

**KnowTheChain Food & Beverage Benchmark Methodology
Version 2 (December 2017)**

SCORED DISCLOSURE

Additional information provided by Unilever

THEME 1 COMMITMENT AND GOVERNANCE

1.1 Commitment

The company:

(1) has publicly demonstrated its commitment to addressing human trafficking and forced labor.

- 2018 Human Trafficking Statement: https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf

- pages 32-37 of our 2017 Human Rights Report https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

- p.2 of Human Rights Policy Statement https://www.unilever.com/Images/unilever-human-rights-policy-statement_tcm244-422954_en.pdf

1.2 Supply Chain Standards

The company's supply chain standard:

(1) requires suppliers to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor;

(2) has been approved by a senior executive;

(3) is easily accessible from the company's website;

The RSP is available in 14 different languages from this webpage:

<https://www.unilever.com/sustainable-living/enhancing-livelihoods/fairness-in-the-workplace/advancing-human-rights-with-suppliers-and-business-partners/>

(4) is updated regularly, following internal review and input from external stakeholders; and

Page 73 of our 2017 Human Rights Report details our engagement with our suppliers on reviewing and updating the RSP: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(5) is communicated to the company's suppliers.

We send suppliers the RSP and ask them to review it and make a declaration on behalf of the organisation to demonstrate their commitment to this policy. Please see p.82 of our 2017 Human Rights Report for more info https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

1.3 Management and Accountability

The company:

(1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies and standards that addresses human trafficking and forced labor; and

Page 13 of our 2017 Human Rights Report explains how this work is overseen at Unilever: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(2) has tasked a board member or board committee with oversight of its supply chain policies and standards that address human trafficking and forced labor.

N.B In your answer, you state the “Global Vice President for Social Impact”. Please note the job title is now “Global Vice President for Integrated Social Sustainability”.

Our two modern slavery statements are endorsed by our CEO and approved by both our English and Dutch boards: see page 9 of both the 2017 and 2018 statement <https://www.unilever.com/about/UK-Modern-Slavery-Act-Transparency-Statement.html>

1.4 Training

The company undertakes programs which include:

(1) the training of all relevant decision-makers within the company on risks, policies, and standards related to human trafficking and forced labor; and

Please also see our 2018 Modern Slavery Statement https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf

(2) the training and capacity-building of suppliers on risks, policies, and standards related to human trafficking and forced labor, covering key supply chain contexts.

1.5 Stakeholder Engagement

In the last three years, the company has engaged relevant stakeholders by:

(1) providing at least two examples of engagements on forced labor and human trafficking with policy makers, worker rights organisations, local NGOs, or other relevant stakeholders in countries in which its suppliers operate, covering different supply chain contexts; and

Please see page 4 of our 2018 Modern Slavery Statement “In June 2017, our Global Vice President of Integrated Social Sustainability attended a forum specifically on the human rights risks associated with the recruitment of migrant workers. Held in Berlin, it was hosted by the IHRB, the Leadership Group for Responsible Recruitment and Humanity United, bringing together over 120 international experts from across global brands, suppliers, recruitment agencies, government and civil society representatives”. https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf and also see <https://www.ihrb.org/programmes/migrant-workers/meeting-report-annual-leadership-forum-for-responsible-recruitment>

Our Global Vice President of Integrated Social Sustainability is a member of the UK Home Office Business Against Slavery Forum and the Foreign Secretary’s Advisory Group on Human Rights <https://www.gov.uk/government/publications/the-foreign-secretarys-advisory-group-on-human-rights/the-foreign-secretarys-advisory-group-on-human-rights>

We signed up to the Evening Standard's think tank to help end modern slavery

<https://www.standard.co.uk/news/modern-slavery/leading-businesses-sign-up-to-help-end-the-scandal-of-modern-slavery-after-evening-standards-call-to-a3700861.html>

Page 33 of our 2017 Human Rights Report gives information on the 'Tackling Modern Slavery' event that we organised in 2017 at our London head office and also the OSCE conference in Berlin in 2016: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

Our Global Vice President took part in the opening plenary of the 2017 United Nations Forum on Business and Human Rights in Geneva in November 2017:

<https://www.ohchr.org/EN/Issues/Business/Forum/Pages/2017VideoClips.aspx>

(2) actively participating in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.

We used to sponsor – until 2018 – the CGF Social Sustainability Committee (SSC) at Board Level by our CEO Paul Polman. The CGF SSC is now co-chaired by our Chief Sustainability Office, and our Global VP for Integrated Social Sustainability also sits on the committee.

THEME 2 TRACEABILITY AND RISK ASSESSMENT

2.1 Traceability

The company discloses:

(1) the names and addresses of its first-tier suppliers;

We provide a supply chain spend analysis which shows the location of our first tier suppliers and broken down by spend category. https://www.unilever.com/Images/unilever-supply-chain-overview---may-2018_tcm244-523172_1_en.pdf

We were the first major consumer goods company to publish our supplier and mill data: we have now identified around 1,400 of the palm oil mills in our 'mill universe'.

Our suppliers are named here https://www.unilever.com/Images/unilever-palm-oil-supplier-list_tcm244-515896_en.pdf and our mills are listed here along with parent company names, and location information (Country, province, district, latitude, longitude)

https://www.unilever.com/Images/unilever-palm-oil-mill-list_tcm244-515895_en.pdf

Please see here: <https://www.unilever.com/about/suppliers-centre/working-together/partner-to-win/index.html> -

Symrise: <https://www.unilever.com/news/Press-releases/2014/14-01-29-Unilever-Symrise-and-GIZ-join-forces-to-support-vanilla-farmers.html>

Barry Callebaut and 2 others here: <https://www.unilever.com/about/suppliers-centre/sustainable-sourcing-suppliers/index.html>

(2) the countries of below first-tier suppliers (this does not include raw material suppliers);

(3) the sourcing countries of raw materials at high risk of forced labor and human trafficking; and

Pages 78-79 of our 2017 Human Rights Report show the supplier countries with highest audit findings of forced labour

We undertook supplier training events in Turkey, Dubai, India, Bangkok and Malaysia as high risk countries for forced labour – see p.32 of our 2017 Human Rights Report
https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

The following are sourcing countries of 3 raw materials at high risk of forced labour:

- Indonesia: Palm oil <https://www.unilever.com/sustainable-living/reducing-environmental-impact/sustainable-sourcing/transforming-the-palm-oil-industry/>

- India: Salt – see page 61 of our 2017 human rights report
https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

- Ivory Coast – Cocoa <https://www.unilever.com/news/news-and-features/Feature-article/2013/Inclusive-training-for-cocoa-farmers.html>

(4) some information on its suppliers' workforce.

2.2 Risk Assessment

The company discloses:

(1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks or assessments that focus specifically on forced labor risks; and

Please see page 40 of our 2017 Human Rights Report which details information on our increased focus on the terms and conditions under which temporary workers are hired and how we focus on migrant labour as we know they are particularly vulnerable
https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

Please see this quote from page 4 of our 2018 Modern Slavery Statement: “Migrant workers are an integral part of the global business yet the abusive use of migrant labour is prominent in many sectors. Businesses must come together and drive practices that empower rather than penalise the most vulnerable.” And also page 8 which describes the Integrated Social Sustainability Dashboard and risk identification process to focus on the identification of forced labour:
https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf

(2) details on forced labor risks identified in different tiers of its supply chain.

THEME 3: PURCHASING PRACTICES

3.1 Purchasing Practices

Purchasing practices and pricing may both positively impact labor standards in the company's supply chain, and increase risks of forced labor and human trafficking. The company:

(1) is taking steps towards responsible raw materials sourcing;

Please see this part of our website which gives information on “Our sustainable agriculture programme” <https://www.unilever.com/sustainable-living/reducing-environmental-impact/sustainable-sourcing/our-approach-to-sustainable-sourcing/our-sustainable-agriculture-programme/index.html> From here you will find our Sustainable Agriculture Code (SAC) which gives

us, and our farmers and suppliers, a set of rigorous standards which would spur on improvements across our supply chain. https://www.unilever.com/Images/sustainable-agriculture-code--sac---2017_tcm244-515371_1_en.pdf

Our commitment and our performance against Sustainable Sourcing can be found on this page: <https://www.unilever.com/sustainable-living/reducing-environmental-impact/sustainable-sourcing/> “By 2020 we will source 100% of our agricultural raw materials sustainably.”

(2) is adopting responsible purchasing practices in the first tier of its supply chain; and

Certification can bring many social, environmental and economic benefits. For farmers, this means they can sell their produce at a premium price, thereby increasing their income and improving their livelihoods. And, for Unilever, it helps to secure more sustainable crops for our products with the inclusion of smallholder farmers in our supply chain. See: <https://www.unilever.com/news/news-and-features/Feature-article/2017/how-supporting-independent-palm-oil-farmers-will-have-a-big-impact-on-deforestation.html>

Please also see this article about a cooperative of independent smallholders who achieved RSPO certification in Kalimantan: <https://www.unilever.com/news/news-and-features/Feature-article/2018/meet-three-experts-involved-in-a-milestone-palm-oil-project.html>

Please see the “Tea: where we began” section of this website: <https://www.unilever.com/sustainable-living/enhancing-livelihoods/inclusive-business/connecting-with-smallholder-farmers-to-enhance-livelihoods/>

Please see this webpage for information on “Sustainable cocoa and sugar”:
<https://www.unilever.com/sustainable-living/reducing-environmental-impact/sustainable-sourcing/our-approach-to-sustainable-sourcing/sustainable-cocoa-and-sugar/index.html>

Please see this page on Unilever.com which states "Few of the farmers and smallholders in our agricultural supply chain sell directly to us – we generally buy from suppliers, who buy from the farmers. As a result, we've developed an approach that enables us to reach women farmers through:

<https://www.unilever.com/sustainable-living/enhancing-livelihoods/opportunities-for-women/enhancing-womens-access-to-training-skills/>

- Financial support for farmer training programmes delivered by suppliers and NGOs
- Premium prices for suppliers that invest in farmer training and provide quality planting material, such as high-yield seeds"

(3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts).

Please refer to pages 18-19 and 73-75 of our 2017 Human Rights Report, which gives info on our Responsible Sourcing Policy: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

Alignment with the RSP in itself creates a preferred supplier list, and the incentive to suppliers for doing this is to be able to become a Unilever supplier. No business is given to a supplier that doesn't adhere to the RSP. Our Partner to Win suppliers must focus on five core areas, one of which is “Responsible and Sustainable Living” <https://www.unilever.com/about/suppliers-centre/working-together/partner-to-win/>

3.2 Supplier Selection

The company:

(1) assesses risks of forced labor at potential suppliers prior to entering into any contracts with them.

All suppliers are required to commit to the fundamental principles of Unilever’s Responsible Sourcing Policy (RSP) both when signing new contracts with Unilever, and through registration and self-assessment in the Unilever Supplier Qualification System (USQS). USQS uses a risk assessment that includes forced labour risks as one of the variables (this risk data is compiled from an external third party, Verisk Maplecroft). Suppliers representing a higher risk are required to undergo an independent third-party audit to verify their registration. The audits will include review of forced labour and human trafficking indicators. <https://www.unilever.com/about/suppliers-centre/unilever-supplier-qualification-system/>

All our of our suppliers – in order to be a Unilever supplier – MUST adhere to our RSP.

3.3 Integration into Supplier Contracts

The company:

(1) integrates supply chain standards addressing forced labor and human trafficking into supplier contracts.

All of our Tier 1 suppliers are asked to complete a self-declaration regarding their compliance to the Mandatory Requirements of the RSP. This webpage gives more information <https://www.unilever.com/sustainable-living/enhancing-livelihoods/fairness-in-the-workplace/advancing-human-rights-with-suppliers-and-business-partners/>

Successful registration in USQS enables suppliers to be qualified to work with Unilever, be that a new supplier to the business or an existing supplier who wishes to continue working with Unilever: <https://www.unilever.com/about/suppliers-centre/unilever-supplier-qualification-system/>

3.4 Cascading Standards through the Supply Chain

The company:

(1) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in-line with the company's supply chain standards addressing forced labor and human trafficking.

Yes - Page 3 of this document talks particularly about “the subsequent cascading of the same principles throughout your supply chain will require a commitment to the vision of social responsibility.” https://www.unilever.com/Images/slp-unilever-responsible-sourcing-policy-2014_tcm244-409819_en.pdf

THEME 4: RECRUITMENT

4.1 Recruitment Approach

(1) has a policy that requires direct employment in its supply chain;

Page 19 of our RSP, 4.5 (Advancing to Good Practice) says “to the extent possible, workers are hired directly..” This is not for ‘advanced suppliers’ as per your answer, but this is the level that we expect all of our suppliers to progress to – i.e. how to move their organisation up the continuous improvement ladder. https://www.unilever.com/Images/responsible-sourcing-policy-interactive-final_tcm244-504736_en.pdf

(2) requires employment and recruitment agencies in its supply chain to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor; and

We are committed to the removal of fees in our extended supply chain and should we discover fees had been paid, we would discuss remediation with the supplier. See Principle 1 of the Dhaka Principles https://www.ihrb.org/uploads/member-uploads/IHRB%2C_Migration_with_Dignity_-_Implementing_the_Dhaka_Principles.pdf (p.16) of which we are a supporter (see p.7 of https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2017_tcm244-498073_en.pdf)

Employment and recruitment agencies are our suppliers and as such are bound by the requirements of the RSP including the fundamental principles relating to forced labour. All our suppliers are bound by the RSP. Page 3 of this document talks particularly about “the subsequent cascading of the same principles throughout your supply chain will require a commitment to the vision of social responsibility.” https://www.unilever.com/Images/slp-unilever-responsible-sourcing-policy-2014_tcm244-409819_en.pdf

See also page 4 of our 2018 Modern Slavery Statement relating to third party labour agencies https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf

(3) discloses information on the recruitment agencies used by its suppliers.

We know that our suppliers in Malaysia and Dubai for example use recruitment agencies which is why we carried out supplier training there – see page 32 of our human rights progress report https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

4.2 Recruitment Fees

The company:

(1) requires that no worker in its supply chain pay for a job—the costs of recruitment should be borne not by the worker but by the employer ("Employer Pays Principle"); and

(2) takes steps to ensure that such fees are reimbursed to the workers, in the event that it discovers that fees have been paid by workers in its supply chain.

We are committed to the removal of fees in our extended supply chain and should we discover fees had been paid, we would discuss remediation with the supplier. See Principle 1 of the Dhaka Principles https://www.ihrb.org/uploads/member-uploads/IHRB%2C_Migration_with_Dignity_-_Implementing_the_Dhaka_Principles.pdf (p.16) of which we are a supporter (see p.7 of

https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2017_tcm244-498073_en.pdf)

p.19 of our RSP (point 4.4) says “Workers should not be required to pay a fee in connection with obtaining employment (including migrant workers or recruited workers supplied through an agency). Suppliers should be responsible for payment of all fees and expenses.”

https://www.unilever.com/Images/responsible-sourcing-policy-interactive-final_tcm244-504736_en.pdf

4.3 Monitoring and Ethical Recruitment

The company:

(1) takes steps to ensure employment and/or recruitment agencies used in its supply chain are monitored to assess and address risks of forced labor and human trafficking; and

Please see page 4 of our 2018 Modern Slavery Statement relating to contract labour a third party labour agencies https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf

p.37 of our Report says “In those regions at highest risk we asked our auditors to focus on the identification of forced labour.” https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(2) provides details of how it supports ethical recruitment in its supply chain.

We co-sponsored workshops organised by Aim Progress in Dubai, Malaysia and India which specifically called out ethical recruitment. <https://aim-progress.com/dubai-uae> and <https://aim-progress.com/kuala-lumpur-malaysia> and <https://aim-progress.com/gurgaon-india-3>

The Consumer Goods Forum organised a supplier training event in Bangkok in September 2017 on the following topics: What the CGF Priority Industry Principles mean for suppliers and recruitment and workplace practices. We invited a selection of our Thai suppliers to attend. (see p.34 of our human rights report: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf)

4.4 Migrant Worker Rights

The company:

(1) takes steps to ensure migrant workers understand the terms and conditions of their recruitment and employment, and also understand their rights;

(2) takes steps to ensure its suppliers refrain from restricting workers’ movement, including through the retention of passports or other personal documents against workers' will;

(3) takes steps to ensure migrant workers are not discriminated against, and not retaliated against, when they raise grievances; and

Please see the quote by Anny Tubbs “We encourage all our employees and third parties to speak up, without fear of retaliation and in strict confidence (or anonymously if they prefer), regarding any concerns about Code issues. Encouraging people to speak up early helps us manage risk and builds

trust in our business.” from this page: <https://www.unilever.com/sustainable-living/enhancing-livelihoods/fairness-in-the-workplace/advancing-human-rights-in-our-own-operations/>

For supplier grievances, Fundamental Principle 10 (p.28) provides Mandatory Requirements for suppliers to have their own confidential grievance mechanisms guaranteeing confidentiality and prohibiting retaliation. https://www.unilever.com/Images/responsible-sourcing-policy-interactive-final_tcm244-504736_en.pdf .Over and above a supplier’s own grievance mechanisms, Unilever also provides a hotline that anyone can access to report on Responsible Sourcing issues.

(4) provides evidence of how it works with suppliers to ensure migrant workers' rights are respected.

THEME 5: WORKER VOICE

5.1 Communication of Policies

The company takes steps to ensure:

- (1) its policies and standards, which include human trafficking and forced labor, are available in the languages of its suppliers' workers; and
- (2) its human trafficking and forced labor policies and standards are communicated to workers in its supply chain.

We require our suppliers to have policies and procedures in place: see p. 19 (4.1) of our RSP states that “There are hiring policies, procedures and trained staff to ensure that workers are entering into employment freely and equally and that they are never prevented from leaving if they so wish.”

Additionally, page 3 of this document talks particularly about “the subsequent cascading of the same principles throughout your supply chain will require a commitment to the vision of social responsibility.” https://www.unilever.com/Images/slp-unilever-responsible-sourcing-policy-2014_tcm244-409819_en.pdf

5.2 Worker Voice

The company:

- (1) works with relevant stakeholders to engage with and educate workers in its supply chain on their labor rights;

Please see the following examples:

- Our work with UN Women in Assam on safety and harassment (p.42, 45 and 46 of 2017 Human Rights Report) https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

- Our work with IDH and Oxfam in Malawi on wages and livelihoods (p.28 of https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf) and also this link <http://www.ethicalteapartnership.org/project/malawi-2020-tea-revitalisation-programme/>

- (2) takes steps to ensure that there are worker-to-worker education initiatives on labor rights in its supply chain;

Freedom of Association is a Fundamental Principle of our RSP (FP8), and trade unions and other worker to worker engagements are key in improving worker knowledge and understanding of labour rights https://www.unilever.com/Images/responsible-sourcing-policy-interactive-final_tcm244-504736_en.pdf

(3) provides evidence of the positive impact of worker engagement in its supply chain; and

See the 'outcome and impact' part of p.26, and 28 for Malawi and p.42 and 46 for Assam https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

Also see the 'progress and more information' of this link for Malawi: <http://www.malawitea2020.com/>

And this one for Assam <http://www.ethicalteapartnership.org/wp-content/uploads/Supporting-Change-in-Assam-May-2018-1.pdf>

(4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.

See page 64 for a focus on our work with the ETP partnership with the Kenya Tea Development Agency (KTDA) and training on stopping discrimination and harassment.

See page 65 for a focus on the Farmer Field Schools through our membership of Malawi Tea 2020, focusing on increasing tea yields

https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

5.3 Freedom of Association

The company:

(1) describes how it works with suppliers to improve their practices in relation to freedom of association and collective bargaining;

See pages 40 – 41 of our 2017 Human Rights Report for how we work with suppliers on this area: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(2) works with local or global trade unions to support freedom of association in its supply chain;

See page 39 "We discuss rights issues in our own operations, in joint ventures, and involving our suppliers. We also focus on our key commodities such as palm oil and tea..." this palm and tea refers to our supply chain. https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(3) takes steps to ensure workplace environments in which workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association; and

See the last paragraph on page 33 of our 2015 Human Rights Report https://www.unilever.com/Images/unilever-human-rights-report-2015_tcm244-437226_en.pdf

(4) provides at least two examples covering different supply chain contexts of how it improved freedom of association for supply chain workers.

Page 40 of our 2017 report states “We ask our suppliers to ensure that their key policies on hiring, promotion and termination do not inhibit trade union membership or activity, and to ensure that legally binding collective bargaining agreements are honoured.” Also page 41 of our 2017 report gives more examples of our supplier audit findings: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

5.4 Grievance Mechanism

The company:

(1) takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company's supply chain is available to its suppliers' workers and relevant stakeholders;

It is a mandatory requirement of the RSP that all suppliers have a grievance mechanism

In addition, any supplier or their worker can report a grievance to Unilever see page 70 of Report https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf (via an independent third party provider). See here: <https://app.convercent.com/en-us/LandingPage/99b958aa-55a1-e611-80d3-000d3ab1117e>

(2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers;

p.11 (point 3) of the RSP states: “Suppliers, their employees, workers or contractors may report actual or suspected breaches of this RSP to Unilever by phone or online. Reports can be submitted confidentially and anonymously (where permitted by law). For more information, click on Raise a Concern”

Additionally, Page 3 of this document talks particularly about “the subsequent cascading of the same principles throughout your supply chain will require a commitment to the vision of social responsibility.” https://www.unilever.com/Images/slp-unilever-responsible-sourcing-policy-2014_tcm244-409819_en.pdf

(3) takes steps to ensure that workers or an independent third-party are involved in the design or performance of the mechanism, to ensure that its suppliers' workers trust the mechanism;

“We act on feedback from users of our Code breach channels in order to improve the system”: <https://www.unilever.com/about/who-we-are/our-values-and-principles/business-integrity/index.html>

(4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism; and

In 2016, we investigated and closed 606 reports received through our hotline and online reporting systems related to our Code Policy Respect, Dignity and Fair Treatment (RDFT). Of these, 218 were confirmed as breaches. In 2016, bullying, harassment and performance pressure were our highest reported salient issues under RDFT, with a high number of these reported Code Breaches coming from Latin America, North America and East Africa. See p.69 of Human Rights Report https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

Please also see the Code Cases by relevant theme in 2017 <https://www.unilever.com/about/who-we-are/our-values-and-principles/business-integrity/index.html>

(5) provides evidence that the mechanism is available and used by workers below tier one in its supply chain, or by relevant stakeholders in key supply chain contexts.

THEME 6: MONITORING

6.1 Auditing Process

The company has a supplier audit process that includes:

- (1) non-scheduled visits;
- (2) a review of relevant documents;
- (3) interviews with workers;
- (4) visits to associated production facilities and related worker housing; and

Yes, if accommodation is provided by the supplier then this is audited. Please scroll to the bottom of this page <https://www.unilever.com/sustainable-living/enhancing-livelihoods/fairness-in-the-workplace/advancing-human-rights-with-suppliers-and-business-partners/our-responsible-sourcing-policy-in-action/?1=2> and click on “URSA 2.0 – Final Checklist” to see the audit questions 9.74, 9.77 and 9.78

- (5) supplier audits below the first tier.

Yes, we do. Our SAC is relevant for both our direct suppliers (T1) and the farmers that supply them https://www.unilever.com/Images/sustainable-agriculture-code--sac---2017_tcm244-515371_1_en.pdf

6.2 Audit Disclosure

The company discloses:

- (1) the percentage of suppliers audited annually;

Please see the last page of this presentation https://www.unilever.com/Images/unilever-supply-chain-overview---may-2018_tcm244-523172_1_en.pdf

We have conducted 4,500 audits across the 11,287 suppliers that were identified as High Risk.

- (2) the percentage of unannounced audits;
- (3) the number or percentage of workers interviewed during audits;

See page 6 of this URSA guide https://www.unilever.com/Images/ursa-guide-for-indirect-suppliers-rev-apr-25-v4_tcm244-479953_en.pdf

Page 33 of the SMETA guidance shows this table that we accept as standards for interviews. <https://cdn.sedexglobal.com/wp-content/uploads/2017/04/Smeta-6.0-BPG.pdf>

- (4) information on the qualification of the auditors used; and

All of our preferred auditors (Bureau Veritas, Control Union, DNV GL, Intertek and SGS) are members of ASPCA <https://www.theapsca.org/apsca-member-firms.html>

p.37 of our Report says “In those regions at highest risk we asked our auditors to focus on the identification of forced labour.” https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(5) a summary of findings, including details regarding any violations revealed.

Please refer to the following pages in our Human Rights Progress Report where we have asked suppliers to remediate issues: 24-25; 30-31; 36-37; 40-41; 47; 50-51; 55; 58-59 (supplier snapshots and audit findings)

THEME 7: REMEDY

7.1 Corrective Action Plans

The company's corrective action plans include:

(1) potential actions taken in case of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision;

(2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, spot-checks, or other means;

Unilever uses an Aravo[®] database to manage the Unilever Supplier Qualification System (USQS) which is our compliance database. In USQS the audit results are maintained, with each non-conformance separately listed. In order for a supplier to maintain a ‘Compliant’ status in USQS, each identified non-conformance must have a corrective action plan provided and documented in USQS. The corrective action plans must be verified by the external auditor who conducted the initial audit and confirmed in both the overall audit report, but also specifically against each non-conformance in USQS. The corrective action should follow a ‘root cause analysis’ approach to identify the underlying issue and not simply the identified symptom found during the audit. Unilever’s chosen audit firms are trained on providing guidance to suppliers to ensure they are using the root-cause identification methodology.

(3) potential consequences if corrective actions are not taken; and

Unilever works with suppliers to remedy all non-conformances found through the audit process. Suppliers that do not close (verified by third-party auditor) audit non-conformances within 90 days are identified in our database and escalated for review. Where the supplier has an acceptable corrective action plan in place (whether through their own actions or after review/contribution from Unilever) a temporary dispensation may be granted to continue to supply. The corrective action must be acceptable both with respect to time and appropriateness of resolution. If a supplier is unwilling or unable to affect an acceptable resolution to a non-conformance, Unilever will affect an exit plan to cease sourcing from this supplier. See p.18 -19 of our Report: https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

(4) a summary or an example of its corrective action process in practice.

Please see the following ‘supplier snapshot’ examples on the following pages of our 2017 Human Rights Report: p.24,30,36,40,47,50,58 https://www.unilever.com/Images/human-rights-progress-report_tcm244-513973_en.pdf

7.2 Remedy Programs / Response to Allegations

A. If no allegation regarding forced labor in the company's supply chain has been identified in the last three years, the company discloses:

(1) a process for responding to the complaints and/or reported violations of policies and standards; and

Please see “How do we respond to breaches of our Code” here
<https://www.unilever.com/about/who-we-are/our-values-and-principles/business-integrity/index.html>

(2) a public response to the allegation, which covers each aspect of each allegation.

We have made all of our responses to Amnesty International now public as links on this page
<https://www.unilever.com/sustainable-living/reducing-environmental-impact/sustainable-sourcing/transforming-the-palm-oil-industry/engaging-our-palm-oil-suppliers/>

Specifically:

30th Nov 2016 https://www.unilever.com/Images/unilever-response-to-amnesty-international-report-30112016_tcm244-496177_en.pdf

26th Oct 2016 https://www.unilever.com/Images/unilever-response-to-amnesty-international---oct-2016_tcm244-522766_1_en.pdf

11th Nov 2016 https://www.unilever.com/Images/unilever-response-to-amnesty-international---nov-2016_tcm244-522765_1_en.pdf

13th April 2017 https://www.unilever.com/Images/unilever-response-to-amnesty-international---apr-2017_tcm244-522763_1_en.pdf This letter is particularly relevant to this question

26th March 2018 https://www.unilever.com/Images/unilever-response-to-amnesty-international---mar-2018_tcm244-522764_1_en.pdf

(3) outcomes of the remedy process in the case of the allegation(s).

(4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

NON-SCORED DISCLOSURE

Commitment to address forced labor in the supply chain

The company has developed measurable and time-bound commitment(s) to address forced labor in the supply chain.

Compliance with Regulatory Transparency Requirements

UK Modern Slavery Act

Where applicable, the company discloses annual statements under the Modern Slavery Act which fulfils the three minimum requirements (director signature, board approval, link on homepage).

Please update your answer to include our 2018 statement

https://www.unilever.com/Images/unilever-slavery-and-human-trafficking-statement-2018_tcm244-521391_en.pdf - which has been approved by the board (see p.2 and 9)

California Transparency in Supply Chains Act

Where applicable, the company discloses a statement under the California Transparency in Supply Chains Act which fulfils the minimum requirements (conspicuous link on homepage, reporting against five areas).

Additional information

Please note the below information may be displayed on a company's scorecard, or may be used for KnowTheChain's analysis purposes more broadly.

Business model

To put the KnowTheChain analysis into context, companies are invited to disclose relevant information on their business model, such as sourcing countries, owned versus outsourced production, etc. [Note KnowTheChain reserves the right to edit the information provided]

Addressing forced labour risks related to third-party products

Where a company--in addition to own branded products--sells third party products, the company discloses how it assesses and addresses forced labor risks related to third party products (relevant for retail companies).