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 Cluster 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 anvone 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 Cluster 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).



