



# Unilever

## Code of Business Principles and Code Policies

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# The Code and our Standard of Conduct



The Code  
of Business  
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# Our Framework

## Our Values

**Our Values** of Integrity, Respect, Responsibility and Pioneering are the simplest statement of who we are. They govern everything we do.

## Code of Business Principles

Our **Code of Business Principles** is a simple ethical statement of how we should operate. We publish this externally and expect all others who work with us to set themselves equally high principles.

## Code Policies

Our **Code Policies** define the ethical behaviours that we all need to demonstrate when working for Unilever. They are mandatory. While these are for internal use, we also publish them externally in support of transparency.



# Foreword from **Hein Schumacher**

## **Welcome to the most important document we have at Unilever – our Code of Business Principles.**

Unilever's high standards for how we do business is one of my most enduring memories of working within the company at the start of my career in the 1990s.

Whilst a lot has changed since then, our commitment to doing the right thing and treating people with respect and dignity is reassuringly unchanged.

We have always been a purpose-driven company and our success today, tomorrow and into the future is built on our shared commitment to always doing business with integrity.

This important document sets out the clear standards of conduct we are all required to uphold both individually and collectively. It is there to ensure we make the right choices as we go about our daily work and it also provides clear guidelines to help us prevent, detect and respond to any concerns.

This document exists to protect our people, our assets, our reputation, the communities in which we operate, our consumers, customers and our partners right across our value chain. It exists to make our company stronger.

Whether we have 25 years' service or joined only a matter of weeks ago, each of us must ensure we are familiar and fully up to date with our Code. Doing so ensures we understand both our responsibilities and our rights, and know when to speak up and raise concerns with confidence.

Thank you for living and upholding our Unilever Code of Business Principles today and every day.

Hein



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# The Code of Business Principles (1 of 2)

## Introduction

At Unilever we believe in growing responsibly and sustainably.

Our Code of Business Principles defines the non-negotiables for all our employees. It codifies our values, making clear what is expected from our people.

Through living our Code, we will bring our values and purpose to life, every day in everything we do.

## Standard of Conduct

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees.

We shall similarly respect the legitimate interests of those with whom we have relationships.

We are committed to providing transparency across all our operations ensuring stakeholders trust what we do.

## Obeying the Law

Unilever companies and employees are required to comply with the laws and regulations of the countries in which we operate.

## Employees

Unilever is committed to a working environment that promotes diversity, inclusion, life-long learning and equal opportunity, including for those with disabilities. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards and in line with industry standards in the markets in which we operate. We are committed to giving employees a living wage, ensuring that they can meet their everyday needs.

We will not use any form of forced, compulsory, trafficked or child labour.

We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We will maintain good communications with employees through company-based information and consultation procedures.

We will provide transparent, fair and confidential procedures for employees and third parties to raise concerns. We will not retaliate against whistle-blowers or employees that raise issues with us.

## Consumers

Unilever is committed to providing purposeful branded products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. Products and services will be accurately and properly labelled, advertised and communicated.

## Shareholders

Unilever will conduct its operations in accordance with internationally accepted principles of good corporate governance. We will provide timely, regular and reliable information on our activities, structure, financial situation and performance to all shareholders.

## Business Partners

Unilever is committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principles consistent with our own. This means compliance with our third party policies and a commitment to working with us to address issues that negatively impact society and the planet. We will work with these partners to raise standards so that their employees are paid a living wage and are not subject to forced, compulsory, trafficked or child labour.



# The Code of Business Principles (2 of 2)

## Compliance – Monitoring – Reporting

Compliance with these principles is an essential element in our business success. The Unilever Board is responsible for ensuring these principles are applied throughout Unilever.

The Chief Executive Officer is responsible for implementing these principles and is supported in this by the Global Code and Policy Committee which is chaired by the Chief Legal Officer.

Day-to-day responsibility is delegated to all senior management of the geographies, divisions, functions and operating companies. They are responsible for implementing these principles, supported by local Business Integrity Committees.

Assurance of compliance is given and monitored each year. Compliance is subject to review by the Board supported by the Corporate Responsibility Committee and for financial and accounting issues the Audit Committee.

Any breaches of the Code must be reported. The Board of Unilever will not criticise management for any loss of business resulting from adherence to these principles and other mandatory policies. Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.

## Community Involvement

Unilever strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies and communities in which we operate.

## Innovation

In our scientific innovation to meet consumer needs we will respect the concerns of our consumers and of society. We will work on the basis of sound science, applying rigorous standards of product safety.

## Competition

Unilever believes in vigorous yet fair competition and supports the development of appropriate competition laws. Unilever companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

## The Planet

Unilever is committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business.

Unilever will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

## Public Activities

Unilever companies are encouraged to promote and defend their legitimate business interests.

Unilever will co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests.

Unilever neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

## Bribery & Corruption

Unilever does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe.

Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Unilever accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

## Conflicts of Interests

All employees and others working for Unilever are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company.

Employees must not seek gain for themselves or others through misuse of their positions.

## Data

Unilever is committed to the responsible, ethical and fair use of data.

We collect and use data in line with our values, applicable laws and with respect for privacy as a human right.

## Note

In this Code the expressions 'Unilever' and 'Unilever companies' are used for convenience and mean the Unilever Group of companies comprising Unilever PLC and its respective subsidiary companies. The Board of Unilever means the Directors of Unilever PLC.



# Living the Code (1 of 2)

As a purpose-led company, our values are the foundation of our success and essential to achieving our ambition of making sustainable living commonplace.

Living the Code means to put our values into practice and reiterate our commitment to doing good; this helps us to deliver value with values. Our consumers and customers trust us for doing business with integrity. This is one of our greatest assets, and to maintain our reputation, requires the highest standards of behaviour.

Unilever's Code of Business Principles (the Code), and the policies that support it (Code Policies), set out the standards required from all our employees. Unilever also requires its third-party business partners and their employees to adhere to business principles consistent with our own.

These expectations are set out in Unilever's [Responsible Sourcing and Business Partnering Policy](#) that underpin our third-party compliance programme.

Breaching the Code or Code Policies could have very serious consequences for Unilever and for individuals involved. Where illegal conduct is involved, these could include significant fines for Unilever, imprisonment for individuals and significant damage to our reputation.

This Code Policy explains how to ensure the Code and all Code Policies are understood and followed by all our employees and others working for Unilever. It confirms everyone's responsibility to speak up and report suspected or actual breaches, and outlines how such situations must be managed. Any failure to comply with the Code and any of the Code Policies is taken very seriously by Unilever and may result in disciplinary action, including dismissal and legal action.

## References in the Code and Code Policies to 'employees' include the following:

- Unilever employees, whether full time, part time, fixed term, permanent or trainees
- Persons with statutory director roles or equivalent responsibilities
- Unilever employees of joint ventures
- Employees of new acquisitions, from the date that the company is acquired

Living the Code is a team effort. The Code and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code and Code Policies must be upheld by exercising common sense and good judgement, always in compliance with applicable laws.

## Musts

All [employees](#) must:

- Ensure they know and understand the requirements of our Code and Code Policies
- Undertake relevant training (including the completion of the annual Code declaration) as required by their Line Manager or Business Integrity Officer
- Follow the Code and Code Policies: if they are unsure of how to interpret these or have any doubts about whether specific behaviours meet the standards required they must seek the advice of their Line Manager or Business Integrity Officer
- Immediately report actual or potential breaches of the Code or Code Policies, whether relating to them, colleagues or people acting on Unilever's behalf and whether accidental or deliberate. This includes instances where business partners' behaviour may not meet the same standards



# Living the Code (2 of 2)

## Musts

Their Line Manager is usually the right person to report potential or actual breaches. If this is not appropriate, they must talk to one of the following:

- Their Business Integrity Officer
- A member of the Business Integrity Committee in the country where concerns occur
- Unilever's confidential [Code Support Line](#) (where allowed by local law), by telephone or web using the telephone number or web address communicated locally
- If asked not to report a potential breach by their Line Manager or another employee, they must immediately report it to their Business Integrity Officer and / or the Code Support Line

In addition, those at Manager level and above must:

- Lead by example, setting a strong tone from the top, showing they are familiar with the Code and Code Policies and taking steps to embed a culture of integrity across all operations
- Ensure that all their team members, including new joiners:
  - Have read the Code and Code Policies
  - Have completed any related mandatory training
  - Understand how to raise concerns and / or report actual or suspected breaches
- Deliver training that the Business Integrity Committee or their Line Manager has asked of them, e.g. Business Integrity Moments, face-to-face briefings and team discussions
- Offer guidance and support about the Code and Code Policies to their team where needed and escalate unresolved questions to their Business Integrity Officer
- Ensure that anyone who raises concerns, or highlights potential or actual breaches, receives support and respect and that there is no retaliation against them
- Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion and discussing them with their Business Integrity Officer as soon as possible to determine the appropriate course of action including whom else to inform
- Collaborate further and complete any documentation (e.g. case information and lessons learnt) as may be required of them by their Business Integrity Officer
- Insofar as a breach may have occurred within their operations, consider what additional communications, training or changes to business controls and procedures are necessary to reduce the likelihood of similar breaches occurring

## Must nots

Employees **must not**:

- Ignore or fail to report situations where they believe there is or may be a breach of the Code or Code Policies
- Attempt to prevent a colleague from reporting a potential or actual breach or ask them to ignore an issue
- Retaliate against any person who reports a potential or actual breach
- Discuss any potential or actual breach under investigation with other persons, unless this has been cleared with the investigation team



# Legal Consultation (1 of 2)

Employees must at all times comply with laws and regulations that apply to the countries in which Unilever operates. Ignorance of the law is no excuse. Timely legal consultation is essential to ensure that Unilever's legitimate business interests and opportunities are protected.

This Code Policy sets out how and in what circumstances employees must seek legal advice from Unilever Legal Group.

## Musts

Heads of all Business Groups, Business Units, Global Business Units, Countries, or members of Senior Leadership teams must ensure the relevant Legal Business Partner is a member of that leadership team upon request and / or that they have an open invitation to attend all team meetings and receive copies of all associated agendas and minutes.

All [employees](#) **must**:

- Immediately notify their Line Manager (or other appropriate person – see Code Policy on [Living the Code](#)) and take legal advice if they suspect or discover any illegal activity in relation to Unilever's operations or associated activities involving third parties.



# Legal Consultation (2 of 2)

## Musts

- Promptly seek advice from their Legal Business Partner in the following situations:
  - Commercial contracts, leases, licences and transactions – Commercial contracts for goods or services (unless Legal Group and/or BG General Counsel has expressly delegated authority to the business or set up a route for direct consultation of an external legal advisor); Contracts relating to intellectual property, such as, licences for technology, trademarks, joint development or technical assistance contracts; Treasury transactions, for example, raising equity or debt, asset leasing, derivative transactions (such as currency hedging or interest rate swaps) or guarantees of Treasury transactions; Transactions involving mergers, acquisitions, disposals or joint ventures
  - Litigation and regulatory action – Civil litigation, such as employment or contractual disputes, whether threatened or actual, by or against a Unilever company or employee, including commencement of or settlement of such litigation; Criminal prosecutions, whether threatened or actual, by or against a Unilever company or employee, or at Unilever's instigation;

Communication with government or regulatory bodies about investigations, including unexpected investigations, or where Unilever is seeking regulatory action, such as non-compliant labelling actions through local governmental bodies (see Code Policy on [Contact with Government, Regulators and Non-Governmental Organisations](#))

- Competition/antitrust – Compliance issues or questions involving competition/antitrust laws, such as trade terms, exclusivity arrangements or pricing; Meetings, contacts, collaboration, agreements or other activity, including participation in trade associations or industry groupings (formal and informal or ad hoc), which may involve the exchange of information with a competitor or restrictions on competition (see Code Policies on [Fair Competition](#), [Competitors' Information](#))
- Communication – Press releases that could impact Unilever's reputation or create legal liability, or contain 'inside' or 'price sensitive' information (see Code Policy on [Preventing Insider Trading](#))

- Claims, brands, trademarks, marketing materials – Product claims and marketing materials, including advertising, promotional materials, packaging and labelling, trade materials, advertorials, point-of-sale materials, and web content; Clearance for use of all brand names, marks, logos, slogans, celebrity endorsements and sponsorships; Maintenance, protection and disposal of trademarks, copyrights and domain names used by the business; Competitor challenges to claims, brands, trademarks either by or against a Unilever company

- Employment – Issues relating to non-compete obligations, employment disputes and terminations and non routine employment contract terms Safety – Product tampering or counterfeiting; Consumer complaints that may lead to legal disputes; Potential product recalls; Consumer, product, workforce or environmental safety incidents that could have legal implications

- Legal or governance structures – Changes to, or issues around, legal or governance structures at geographic or corporate level, such as changes in capital structures or Board membership, public company filings and arrangements/relationships with third-party shareholders

- Bribery and corruption – Bribery or corruption issues, including related allegations or uncertainty about situations that may have bribery or corruption implications (see Code Policy on [Anti-Bribery](#))

Employees must use their common sense and judgement in situations not covered above: if they are unsure, they must always err on the side of caution and consult Legal Group.

## Must nots

Employees **must not**

- Do anything that Legal Group has advised is illegal and/ or unlawful. Where an activity is not illegal and / or unlawful but legal advice highlights significant risks for Unilever, such as litigation, they must not proceed without express senior line management authorisation
- Appoint a private investigator without prior approval from their General Counsel

Employees outside Legal Group **must not**

- Appoint, manage or remove external legal counsel or pay any legal fees that differ from the fee structures agreed by Legal Group



# Responsible Risk Management



Risk management is integral to Unilever's strategy and to the achievement of Unilever's longterm goals. Our success as an organisation depends on our ability to identify and exploit the opportunities generated by our business and the markets Unilever operates in.

Unilever takes an embedded approach to risk management which puts risk and opportunity assessment at the core of the leadership team agenda. Unilever defines risks as actions or events that have the potential to impact our ability to achieve our objectives. Unilever identifies and mitigates downside risks such as loss of money, reputation or talent as well as upside risks such as failure to deliver strategy if it does not strengthen brand equities or grow in growing channels.

Unilever's Risk Management approach is embedded in the normal course of business with a set of global Principles of Risk Management with local implementation.

Its structural elements include:

- Governance of Unilever, organisational structure and delegation of authority
- Vision, Strategy and Objectives
- Code of Business Principles, Code Policies and Standards
- Risk and Control Frameworks
- Performance management and operational processes execution
- Compliance and assurance activities.

## Musts

All managers and above **must** implement Unilever's Principles of Risk Management as follows:

- Accountability: they must identify and manage the risks that relate to their role
- Risk Appetite: they must determine the level of risk, they are prepared to accept to guide them in deciding what mitigation should be taken
- Risk Mitigation: they must put adequate controls in place, and ensure that they are operational, in order to deliver their objectives

Where leadership teams of key global functions are responsible for any of Unilever's Key Business Risks, they **must**:

- Define the risk and ensure that mitigating actions are taken as required
- Ensure supporting documentation is available

Leadership teams of Business Groups, Business Operations, Unilever International, Africa, and any listed entities where risk assessments are a regulatory requirement **must**:

- Complete an annual holistic business risk assessment during which:

- Key business risks for which they are responsible are identified;
- How those risks are being managed is reviewed;
- Any gaps in their desired risk appetite are identified.

- Perform regular reviews and ensure risks are mitigated as desired.

Heads of Countries **must**:

- Highlight significant country regulatory or statutory compliance risks to either the relevant Business Group(s) or the Chief Legal Officer;
- Highlight significant country customer or channel risks to either the relevant Business Group(s) or the Chief Digital & Commercial Officer

All project leaders of transformational projects **must**, together with their teams:

- Identify the key risks associated with their project achieving its objectives
- Prepare risk mitigation plans
- Review progress with the project steering group.

# Responsible Innovation



Innovation is fundamental to Unilever's business success and a core part of our global strategy. The integrity and objectivity of our Science are a key foundation for our approach to responsible innovation. Safety is non-negotiable.

Unilever conducts responsible, safe and sustainable research and innovation, which fully respects the concerns of our consumers and society. In meeting consumer needs, Unilever's innovations are based on sound science and technology, and reflect high standards and ethical principles.

Unilever has global standards that apply to all research and innovation, including on: the safe and sustainable design of new products, processes and packaging; product and brand development; open innovation collaborations; and publication of our scientific research.

## Musts

All [employees](#) involved in scientific research and innovation activity **must** comply with all standards relevant to their area of work, notably in order to:

- Ensure that risks for consumer safety, occupational safety and the environment are suitably assessed and managed
- Ensure appropriate specifications of raw materials, products and packaging
- Ensure effective management of consumer safety risks from food allergens
- Ensure research on human subjects is conducted to the highest ethical standards

- Uphold Unilever's commitment to eliminate animal testing without compromising on consumer safety (see Developing Alternative Approaches to Animal Testing)
- Ensure the integrity, robustness, objectivity and transparency of all scientific research and collaborations with external partners (see Unilever's Position on Science with Objectivity and Integrity)
- Maintain and make accessible records of all research, including study protocols and data, and their interpretation and decisions made
- Raise any concerns about actual or potential non-compliance with this Code Policy with their Business Integrity Officer, Line Manager or their relevant Business Partner in R&D

## Must nots

Employees **must not**:

- Deliver presentations or publications that have not been approved via internal clearance procedures
- Collaborate with third parties outside a structured and approved contractual framework

# Product Safety & Product Quality



Unilever's reputation and success is founded upon providing safe high quality products and services that meet all applicable standards and regulation, both internal and external within the end to end value chain.

All employees have a role to play in ensuring that the products and services we provide meet and / or exceed the expectations of our consumers and customers.

Unilever will take prompt and timely action to recall products or services that don't meet our own high standards or those required by the marketplace.

## Musts

### Employees **must**:

- Apply effective processes to measure and record product and process performance and, where appropriate, take effective preventative steps or corrective action to assure great product quality experiences for our customers and consumers
- Promptly and proactively report all product safety or product quality concerns to their Line Manager or Business Integrity Officer

## Must nots

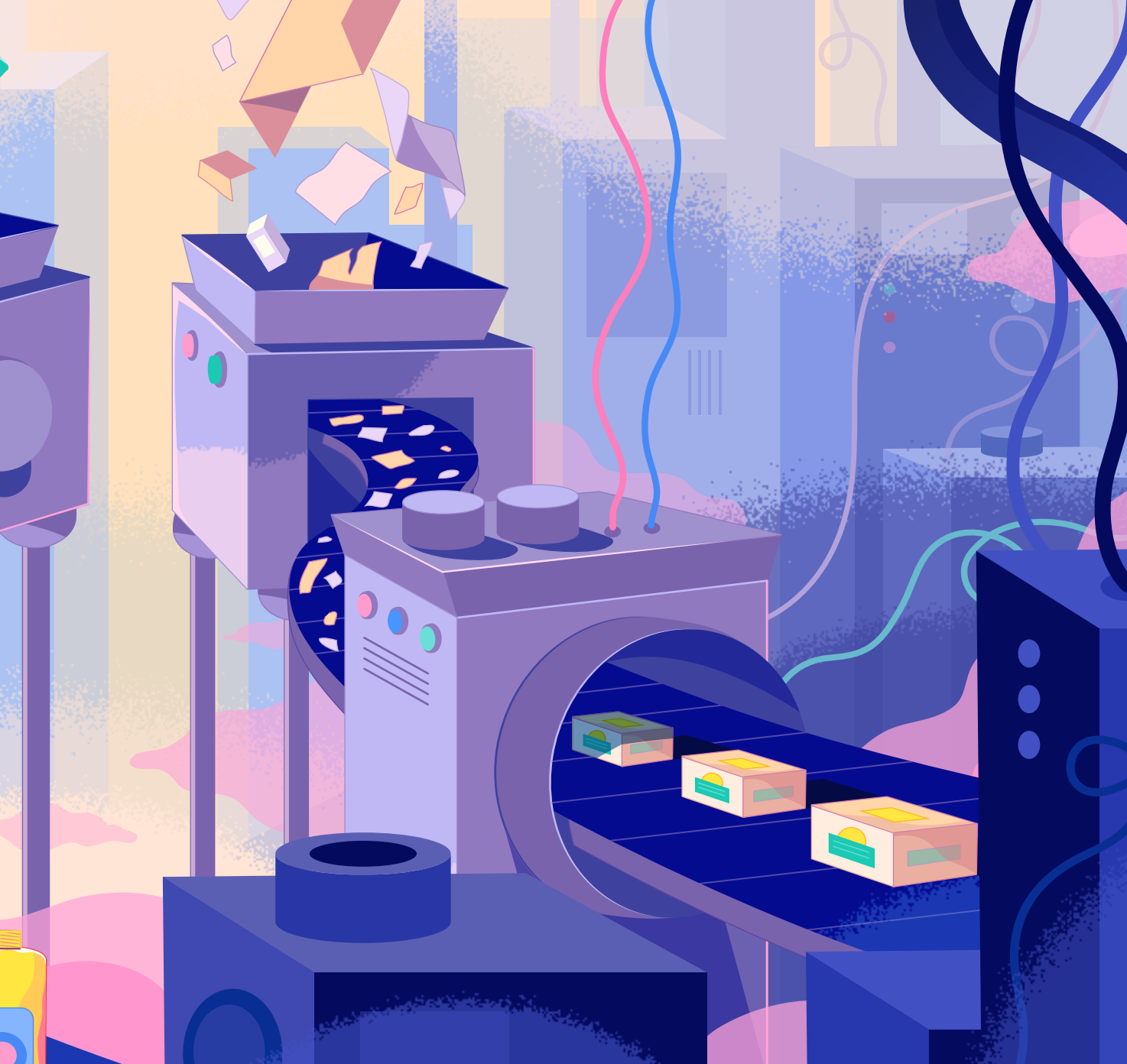
### Employees **must not**:

- Knowingly produce or distribute products, including promotional items, or services that could adversely impact employees' or consumers' health, endanger customers or adversely impact Unilever's brand reputation
- Take decisions about product safety or product quality without the authority and / or sufficient knowledge to do so
- Respond to customers or consumers about the product quality or safety of products without authorisation to do so



# Countering Corruption

Integrity defines how we behave, wherever we are. It guides us to do the right thing for the long-term success of Unilever.



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# Avoiding Conflicts of Interest

Conflicts of interest can have a significant negative impact on the reputation and effectiveness of Unilever, its business and its people. They 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.

This Code Policy sets out what employees must do to prevent and to manage these situations.

A conflict of interest may arise, and disclosure is required, when an employee:

- Hires, manages, or has an influence on the workload, performance assessment, granting of approvals and / or reward of someone with whom they have a close personal relationship
- Accepts or performs a [Public Official](#) role, or has a [family member](#) or a close personal contact who is a Public Official with the ability to take decisions that could impact Unilever business
- Has a close personal interest in the business of competitors or other third parties relevant to Unilever. This includes cases where the employee, their family members or a close personal contact:
  - work for or provide any services to competitors or to any other third parties relevant to Unilever's business

- hold investments other than in publicly traded pension funds, index linked or tracker funds that represent:
    - Substantial interests in a competitor, State controlled or influenced entity, or any other third party relevant to Unilever business (5% of the net worth of any of these entities)
    - Any interest in a third party if they, or one of their team, are involved in engaging, monitoring or investigating the third party's performance
  - Produces, promotes or advises on products or services that could be in direct competition with Unilever. This prohibition extends to paid or unpaid engagements to advise on products, services, processes or systems that may be relevant to Unilever.
  - Allows their non-financial interests such as personal values, beliefs, welfare and political views to take precedence over Unilever's lawful and ethical expectations, affecting their performance or objectivity at work
  - Follow the process outlined [here](#) to immediately disclose an actual, perceived or potential conflict of interest to their Business Integrity Officer who will determine the best way to manage the situation in consultation with the employee's Line Manager
  - Follow the same process if they are interested in taking up, in a personal capacity, a proposed directorship (or equivalent) of another organisation, whether commercial or not-for-profit, including roles in trade associations and roles for public bodies. This obligation extends to new joiners that hold directorships and have not disclosed them as part of the recruitment process
- The above disclosure requirements excludes roles of school governors, governing positions in amateur sporting or recreational groups, and directors of property/housing blocks in which an employee lives
- Obtain written approval from the Chief Legal Officer and the Chief Business Integrity Officer, before becoming a director of any publicly listed company
  - Ensure that external commitments do not:
    - Detract them from their commitment and contribution to Unilever
    - Provide access to commercially sensitive information concerning actual or potential Unilever

competitors (see Code Policies on [Fair Competition](#) and [Competitors' Information](#)); and / or

- Create any liability for Unilever. The employee must inform the other organisation that they take up this position on a personal basis, with no responsibility for Unilever and that any fees or benefits that arise from their engagement are not passed on to Unilever

## Must nots

Employees **must not**:

- Accept appointments, debate, vote, or participate in any decision-making process or activity when a conflict of interest exists or might arise before their Business Integrity Officer has provided clearance
- Take, or divert to others, any business opportunities that arise in the course of doing their job at Unilever that could be of interest to Unilever
- Misuse their position in Unilever to advance personal interests
- Hire, contract or engage any individual or organisation without ensuring they are free of conflict of interest with Unilever
- Hire or retain the services of former Public Officials without following Unilever's Principles on 'revolving doors'.

## Musts

[Employees must](#):

- Ensure Unilever is best placed to benefit from potential business opportunities

# Anti-Bribery



To support global efforts to fight corruption, most countries have laws that prohibit bribery: many apply these 'internationally' to behaviour beyond their borders. A breach of such laws may result in legal and financial consequences for Unilever and individuals. Dealings with public officials are particularly high risk: even the appearance of illegal conduct could cause significant damage to Unilever's reputation.

Unilever's commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to all Unilever operations, regardless of local business practices, and prohibits both public and commercial bribery (e.g. to or from any third party).

This Code Policy covers what employees must and must not do to meet Unilever requirements.

## Musts

### Employees must:

- Always make clear, internally and when dealing with third parties, that Unilever has a zero tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour to improperly influence a business outcome
- Immediately notify their Business Integrity Officer and Business Group and Country General Counsel if they become aware of any suggested or actual payment or other transaction which has the potential to be in breach of this Code Policy
- Follow Unilever's third party compliance policies and controls in accordance with the [Responsible Sourcing and Business Partnering](#) Code Policy
- Use electronic communications or e-government solutions (in areas such as licencing, procurement, taxes, brand protection, etc) or any other means available to reduce face-to-face interactions with public officials and the connected risks of bribe solicitation

## Must nots

Employees **must not** directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

- 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 by any person about Unilever
- Request or receive bribes or improper advantages from any third party, which are, or give the impression that they may be, intended to influence decisions by Unilever about that third party

In exceptional situations where employees cannot escape imminent threat to their life, liberty, or physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details to their Business Integrity Officer and Business Group and Country General Counsel in the country where the incident occurred. This is to ensure that the matter can be fully investigated, necessary financial records kept, and further steps taken where appropriate (see also Code Policy on [Accurate Records, Reporting and Accounting](#)).

# Gifts & Hospitality (1 of 2)

All Unilever's relationships must reflect its ongoing commitment to doing business with integrity.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Unilever's business activities.

This Code Policy sets out responsibilities of employees in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are always prohibited. It also explains in what circumstances gifts or hospitality may legitimately be given or received.

## Musts

### Employees must:

- Apply this Code Policy in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest (see Code Policies on [Anti-Bribery](#) and [Avoiding Conflicts of Interest](#))
- Familiarise and observe the local monetary limits that Unilever has set separately for gifts and for hospitality, unless exempted in accordance with this Code Policy





# Gifts & Hospitality (2 of 2)

## Musts

### Gifts

Employees **must**:

- Ensure that any gifts offered (other than Unilever branded merchandise) or received do not exceed the local monetary limits for gifts, are one-off or irregular in nature and always comply with the Code Policy on [Avoiding Conflicts of Interest](#). Although employees are not required to record such gifts centrally, they must keep their own records for inspection. All exceptions require prior clearance by their Business Integrity Officer
- Ensure that if they are offered a gift that exceeds the local monetary limits for gifts they must politely decline and explain the Unilever rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely preclude their return, employees must:
  - Obtain clearance from their Business Integrity Officer; and
  - Where appropriate take steps for the gift to be donated to charity

- Ensure that all gifts by employees that take the form of Unilever branded merchandising materials must be legitimate and proportionate

### Hospitality

Employees **must**:

- Ensure that hospitality is only offered or accepted if:
  - There is a legitimate business interest in doing so
  - Its value does not exceed the local monetary limits for hospitality; and
  - It remains one-off or irregular in nature
  - It is in the form of a locally hosted meal, attendance at, or participation in an organised 'team-building' occasion, local cultural or sporting event, local industry award ceremony, business site visit or similar responsible activity
  - Usual business contacts from Unilever and other parties are physically present

Employees are not required to record such hospitality centrally, but must keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of, Unilever is approved using Unilever's standard local expense processing and clearance systems.

In exceptional circumstances where employees seek to offer or accept hospitality above the local monetary limits for hospitality, they **must**:

- Check their Line Manager supports the proposal
- Obtain clearance from their Business Integrity Officer; and
- Once approval is received, ask the third party to confirm that the offer or acceptance of such hospitality also complies with its equivalent gifts and hospitality policy

In other circumstances where employees are offered or asked for hospitality that exceeds relevant local monetary limits for hospitality they must politely decline by reference to this Code Policy.

## Must nots

Employees **must not**:

- Discuss, offer or receive any gifts or hospitality activity involving public officials or their family members without prior clearance from their Business Integrity Officer
- Offer or accept any gifts or hospitality, or any other favours which are intended or might be seen to influence business decisions or create an obligation to do something in return
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from their Business Integrity Officer
- Offer or accept any hospitality that is not consistent with the Code Policy on [Respect, Dignity and Fair Treatment](#), or may cause offence under local norms and customs

All clearances from their Business Integrity Officer referred to in this Code Policy must be obtained following the gifts and hospitality disclosure process available [here](#)

# Accurate Records, Reporting & Accounting

The financial reports and other information that Unilever maintains internally and the financial information it provides to shareholders, regulators and other stakeholders must be accurate and complete.

Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Procedures and processes must be in place to ensure that underlying transactions are properly authorised and accurately recorded.

Any failure to record transactions accurately, or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in fines or penalties for employees or for Unilever.

This Code Policy sets out what employees must do to ensure the accuracy of our business records and financial information.

## Musts

### Employees must:

- Record all transactions accurately, completely and promptly
  - Only perform transactions, such as buying, selling or transferring goods/assets, for which they are authorised
  - Ensure transactions they approve are legitimate and based on valid documentation
  - Notify their Business Integrity Officer and the Head of Finance of any potential fraud or arrangements to facilitate tax evasion, or other misrepresentation of accounting or other information, or if a 'facilitation payment' has been paid to avoid physical danger or due to an error in judgment
  - Where instructed in the context of a legal hold, retain records in accordance with Unilever's Data Retention Standard, or longer if required by local laws/regulations
  - Retain records that may be relevant to any ongoing audit, litigation or regulatory investigation, even if they exceed the normal retention period if instructed to do so
- Co-operate fully, openly and honestly with internal/external auditors, tax authorities and other regulators
  - Ensure they are aware of all information relevant to their work
- Employees who are responsible for reporting financial and other business information **must:**
- Comply with all applicable laws, for example, those regarding financial statements, tax and environmental requirements
  - Adhere to all applicable external reporting standards and regulations, such as international and national accounting standards, stock market listing standards and rules, financial regulator rules, health and safety requirements, corporate governance codes and regulatory standards
  - Follow Unilever's Accounting Manual, reporting instructions and timetables, information standards and information definitions
- Employees involved in accounting **must:**
- Ensure sales, profits, assets and liabilities are recorded in the correct time period

- Properly document assumptions that underpin accounting records, especially those relating to provisions, journal entries and contingent liabilities, including tax

All Senior Leadership must complete quarterly and annual Financial Reporting Declarations in line with instructions issued by Unilever Financial Group.

## Must nots

### Employees must not:

- Do anything to artificially inflate or shift sales or profit between reporting periods
- Create, maintain or procure others to produce or maintain undisclosed or unrecorded accounts, funds or assets
- Conceal, alter or falsify company records, accounts and documents

# Protecting Unilever's Physical & Financial Assets & Intellectual Property



Employees are responsible for ensuring Unilever's assets are protected.

For information on the protection of several other asset types see the Code Policies on [Occupational Health and Safety](#) and [Protecting Unilever's Information](#).

This Code Policy covers the protection of physical assets and property, financial assets and intellectual property.

## Musts

### Physical assets/property

#### Employees must:

- Take care to ensure that all Unilever physical assets and property they come into contact with while working are not damaged, misused or wasted. Physical assets and property includes factory and laboratory equipment, Unilever products or components, buildings, computers and company motor vehicles

The head of each Unilever site must:

- Identify potential hazards from activities and services on site
- Evaluate the risk of damage to site assets of such hazards and of any potential business interruption or liability that could result
- Take steps to reduce identified risks to an acceptable level

## Financial assets

#### Employees **must:**

- Protect Unilever's financial assets – such as cash, bank accounts and credit cards – guarding against misuse, loss, fraud or theft
- Only authorise commitments, expenditure, borrowing or other financial transactions in line with their role as specified in local, regional and / or global financial and / or treasury authority schedules
- Comply with the relevant Unilever standards when involved in hedging contracts or transactions

## Intellectual property

#### Employees **must:**

- Report to Business Group or IP General Counsel any suspected counterfeit products or any product, packaging, communication or marketing practice that are suspected of infringing our copyright, trademarks, patents, design rights, domain names and / or other intellectual property rights

- Ensure all necessary checks and filings have occurred with respect to patents, designs and trademarks or other intellectual property rights, when researching, developing or preparing to launch new brands, sub brands, services, designs, inventions, communication, advertising and promotional materials
- Ensure a contract is in place with appropriate clauses to protect Unilever's intellectual property rights and ensure freedom to use results when undertaking collaborative work with third parties

## Must nots

#### Employees **must not:**

- Remove Unilever's physical assets or property from company premises without permission or use them for inappropriate purposes
- Knowingly infringe the valid patents, design rights, trademarks, copyright and other intellectual property rights of any third party

# Anti-Money Laundering and Economic Sanctions

To protect Unilever's reputation and avoid criminal liability, it is important not to become associated – however innocently – with the criminal activities of others. In particular, employees must ensure Unilever is in compliance with economic sanctions laws and regulations and does not deal with the proceeds of criminal activities, as this can amount to the criminal offence of money laundering.

This Code Policy sets out essential steps employees must take to avoid breaching economic sanctions rules or being implicated in money laundering.

## Musts

### Employees must:

- Comply with the Responsible Sourcing and Business Partnering Code Policy, the [Global Economic Sanctions Standard](#), and any local anti-money laundering or sanctions procedures, when they onboard, contract or monitor third parties
- Immediately notify their Business Group and Country General Counsel if they have any suspicions about actual or potential money laundering activity or about transactions with sanctioned countries or sanctioned third parties
- Obtain prior clearance from their Business Group and Country General Counsel alongside senior Finance business partners before allowing any of the following events to happen:

### Third party requests to:

- Pay funds to a bank account in the name of a different third party or outside the country of their operation
- Take payments in a form outside the normal terms of business
- Split payments to several bank accounts
- Overpay

### Third party payments to Unilever:

- From multiple bank accounts
- From bank accounts from a different geography than the one where the third party is resident
- Deposited in cash when normally made by cheque or electronically
- Received from other third parties that have not been onboarded and/or are not part of the contract
- Made in advance when not part of normal terms of business

Employees involved in engaging or contracting with third parties such as new suppliers, customers and distributors **must:**

- Ensure that the third parties in question are subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening
- Determine, with guidance from their Business Integrity Officer, which tools and processes should be used to facilitate appropriate screening and record-keeping (see the [Responsible Sourcing and Business Partnering Policy](#))

- Carefully consider, where necessary in consultation with their Business Integrity Officer or General Counsel, screening outcomes before deciding whether to do business with the third party

Finance managers who support Supply Chain Management and Customer Development must regularly monitor and / or review suppliers, customers and other third-party service providers to identify business activity or governance that could indicate money laundering is taking place

## Must nots

### Employees must not:

- Simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put Unilever and its employees at risk
- Inform a third party suspected of money laundering that they are subject of an internal or external investigation. Employees must obtain guidance from their Business Group and Country General Counsel on how to handle the matter with the third party





# Respecting People

People should be treated with dignity, honesty and fairness. Unilever and its employees celebrate the diversity of people, and respect people for who they are and what they bring. Unilever wants to foster working environments that are fair and safe, where rights are respected and everyone can achieve their full potential.



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# Occupational Health & Safety

Unilever is committed to protecting and promoting the occupational health and safety of its people. This is supported by following Unilever's global occupational health standards and safety standards. These apply to all Unilever employees working at Unilever sites. In addition, Unilever complies with all applicable legislation and regulations and aims to continuously improve health and safety performance.

Everyone at Unilever has a role to play. Managers are responsible for communicating and implementing the occupational health and safety standards as they apply to their direct reports and third parties under their supervision. Employees are empowered to speak up about hazards without fear of retaliation. As a condition of employment, we all have a duty to work in a healthy and safe way.

This Code Policy outlines our individual and shared responsibilities for health and safety. Where local Unilever companies/entities are governed by a local board of directors, those entities are responsible for their employees' occupational health and safety, including the required occupational health and safety management systems and appropriate governance.

## Musts

Employees working at Unilever sites **must**:

- Work and behave safely and in a manner protective of health
- Comply with defined occupational health and safety procedures and instructions relevant to their work and / or about which they have been trained or notified
- Support team leaders to ensure that everyone they work with, including employees, contractors and visitors, are familiar with and follow applicable health and safety procedures and instructions
- Only undertake work that they are trained, competent, medically fit, sufficiently rested, functionally capable and alert enough to do
- Make sure they know what to do if an emergency occurs at their place of work / on the road or at a location they are visiting
- Promptly report to local Unilever management any actual or near miss accident or injury, illness, unsafe or unhealthy condition, incident so that steps can be taken to correct, prevent or control those conditions immediately
- Notify their manager or supervisor if there is a concern with meeting any of these minimum requirements.

All **Unilever team leaders** have overall operational responsibility for health and safety at their location and **must**:

- Establish and maintain an appropriate occupational health and safety at work management system for their sites and their teams, including the appointment of committees, managers, competent experts and a system for gathering concerns and input from employees, contractors, and visitors
- Identify occupational health and safety hazards and manage/control risks arising from their team and their site's routine and planned operations, activities and services
- Regularly review and comply with all applicable local occupational health and safety legislation, including relevant mandatory Unilever standards
- Develop site and role specific improvement objectives and monitor performance, including an annual review of the management system's effectiveness and adequacy
- Report mandatory Key Performance Indicators (KPIs) via Unilever's occupational health and safety reporting system
- Report all incidents, accidents and near misses in line with reporting requirements, including thorough investigation, follow-up and communication of lessons learned

- Maintain, communicate and test both site and role emergency plans
- Ensure all employees, contractors and visitors receive information and training in occupational health and safety relevant to their roles and activities in the local language
- Ensure all employees, contractors and visitors receive information and training about applicable emergency notifications and procedures in local language.

## Must nots

Employees **must not**:

- Breach the Life Critical Standards as outlined in the Unilever standards.
- Undertake work or related activity, when under influence of any substance that may negatively impact occupational health or safety
- Carry on with any work that becomes unsafe or unhealthy
- Assume someone else will report a risk or concern

Team leaders **must not**:

- Ask for any work to continue that becomes unsafe or unhealthy.
- Discourage reporting of a risk, concern, or incident.

# Respect, Dignity & Fair Treatment (1 of 2)

Business can only flourish in societies where human rights are respected, upheld and advanced. Unilever recognises that each business has the responsibility to respect human rights and the ability to contribute to positive human rights impacts.

There is both a business and a moral case for ensuring that human rights are upheld across Unilever's operations and value chain. Unilever is committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunity, and no unlawful discrimination or victimisation.

This Code Policy sets out what employees must do to ensure that all workplaces maintain such an environment.

## Musts

### Employees must:

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class, political views or any other class protected by law. This includes consideration of all terms and conditions of employment including, but not limited to, recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit

### Line Managers must:

- Ensure all employees' work is conducted on the basis of freely agreed and documented terms of employment, clearly understood by and made available to relevant employees and others working for Unilever
- Ensure that all employees have obtained employment with Unilever without the employee having paid a recruitment fee or related cost directly or indirectly as guided by the International Labour Organisation standards





# Respect, Dignity & Fair Treatment (2 of 2)

## Musts

- Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards, appropriate prevailing industry standards or a living wage – whichever is higher and that remuneration terms established by legally binding collective agreements are implemented and adhered to. Other than legally mandated deductions, all other deductions from wages require the express and written consent of the employee
- Respect employees' rights to form and join a legally recognised union of their choice or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions, labour management relations and matters of mutual concern, to the extent practicable taking national laws into consideration
- Comply with local legal requirements in relation to short-term, casual or agency employees
- Maintain a clear and transparent system of employee and management communication that enables employees to consult and have an effective dialogue with management
- Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or dignity

## Must nots

### Employees **must not**:

- Engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class, political views or any other class protected by law
- Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, including, but not limited to, making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicit nature, misusing personal information, creating a hostile or intimidating environment, isolating or not co-operating with a colleague, or spreading malicious or insulting rumours
- Work more than the regular and overtime hours allowed by the laws of the country where they are employed. All overtime work will be on a voluntary basis

### Line Managers **must not**:

- Use, or permit to be used, forced or compulsory or trafficked labour. We have a zero tolerance of forced labour
- Use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher
- When young workers are employed (insofar as short-term work experience schemes and work that forms part of an educational programme are permitted), require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling by depriving them of the opportunity to attend school

# Safeguarding Information

Information is essential to our success: it fuels our research, keeps us in touch with consumer needs and helps us work effectively together. If used inappropriately, information can cause considerable damage to our business.



# Protecting Unilever's Information



Information is one of Unilever's most valuable business assets: Unilever is committed to safeguarding and protecting our information and any other information entrusted to us.

Information within Unilever is held in many different formats, including on paper, electronically in documents or in IT applications & systems. Our requirements to protect information apply to all formats. Unilever has Information Classification & Information Handling standards which define how information within Unilever must be classified, handled and protected.

## Musts

When handling Unilever's information employees must:

- Understand the nature and classification of the information, as defined in the Information Classification Standard; understand and adhere to the handling requirements detailed in the Information Handling Standard; and take personal responsibility for the proper use, circulation, retention, protection and disposal of Unilever's information

- Only distribute or share Unilever's information on a need to know basis, ensuring that only employees or others working for Unilever, or authorised third parties, with a genuine business need, have access to the information
- Take care not to disclose information in public places, including taking all necessary steps to protect information in documents and on IT devices away from the workplace
- Comply with the proper use of Unilever Information Technology and only share Unilever information using Unilever-approved Information Technology in accordance with the Code Policy on [Use of Information Technology](#)
- Report any events which you suspect could impact the security of Unilever information by following the Cyber Security reporting procedures. For example, information being shared with someone who was not authorised to view it; if you have received or responded to a suspicious email, text message, phone call, instant message or MFA prompt; or any other relevant event.

## Must nots

Employees **must not**:

- Disclose Unilever's information externally to third parties unless in accordance with Unilever's Information Classification & Information Handling standards
- Use Unilever's information for anything other than a legitimate business purposes or as required by law.

Personal data relating to employees, consumers and other individuals is subject to specific laws and regulations in most countries and requires special handling. Additional information relating to the classification and protection requirements for personal and sensitive personal data can be found in the Code Policy on [Personal Data and Privacy](#)

If in doubt about how to handle any Unilever information, restricted or otherwise, employees must seek advice from their Line Manager, Business Information Security Officer and / or Legal Business Partner

# Preventing Insider Trading

Employees must not use inside information to buy or sell securities of Unilever PLC, or any listed Unilever subsidiary, or any other publicly traded company. Securities include shares, equities and related derivatives or spread bets.

Unilever's Disclosure Committee – on behalf of the Board – oversees that Unilever has the necessary procedures in place to ensure Unilever complies with applicable insider trading laws and regulations (see Unilever's Share Dealing Standard and Disclosure Manual).

This Code Policy explains what insider trading is, how employees can be sure they don't engage in it, and what to do if they discover inside information is being misused.

Trading or encouraging others to trade on inside information, or giving it to unauthorised parties, is a criminal offence in many countries: a breach of the applicable laws can lead to fines and / or imprisonment. Inside (or price sensitive) information means information that is not available to the public and that a reasonable investor would probably consider important in deciding whether to buy or sell a company's shares. Examples of inside information include the following:

- Business results or forecasts for the whole company or for one of our listed subsidiaries
- A major new product, product claim or product incident/issue
- An acquisition, merger or divestment
- A sizeable restructuring project
- Major developments in litigation cases or in dealings with regulators or governments
- Revisions in dividend policy
- Changes in executive directors.

## Unilever Insiders

Unilever maintains Insider Lists that name all employees and external advisors who have authorised access to Unilever's Inside Information (individuals will be notified by the Corporate Secretaries' Department if they have Inside Information status).

In addition to the general obligations set out above, individuals on the Insider Lists must also comply with the requirements in Unilever's [Share Dealing standard](#) and [Disclosure](#) Manual.

## Musts

### [Employees](#) must:

- Refer to Unilever's Share Dealing Standard and Disclosure Manual or contact the Corporate Secretaries' Department in the Legal Group, to check whether something is Inside Information
- Immediately advise a member of the Disclosure Committee (the Corporate Secretaries' Department holds the names of committee members) if they suspect or know that some Inside Information is not being managed as Inside information

## Must nots

Employees **must not**:

- Buy or sell securities of any listed company when in possession of inside information related to those securities –even if they believe they are not relying on it. This includes trading at times when there are market rumours that they know are false
- Encourage anyone to buy or sell securities of any listed companies when they have inside information related to those securities – even if they do not profit from the arrangement
- Pass Inside Information relating to Unilever to anyone within Unilever (unless they are on a relevant Unilever Insider List) or outside Unilever, including family members or friends (see the Code Policy on [Protecting Unilever's Information](#))
- Spread false information or engage in other activities to manipulate the price of publicly listed securities



# Competitors' Information



To promote fair competition Unilever gathers and uses competitor's information that is in the public domain, for example, from newspapers, the internet and company filings. This provides Unilever with valuable insights and helps us achieve our purpose of making sustainable living commonplace, and our vision that being a purpose-led, future-fit company will deliver superior performance.

This Code Policy outlines what employees and others working for Unilever must do to legitimately obtain and use competitor information and at the same time respect the confidentiality of competitor's information.

Unilever respects the confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public domain, has value and could be used for commercial benefit. Accepting or using competitor's confidential information risks being a serious infringement of competition laws and/or trade secrets/intellectual property laws, leading to significant penalties for Unilever and individuals.

Competitor information encompasses many areas from marketing and financial information to Intellectual Property such as 2D and 3D designs. If you are in any doubt consult your Legal Business Partner.

## Musts

### Employees must:

- Only gather and/or use competitors' information from the public domain
- Ensure the information is from a legitimate source and document the source
- Keep up to date with training and the latest policies on obtaining competitor information
- Clearly record the sources of data in all communications so their legitimacy is beyond doubt
- If they acquire a [competitor's confidential information](#) unintentionally, they must notify their Legal Business Partner immediately

## Must nots

### Employees **must not:**

- Seek to obtain competitor's confidential information from new employees or otherwise

# Personal Data & Privacy

Unilever respects the privacy of all individuals including employees and consumers and their personal data, including digital information Unilever holds about them. We will collect and use personal data in accordance with our values, applicable laws and with respect for privacy as a human right.

This Code Policy sets out what steps employees must take to ensure personal data is handled appropriately.

## Musts

When collecting, using or storing personal data **employees must:**

- Only collect data that is adequate and relevant and use it solely for the purpose for which it is collected
- Be transparent with individuals in relation to how their personal data is used in alignment with Unilever privacy notices
- Obtain consent from individuals in accordance with local law
- Keep personal data up to date correcting inaccurate information when requested and respecting individual legal rights
- Keep personal data confidential and secure
- Act responsibly and ethically, upholding Unilever's core values, always considering the risk to individuals in using their personal data and take steps to mitigate such risk

## Must nots

When collecting, using or storing personal data, employees **must not:**

- Retain personal data for longer than necessary to achieve the business objective or meet minimum legal requirements
- Transfer personal data outside the country in which it is collected without advice from their Legal business partner, as there may be legal restrictions/ requirements relating to the transfer
- Collect and use personal data for purposes that are not reasonably expected by our consumers and employees

If in doubt, employees must seek advice from their line manager and / or Legal business partner.



# Use of Information Technology (1 of 2)



This Code Policy explains how employees should use Unilever equipment and systems, or personal devices to access information at Unilever, responsibly and securely in compliance with all relevant laws and regulations

Employees are provided with access to Unilever systems, software, digital services, and equipment to carry out their role.

Employees are permitted to use Unilever Equipment for personal use if this does not expose Unilever to cyber risk or harm, or materially impact Unilever systems or operational resiliency. Material impact examples includes excessive storage, network usage, mobile data usage, storing non public data on personal storage or voice utilisation which may have an impact on the performance of the environment. Cyber risk is defined as an action that could expose Unilever systems or data or damage the Unilever brand.

To the extent permitted by law:

- 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. Unilever reserves the right to remove any software that is non compliant / unapproved



# Use of Information Technology (2 of 2)

## Musts

When using Unilever's Systems and Equipment, employees **must**:

- Ensure Unilever equipment is used appropriately and protected from damage, loss or theft
- Lock any device, used to access Unilever Information, when unattended (e.g. password, PIN or biometrics)
- Immediately report to the IT Service Desk the loss or theft of any Unilever equipment, or any personal device used to access or store Unilever Information
- Ensure any removable Unilever IT equipment is secured when left in the office overnight, is locked away or put out of sight when left unattended at home, in a hotel or in a vehicle. When travelling, keep it with you at all times
- Comply with copyright law and respect all applicable licenses for any graphics, documents, media and other materials stored on or accessed with Unilever systems or equipment
- Follow the appropriate process to install any software or applications on Unilever equipment and not install unapproved applications
- Only store Unilever data on approved storage platforms unless an exception has been sought and approved by Cyber Security

## Must nots

Employees **must not**:

- Try to disable, defeat or circumvent Unilever security controls, including but not limited to browser configuration, antivirus, privileged access, firewalls and system logs
- Use Unilever systems or Unilever equipment to intentionally access, store, send, post or publish material that:
  - Is pornographic, sexually explicit, indecent or obscene, or
  - Promotes violence, hatred, terrorism or intolerance, or
  - Is in breach of local, national or international laws
- Use Unilever systems or Unilever equipment to intentionally defame, slander or lower the reputation of any person or entity or their goods or services
- Run or engage in any form of private business using Unilever IT equipment
- Access Unilever Systems or Information after leaving Unilever employment
- Use removable media (USB storage) unless an exception has been sought and approved.
- Use a Unilever device for any activity that would be considered illegal by any operating countries Computer Misuse Acts
- Expose Unilever information by:
  - Using non-public Unilever information for anything other than Unilever business
  - Sharing or synchronising non-public Unilever information other than your own personal information (e.g. payslips), to personal accounts (e.g. email or storage) or devices not managed by Unilever
  - Sharing Unilever access credentials with anyone, including work colleagues (other than in defined circumstances pre- authorised by Cyber Security), friends and family
  - Using Unilever email addresses as an identity for non-business related activity
  - Using Unilever passwords anywhere else
  - Intentionally accessing Unilever Systems or Unilever Information that is not intended for their role

# Engaging Externally

Throughout our value chain, from innovation through to our consumers, Unilever and its employees need to demonstrate the same ethical standards when engaging with others externally as when dealing with colleagues.



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# Responsible Marketing

Unilever is committed to developing, producing, marketing and selling all its products and services responsibly. Unilever can and should conduct marketing activities in line with societal expectations.

This Code Policy sets out global minimum standards that apply to all of Unilever's marketing activities everywhere.

This covers but is not limited to: brand names, packaging and labelling; consumer planning and market research; trade advertising; sales materials; brand merchandising and sponsorship; all forms of advertising including television, radio, print, digital media, promotional activities and events, product placements, 'advergaming' – whether created by Unilever, agencies, crowdsourcing or other third parties.

## Musts

Employees who are involved in Unilever marketing activities **must**:

- At all times, respect applicable marketing laws
- Describe our products/services and their effects truthfully, accurately and transparently, with appropriate factual and, where relevant, nutritional information
- Ensure there is sufficient information for consumers and customers to understand how to use our products and services
- Ensure our marketing is based on adequate support for the claims Unilever makes
- Comply with our principles and standards on marketing, including (but not limited to) those with respect to children, women and social media
- Be mindful of the environmental implications of marketing activity, in such areas as new product development, marketing activation plans, packaging and content recycling



## Freedom of choice

Employees involved in Unilever marketing activities must show respect for people who choose not to buy our products and services, and ensure there is sufficient information about our products and services for consumers to make informed choices

## Taste and decency

Employees involved in Unilever marketing activities must ensure our marketing reflects and respects generally accepted contemporary standards of good taste and quality, in the context for which it is designed, showing awareness of both wider society and sensitivity to different cultural, social, ethical and religious groups.

## Must nots

Employees **must not**:

- Alter images used in marketing communications in such a way that advertising is rendered misleading
- Misuse technical data or use scientific terminology or vocabulary in such a way as falsely to suggest that a claim has scientific validity
- Associate our products or services with, or feature within any Unilever marketing, themes, figures or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability or minority group
- Advertise in any media known for promoting violence, pornography or insulting behaviour

# Responsible Sourcing & Business Partnering

As a purpose-led company, Unilever is committed to doing business in a manner that improves the lives of workers across our value chain, their communities and the environment. Unilever expects its business partners to adhere to values and principles consistent with our own.

This Code Policy sets out responsibilities of employees who engage with third parties.

Our requirements for third parties are set out in the [Responsible Partner Policy \(RPP\)](#) which governs both our Responsible Sourcing Programme for suppliers and our Responsible Business Partner Programme for distributors, customers and other parties.

Unilever could face legal and reputational liabilities if third parties fail to comply with these requirements.

The RPP outlines the fundamental principles and mandatory requirements that third parties must meet.

The team responsible for setting the standard of this policy is the Global Sustainability Team with the governance of and compliance with the Policy owned by the Business Integrity team.

## Musts

[Employees](#) who contract and / or work with Unilever's third parties **must**:

- Read and understand the RPP and consult their Line Manager and / or the relevant responsible teams if they have any questions
- Ensure that all our third parties are subject to our RPP policies and controls. This includes adequate and timely onboarding, contracting and monitoring (including verification and remediation where necessary)
- Ensure that all our agreements with suppliers (inclusive of MSAs, UPAs, CTCs, POs\*) and distributors and customers (including DOs\*), to the extent required by our internal controls, include contract clauses that specify that the business partner must acknowledge that they can meet the requirements of our RPP as a condition of engagement
- Notify their Line Manager and the relevant responsible team if they know or suspect that third parties are not meeting relevant RPP requirements or if they are performing contrary to the agreed contractual terms
- Ensure that any selection, shortlisting or tendering processes for new third parties consider their compliance with the RPP

## Must nots

Employees who contract and / or work with Unilever's third parties **must not**:

- Agree to any contractual changes or exclusions with respect to the RPP without consulting their Legal Business Partner and in respect of the RPP, prior written authorisation from the Responsible Business team
- Continue transacting with third parties that have been declared as not compliant with the RPP unless a dispensation or exemption is provided by the Responsible Business team or when they have been identified on the Prohibited Third Parties list



\*Footnote: Master Service Agreements, Unilever Purchase Agreements, Commercial Terms Contracts, Purchase Orders, Distribution Orders.



# Fair Competition (1 of 2)



Investigations by competition authorities may result in significant fines and costs, compensation claims by our customers and competitors, and damage to our reputation and commercial relationships. Criminal sanctions for individuals may also apply.

Competition laws prohibit:

- Anticompetitive agreements
- Sharing of commercially sensitive information between competitors, unless approved by Legal
- Certain restrictions imposed on or agreed with distributors and other customers; and
- Abuses of dominant market positions.

This Code Policy sets out what employees must do to ensure Unilever upholds fair competition.

## Co-operating with competition authorities

Unilever co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contacts with competition authorities (including, where relevant, national courts) are co-ordinated by the relevant Legal Business Partner. For more details, see the Code Policy on [Contact with Government, Regulators & Non Governmental Organisations \(NGOs\)](#).

## Musts

Heads of Country and Senior Leadership must, with the support of Legal, ensure that the requirements of competition law are understood by employees, contractors and agents operating in their organisation and country by providing appropriate documentation, communication and training, with tailored programmes for specific (in particular 'high risk') groups..

### Employees must:

- Comply with competition law for all categories and markets in which they operate and undertake all relevant training

# Fair Competition (2 of 2)

## Musts

- Before taking part in a trade association or industry event, ensure all mandatory requirements set out in the Unilever Standard on Trade Association Memberships have been complied with; this also applies to less formal meetings or events that involve competitors, such as awards ceremonies or associated social contacts
- Object immediately if inappropriate topics are raised during any contact with competitors and leave immediately – and noticeably – if any inappropriate discussion continues
- Report incidents of inappropriate discussions immediately to their Legal Business Partner
- Promptly seek advice from their Legal Business Partner:
  - Whenever you need help applying the competition rules laid out in this Policy to any specific business situation, and in any case of doubt
  - In situations which may involve the exchange of information with a competitor
- Before discussing joint purchasing arrangements, or production, research and development, and standardisation agreements with any competitors
- When contemplating restrictions on the commercial activity of a customer or a distributor
- In situations where Unilever might have a strong market position and Unilever's commercial practices could be perceived as unfair to customers or competitors
- Clearly record sources of competitor information in all communications and documents so their legitimacy is beyond doubt

## Must nots

Unilever prohibits participation in cartels in all countries, even those that do not have competition law.

### Employees **must not**:

- Participate in cartels
- Discuss, agree or exchange information about, any of the following, directly or indirectly, with competitors (unless approved by Legal Group):
  - The price or terms of sale for products and / or services
  - The price or terms to be demanded from suppliers
  - The co-ordination or allocation of bids or quotes
  - Limitations on production or sales; or
  - The division or allocation of geographic markets, customers or product lines
- Boycott or refuse to deal with certain competitors, customers or suppliers without first seeking advice from their Legal Business Partner
- Impose restrictions on the commercial activity of a customer or a distributor without first seeking advice from their Legal Business Partner, including control of the resale price, the territory or channels in which they may resell Unilever products and the extent to which they may sell competing products
- Where Unilever has a strong market position, conduct itself in order to take unfair advantage of customers or unfairly prevent competitors from entering, remaining or expanding in a market, e.g. selling below cost, certain types of conditional rebates, exclusivity arrangements

# 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](#))





# Political Activities & Political Donations



Unilever companies are prohibited from supporting or contributing to political parties or candidates. Employees can only offer support and contributions to political groups in a personal capacity.

This Code Policy sets out how employees must manage their business relationship with political groups.

Approval will only be given where the non-party-political nature of the activity has been publicly communicated as such by the advisory group, its work relates to areas supporting Unilever's corporate vision, and the group includes representatives from a broad range of organisations, such as well-known peer companies, national charities, non-political think-tanks, research organisations and representatives of academia, or similar such bodies.

## Musts

### Employees must:

- Ensure any contributions towards, and support for, political parties are clearly personal and give no impression of being connected to Unilever
- Ensure any personal political support or contributions do not affect their performance or objectivity at work (see the Code Policy on [Avoiding Conflicts of Interest](#))
- Ensure where employees represent Unilever in social or economic advisory groups set up by governments, their participation is subject to the prior approval of the head of communications

## Must nots

### Employees **must not:**

- Create a conflict of interest through their involvement in the type of social or economic advisory groups mentioned above. (see the Code Policy on Avoiding Conflicts of Interest)

# External Communications – The Media, Investors & Analysts



Communication with investment communities – including shareholders, brokers and analysts – and the media must be managed carefully. Such communication has important legal requirements and demands specialist skills and experience. Only individuals with specific authorisation and training/briefing may communicate about Unilever with investment communities or the media, or respond to their enquiries or questions.

Unilever's Disclosure Committee – on behalf of the Board – is responsible for ensuring Unilever has the necessary procedures to comply with relevant laws and regulations including Unilever's Disclosure & Share-Dealing Manuals.

This Code Policy outlines how communication with investment communities and the media must operate.

## Musts

Employees who have received authorisation to communicate with investment communities or the media from the Investor Relations or Media Relations functions or a Board Member **must:**

- Comply with any conditions attached to their authorisation, such as constraints on when and / or with whom they may communicate
- Always consult with the authorising functions about the content of any message before they communicate

Employees who are part of the Investor Relations or Media Relations teams must follow Unilever's [Share Dealing](#) and [Disclosure](#) Manuals and the departmental processes and procedures (including authorisations) in this area

The above rules also apply outside formal work settings, such as at external speaking engagements, courses, seminars, trade association events or social occasions.

## Must nots

Employees who are not part of the Investor Relations or Media Relations functions or a Board Member **must not:**

- Communicate with investment communities or the media, either on or off the record, without authorisation from one of these functions and appropriate training/briefing
- Respond to enquiries from investment communities or the media: all enquiries must be directed to the Media Relations or Investor Relations functions
- Get drawn into conversations, answer any questions or provide any information or opinion
- Make any forward-looking financial statements or provide 'inside information' (see the Code Policy on [Preventing Insider Trading](#) and the Media Relations Protocol)

# Glossary



The Code  
of Business  
Principles

Countering  
Corruption

Respecting  
People

Safeguarding  
Information

Engaging  
Externally

Glossary

# Glossary

## Code Support Line

Confidential online and telephone service, allowing the user to raise a concern about an actual or potential breach of the Code or Code Policies, to ask a question if clarification is needed and to check back on the status of a concern raised or a question asked. The service is available at [www.unilevercodesupportline.com](http://www.unilevercodesupportline.com)

## Competitor's confidential information

Non-public information about a competitor's product or the way in which a competitor carries out its business. Confidential information covers a broad sweep of activities, including current or future prices; pricing terms (e.g. discounts); buying prices, costs and supplier information business or financial strategies and plans (e.g. mergers, acquisitions and divestments); marketing, promotional and sales plans; financial results before any formal announcement; R&D work (strategies, designs, formulae, drawings, technical information, manuals and instructions, product specifications and samples of products that have not been launched or revealed publicly); and proprietary software.

## Employee

A person employed by Unilever under one of a variety of contracts. The term covers all employees, whether full-time, part-time, fixed-term, permanent or trainees.

Additionally, in this document, the term is used to cover other persons working for Unilever as follows: those with a statutory Director role or equivalent responsibilities; Unilever employees of joint ventures; and employees of new acquisitions.

## Facilitation payment

Unofficial payment – in effect a bribe – made to a public official to secure or speed up the performance of a routine action that the official is required to provide anyway. Facilitation payments are illegal in most countries, although a small number provide exceptions in certain circumstances. Also referred to as a 'facilitating', 'speed' or 'grease' payment.

## Family member

A relative, by blood or by marriage (or similar informal relationship), notably a spouse, live-in partner, parent or child. The term includes sibling, step- or adopted child, step-parent, grandparent, uncle, aunt, cousin, grandchild or any relative who has lived with you for the past 12 months or more.

## Improper advantages

The offer or gift of anything of any value, including nominal cash amounts, which may be perceived as intended to cause the recipient to behave contrary to customary ethical expectations. Includes money, services (including favours), discounts, use of resources, loans, credit, the promise of future advantages (including future employment or internships), and gifts or hospitality.

## Public official

An officer, employee or representative of a State or a State controlled or owned entity. Term includes a person representing a political party or public international organisation, members of royal families or a candidate for political, municipal or judicial office. Also covers anyone acting in an official capacity on behalf of any of the above, including the police and armed forces.

## Unilever

The expressions 'Unilever' and 'Unilever companies' are used for convenience and mean the Unilever Group of companies comprising Unilever PLC and its respective subsidiary companies. The Board of Unilever means the Directors of Unilever PLC.