



Policy Area:	Environmental Care
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Unilever Framework Standards - Environmental Care

The following document details the Unilever SHE Framework Standards which relate to Environmental Care Management. These Unilever SHE Framework Standards are applicable to all organisations¹ within Unilever. Taken together, they describe an environmental care management system.

Unilever SHE Standards which are more limited in scope i.e. those which apply to a particular type of organisation e.g. Foods or HPC, or deal with a specific risk or issue of general governance have been published separately as Unilever SHE Specific Standards.

The Unilever SHE Framework Standards and Specific SHE Standards are mandatory.

Environmental Policy

Environmental policy

All Unilever organisations must prepare and document an appropriate environmental policy², which is consistent with the Unilever environmental policy.

The policy must include:

- a clear statement of overall environmental objectives,
- a commitment to the prevention of pollution and maintenance of the Zero Non Hazardous Waste to Landfill Status,
- a commitment to continuous improvement,
- a commitment to compliance with all applicable legislation and internal Unilever standards e.g. Corporate SHE database, Business Group, Category and Operating Company.

The policy must be authorised and signed by the most senior person within the organisation.

The policy must be communicated across the whole organisation to ensure that all individuals³ working for the organisation are aware of their individual and collective rights and responsibilities.

¹ The word "Organisation" means all Unilever/Regional/Sub Regional Corporate Head Offices, Operating Company Head Offices, Marketing & Sales Organisations, Sourcing Units, Plantations, Research Development Centres, Warehouses and Distribution Centres. The word "organisation" as used within the Unilever SHE Frameworks Standards does not apply to non-Unilever operations e.g. third party makers/co-packers. A Unilever Specific SHE Standard which relate to Third Party Operations has been published separately.

² It is anticipated that many organisations will simply choose to adapt the Unilever environmental policy statement.

³ While the term "individuals working for the organisation" includes employees, temporary employees, contractors and sub contractors, Unilever's primary duty of care applies to its own staff. Arrangements for

The policy must be reviewed annually and where necessary revised to ensure that it remains relevant and appropriate to the organisation.

Planning

Significant environmental aspects

Each organisation must identify and evaluate the environmental aspects⁴ of its products, operations, activities or services to determine those which have or which could have a significant impact on the environment.

Each organisation must ensure that its significant environmental aspects are considered when setting its environmental objectives.

Significant environmental aspects must be documented and then kept under periodic review.

The evaluation of significant environmental aspects must form an integral part of the organisation's development and management of change processes.

When reviewing the progress of environmental aspects, it is important that both environmental condition⁵ and environmental performance⁶ are considered.

Legal and other requirements

Each organisation must undertake a regular review to identify all applicable environmental legislation and all applicable internal Unilever standards e.g. Business Group, Category and Operating Company.

Each organisation must develop a plan which will ensure full compliance with internal Unilever standards⁷ within a reasonable and defined timescale, agreed with its parent organisation, e.g. Business Group.

other individuals must be proportionate. Unilever organisations must not take on responsibilities which primarily lie with other organisations or individuals

⁴ *An environmental aspect is defined as an element of an organisation's products, operations, activities or services that can interact with the environment.*

⁵ *Environmental condition is the state or characteristic of the environment as determined at a certain point in time*

⁶ *Environmental performance has a measurable result, can be measured against an organisation's policy*

⁷ *In the case of the Zero Non Hazardous Waste to Landfill requirement the following scenarios apply:*

1. *A site having 1 main contractor managing all waste*

The site is expected to audit the waste contractor on a regular basis; this can be done via requesting documentation and proof of traceability for how our waste has been handled and/or destroyed; when requesting information, the site should focus on high risk waste streams (e.g.: high potential of landfill); supplier audit guidelines have been developed and are available on the Sustainability portal.

All organisations must operate in compliance with applicable legislation, unless a specific exemption or exemption period has been previously agreed with the relevant enforcement authority.

Objectives and targets

Each organisation must establish, document and maintain a set of specific environmental objectives and targets, relevant to its current significant environmental aspects and consistent with its environmental policy.

Environmental management programme

Each organisation must establish and maintain a written management programme (*improvement plan*) for achieving its objectives and targets. The means, responsibilities and time-scales for achieving the organisation's objectives and targets must be clearly defined and adequate resources provided.

The management programme must be reviewed at regular and planned intervals and revised as appropriate to reflect changing circumstances.

2. *A site having many contractors managing waste*

The site is expected to have a documented risk assessment on how to maintain the Zero Non-Hazardous Waste to Landfill status; this should generate an audit schedule where priority is given to high risk waste streams; supplier audit guidelines have been developed and are available on the Sustainability portal.

Certifications from 3rd party auditors would be considered as sufficient proof of risk management.

Regular is defined as having a frequency of at least once every 3 years. If red flags are raised during an audit, the frequency should be raised until the site feels comfortable that the issue has been closed.

In case of high-risk waste streams or geographies, the site is expected to consider whether physical audits of waste contractors are necessary to manage risks.

For further help on the subject, refer to the "Guidance for the Application for Zero Non-Hazardous Waste to Landfill".

Implementation and Operation

Structure and responsibility

Within each organisation, the most senior person is responsible⁸ and accountable⁹ for the implementation and performance of the organisation's environmental management system.

The most senior person in the organisation must ensure that they are regularly briefed on the development of the organisation's environmental programme, overall environmental performance and any serious environmental issues and/or incidents.

Each organisation must nominate a competent person(s) to co-ordinate the overall implementation of the organisation's environmental management system. This person must have access to the most senior person within the organisation.

Each organisation must define, document and communicate individual roles, responsibilities and authorities for the implementation, control and improvement of the environmental management system and provide adequate resources.

Each organisation must establish access to a source of competent expert advice on environmental care matters.

Training, awareness and competence

Within each organisation, all individuals working for that organisation must be given relevant environmental care training or information, as appropriate. This training or information must be proportionate to the individual's environmental care responsibilities, abilities, literacy and the environmental aspects associated with their work, including emergency preparedness.

Specific individual or group training needs must be periodically assessed to ensure that each individual or group is competent to perform their role within the organisation's environmental management system.

This training must make clear the importance of effective environmental management to Unilever as a global company.

Communication

Each organisation must periodically provide environmental information, as requested by Unilever, by its parent organisation e.g. Business Group, or where legally required to do so e.g. by an external authority.

⁸ Responsibility: Can be delegated. Responsibility may lie with any competent person(s) within the organisation.

⁹ Accountability: Cannot be delegated. Accountability remains with the most senior person in the organisation

Each organisation must have a system in place for receiving, documenting and responding to relevant communication from external interested parties.

Documented Information

Each organisation must establish and maintain an information system, which:

- describes the core elements of the management system and their interaction
- provides direction to related documented information (defined as - information required to be controlled and maintained by an organisation and the medium on which it is contained. It may be from any format and media, and from any source)
- Records of results achieved

Document and data control

Each organisation must establish and maintain systems for the management of all statutory and other critical documents and data relating to its environmental management system.

Operational control

Each organisation must identify those operations and activities that are associated with its significant environmental aspects, where control measures need to be applied.

Each organisation must plan these activities to ensure that they are carried out under specified conditions by establishing and maintaining:

- documented procedures and/or work instructions to cover situations where their absence could lead to deviations from the environmental policy or objectives and targets
- specific operating criteria in the procedures, where appropriate
- systems for the purchase and/or use of substances, goods, equipment and services and their identified environmental aspects
- systems for the design and maintenance of:
 - the work organisation
 - the workplace
 - process installations
 - equipment
 - operating procedures, including their adaptation to human capabilities

Any monitoring equipment used must be calibrated, maintained and records of the calibration results and any equipment maintenance retained.

Emergency preparedness and response

Each organisation must periodically identify and evaluate the environmental aspects arising from its operations, activities and services to determine the potential for serious incidents or emergency situations.

Each organisation must establish comprehensive emergency plans to prevent or at least mitigate the likely consequences associated with each potentially serious incident or emergency situation.

Emergency plans must be documented and then kept under periodic review.

Where practicable (possible), each organisation must periodically practise their environmental care emergency plans.

Checking and Corrective Action

Performance measurement and monitoring

Each organisation must establish and maintain systems to monitor and measure its environmental performance and condition on a regular basis.

These systems must provide for the measurement of:

- the key parameters of its operations and activities that can have a significant potential impact on the environment,
- progress in the implementation of agreed objectives and targets,
- compliance with procedures, work instructions and defined operating criteria,
- compliance with applicable legislation,
- compliance with applicable internal Unilever standards.

The recording of this data must be sufficient to enable the identification of appropriate corrective and preventive action.

Incidents, non-conformance and corrective and preventive action

Each organisation must establish and maintain systems for:

- reporting and investigating non-conformances,¹⁰ including those which arise from environmental incidents,
- the reporting of serious incidents to Unilever,
- taking action to mitigate any consequences arising from such events,
- reviewing and dealing with the causes of any non-conformities,
- the initiation and completion of corrective and preventive actions,
- confirmation of the effectiveness of corrective and preventive actions taken.

Any corrective and/or preventive actions taken must be appropriate to the magnitude of the problem and commensurate with the significance of environmental aspects identified.

Records and record management

Each organisation must establish and maintain a system for the identification, maintenance, storage and retrieval of environmental records, including the results of audits, performance and management system reviews.

¹⁰ The word "Non conformance" as used in this document is defined to mean any deviation from procedures, work instructions, operating criteria, applicable legislation or internal Unilever standards etc., that could either directly or indirectly result in a significant impact on the environment.

Where required by national legislation records must be retained for the specified period, or at least three years.

Environmental care management system audits

Where required by its parent organisation, each organisation must ensure that its environmental care management system is subjected to an independent audit¹¹, in order to determine whether or not the organisations environmental care management system:

- conforms to planned arrangements for environmental care management, including compliance with internal Unilever standards
- has been properly implemented and maintained,
- is effective in meeting the organisation's policy and objectives,

The key recommendations arising from these audits must be presented to the organisation's top management.

The organisation's management programme must then be extended to include the actions arising from the audit recommendations.

The time period between independent environmental care management system audits must be related to the degree of perceived business risk but must be no greater than every three years.

¹¹ An "independent environmental audit" is one undertaken by someone from outside the specific organisation being audited. Alternatively, personnel who work for the organisation can undertake an environmental audit, but in these circumstances the audits must then be verified by someone from outside that specific organisation.

Management Review

Management review

Each organisation's top management team must, at least annually, review the performance and consider the adequacy of its environmental care management system to ensure its continuing suitability, adequacy and effectiveness.

The management review should be done as part of the organisation's overall management of change process. The management review must address the possible need for changes to policy, objectives and other elements of the environmental management system in the light of management system audits, changing circumstances and the commitment to continuous improvement.