk on Business and Human Rights](#), a global resource supporting businesses, states, rightsholders, civil society organisations and other relevant actors to effectively understand and apply the UNGPs. This platform is particularly valuable for SMEs with limited resources, helping them strengthen their human rights due diligence and address risks and impacts effectively.

Advocacy

Unilever proactively engages in advocacy where our risk exposure is high and our scale enables meaningful impact. We currently focus our social sustainability and

human rights advocacy strategy on living wages and addressing forced labour risks and issues. Unilever acts as a co-chair of the Living Wage & Incomes Working Group within the [Business Commission to Tackle Inequality](#), and we have engaged with the [International Labor Organization](#), [UN Global Compact](#), [IDH](#) and the [World Benchmarking Alliance](#) to strengthen foundations on which governments can develop policies.

Unilever participates in the Forced Labour Forum, led by the UK Home Office Modern Slavery Unit, and are supportive of due diligence legislation which is key to creating a level playing field for businesses to operate responsibly. Further information about our advocacy in this area can be found in our [2026 Modern Slavery Statement](#) (p 12).

Access to remedy and remediation of impacts

Effective grievance mechanisms are essential for listening to, understanding, and acting on the concerns of our employees, workers in our value chain, and individuals and communities in the areas where we operate. When a potential impact or risk is reported or identified, we work to address it – often in collaboration with relevant stakeholders. Where an impact is substantiated, we remediate it, verify the effectiveness of the remediation, and strengthen processes to help prevent recurrence.

Own operations

For employees, our Business Integrity programme manages cases reported through the [Speak Up](#) platform. Once a grievance is received, it is formally acknowledged. Where possible, we provide transparency on the progress and expected timeframe of investigations.

Business Integrity Committees are responsible for ensuring timely investigations of alleged or suspected breaches of the Code of Business Principles. The target is to reach a determination within 60 days. More information is available on [Unilever.com](#).

Investigation outcomes are analysed to identify trends and opportunities for improvement. Quarterly, we consolidate case information across geographies to capture lessons learned and develop best practice examples. These insights are shared with functional and country leaders, Code Policy owners, and our wider Business Integrity network.

We strive to ensure grievance mechanisms in our own operations meet the effectiveness criteria of the UNGPs. This expectation also applies to business partners under our RPP. In 2026, we will conduct a review of the effectiveness of our [People and Nature Grievance Mechanism](#) against the UN Guiding Principles on Business and Human Rights.

Value chain

Business partners, workers in our value chains, communities, and other stakeholders can report suspected or actual breaches of the RPP - including misconduct by Unilever workers or representatives - via phone or online, confidentially and anonymously (where permitted by law). Our [People and Nature Grievance Mechanism](#) also provides a framework for handling, investigating, and resolving social and environmental issues in our supply chain.

Where an audit identifies an issue, we require the business partner to establish a Corrective Action Plan (CAP). Findings classified as "business critical" - significant human rights contraventions - are escalated to Unilever by auditors within 24 hours. Business partners must provide an action plan to address such issues within seven days.

All non-conformances require follow-up audits by an independent third party within 90 days to confirm remediation. In some cases, issues cannot be fully resolved within this period - for example, where significant capital investment or major operational changes are required. In these situations, suppliers must provide an interim plan to mitigate risks until a permanent solution is in place.

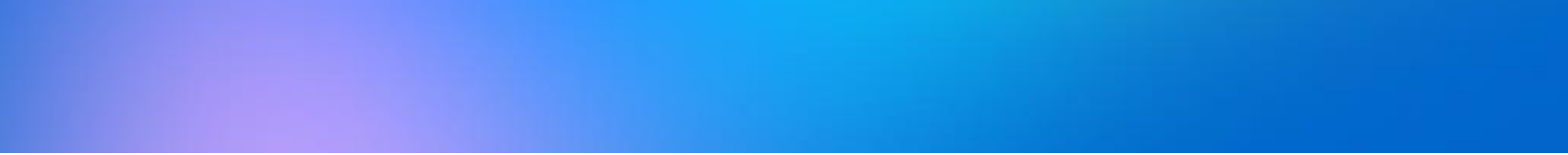
To support business partners, we provide [Responsible Partner Policy Implementation Guidance](#), which includes resources and checklists to help prevent, remedy, and avoid recurrence of impacts.

Where suppliers do not sufficiently engage in remediation, we seek to use leverage through constructive engagement. Termination is considered only as a last resort, when adverse impacts cannot be addressed. Our internal Responsible Disengagement Guidelines provide teams with a framework for considering the potential human rights consequences of commercial decisions, including country, regional, or sector exits. Further information is available on our Human Rights in our own operations page.

Monitoring

Measuring our impact

Measuring the impact of our human rights work is complex, as changes are often incremental and gradual, making progress difficult to capture and quantify over time. Best practice in this area continues to evolve, and we are adapting our approach accordingly. We have included impact measures within our salient issue action plans that enables us to consistently assess the impact of our human rights strategy. Our measures are aligned with the framework and indicators developed by the AIM-Progress impact measurement working group, strengthening industry-wide alignment on impact reporting. This remains a work in progress, as we refine indicators and improve the quality of available data.



Our supplier performance management process focuses on evaluating and improving supplier performance to ensure quality, enhance operational efficiency, and maintain compliance with our RPP. We provide structured feedback to suppliers, collaborate with them to develop and implement improvement plans, and recognise top performers through awards and incentives. This encourages continuous improvement and strengthens our supplier relationships.

Human rights due diligence is an ongoing process, and we continue to adapt our approach as we learn. We will keep building on our scale and collaborating with other companies, civil society, trade associations, governments, and rightsholders to address the root causes of human rights issues and to drive systemic, lasting change.