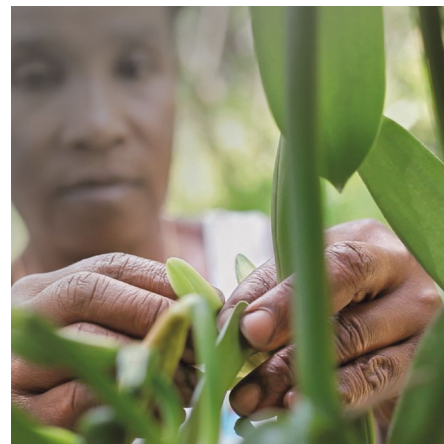


CODE OF BUSINESS PRINCIPLES AND CODE POLICIES



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THE CODE AND OUR STANDARD OF CONDUCT

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OUR FRAMEWORK

VALUES

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

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.

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.

A MESSAGE FROM PAUL POLMAN

Unilever's reputation for doing business with integrity and with respect for all those with whom it interacts goes back to the very origins of the company. Indeed, the businesses that formed Unilever were among the most enlightened of their time, improving the welfare of their workers and developing products with a positive social impact.

Our values – integrity, respect, responsibility and pioneering – provide the foundations on which to take this legacy forward. A pioneering spirit, stretching business ambitions and a drive for continuous improvements form part of Unilever's DNA, but they must always be underpinned by a commitment to operate with integrity and transparency, a respect of human rights and a responsibility for the societies and environments in which we operate. Only by integrating our values into the way we do business can we create truly sustainable growth.

I recognize that the global environment in which we operate is often challenging. Many of the countries in which we operate, for example, rank poorly in global corruption indexes. Being a global employer, proud of our culture of meritocracy and diversity, also means that we have a blend of cultural expectations and norms across the company. The rapid escalation of the digital age has created new threats and behavioural expectations relating to the safeguarding of sensitive information. Competitive pressures are ever-present. And these are just some examples.

But the greater the pressures, the greater the effort we have to make to ensure we uphold our values and our high standards of conduct globally. In this volatile, uncertain, complex and ambiguous world, protecting Unilever through the fostering of business integrity is a non-negotiable for anyone who works for our business. This expectation is embodied in Unilever's Code of Business Principles, setting out a clear standard of conduct. It is supported by Code Policies that provide a framework of simple 'musts' and 'must nots' – translating our standards into behaviours that protect Unilever and each and every one of us.

Thank you for living our values and for taking personal responsibility for creating a brighter future.

Warm regards



Paul Polman
Chief Executive Officer



THE CODE OF BUSINESS PRINCIPLES (1 of 2)

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.

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 and equal opportunity and where there is mutual trust, respect for human rights and no discrimination.

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

We are committed to safe and healthy working conditions for all employees.

We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards.

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

We are committed to working with employees to develop and enhance each individual's skills and capabilities.

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 ensure transparent, fair and confidential procedures for employees to raise concerns.

Consumers

Unilever is committed to providing 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.

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.

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.



THE CODE OF BUSINESS PRINCIPLES (2 of 2)



The Environment

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.

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.

Business Integrity

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.

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, categories, functions and operating companies. They are responsible for implementing these principles, supported by local Code 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.

Note

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

LIVING THE CODE (1 of 2)

Unilever's reputation for doing business with integrity and respect for others is an asset, as valuable as its people and its brands. 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 to adhere to business principles consistent with our own. These expectations are set out in Unilever's Responsible Sourcing Policy and Responsible Business Partner Policy, which 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:

- Employees, whether full-time, part-time, fixed-term, permanent or trainees
- Contractors, temporary staff, secondees, work-experience placements
- Persons with statutory director roles or equivalent responsibilities
- Employees of joint ventures and approved third-party labour providers where Unilever has direct management control
- Employees of new acquisitions.



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 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 (continued)

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 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;
 - Complete an annual Code acknowledgement statement;
 - Ensure that all their team members, including new joiners:
 - Have read the Code and, Code Policies or the 'Winning with Integrity' booklet
 - 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 the 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 the 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 colleague who reports a potential or actual breach;
- Discuss any potential or actual breach under investigation with other colleagues, 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 market Cluster/country boards or senior leadership teams and heads of all category, corporate and functional 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.

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.

Employees **must** 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 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;

LEGAL CONSULTATION (2 of 2)

- **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 and Intellectual Property](#));

- **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

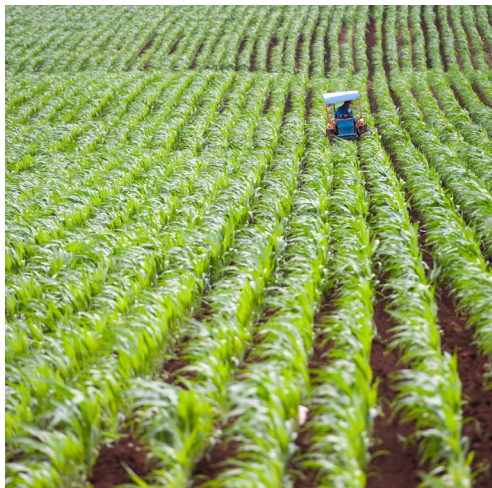
Employees **must not** do anything that Legal Group has advised is illegal and/or unlawful. Where an activity is not illegal and/or unlawful but legal advice highlights significant risks for Unilever, such as litigation, they must not proceed without express senior line management authorisation.

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.

Employees **must not** appoint a private investigator without prior approval from their General Counsel.



RESPONSIBLE RISK MANAGEMENT



Risk management is integral to Unilever's strategy and to the achievement of Unilever's long-term 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. 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, after the implementation of controls, that they are prepared to accept such that there is not a significant threat to achieving their objectives;
- Risk Mitigation: they must put adequate controls in place, and ensure that they are operational, in order to deliver their objectives.

All Vice Presidents and above **must** ensure that the risk management activities, as outlined in Unilever's Risk and Control Frameworks, are being undertaken for their areas of responsibility.

All leadership teams of **operational units must** complete an annual holistic risk discussion 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.

For those risks where significant gaps have been identified, leadership teams **must** perform regular reviews and ensure risks are mitigated as desired.

All project leaders of transformational projects **must**, together with their teams, identify the key risks associated with their project achieving its objectives. Risk mitigation plans **must** be prepared and progress reviewed with the project steering group.

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.**

IN THIS SECTION:

Avoiding Conflicts of Interest

Anti-Bribery

Gifts & Hospitality

Accurate Records, Reporting &
Accounting

Protecting Unilever's Physical & Financial
Assets & Intellectual Property

Anti-money Laundering

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. This Code Policy sets out what employees must do to avert or manage actual or perceived conflicts of interest.

Musts

Employees **must**:

- Ensure Unilever is best placed to benefit from potential business opportunities;
- Tell their line manager immediately if they believe any of their personal, financial or political activities create an actual, perceived or potential conflict of interest with their role at Unilever.

Employees must notify their line manager and Business Integrity Officer, to agree how best to manage the situation, if they have:

- A **family member** or a close personal contact who is a **public official**;
- Family members or a close personal contact working for, or providing any services to, actual or potential competitors, customers or suppliers.

Employees **must** notify their line manager and Business Integrity Officer, to agree how best to manage the situation, if they or their family members hold investments other than in publicly traded pension funds, index linked or tracker funds that represent:

- Substantial interests (5% of their net worth) in a Unilever competitor, supplier, customer or State controlled or influenced entity;
- Any interest in a supplier if they, or one of their team, are involved in selecting or assessing the supplier or negotiating with them;
- Any interest in a customer if they, or one of their team, deal with them.

Employees 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, **must** secure prior approval from their line manager and Business Integrity Officer. In addition:

- They must take steps, before accepting, to ensure the role will not create an actual, perceived or potential conflict of interest, detract from their commitment and contribution to Unilever, or take up excessive time;

- They must ensure they will not have access to commercially sensitive information concerning actual or potential Unilever competitors (see Code Policies on **Fair Competition** and **Competitors' Information and Intellectual Property**);
- They should be clear that they will keep any fees or benefits that arise from any such role, and that this reflects the fact that Unilever takes no responsibility in relation to them;
- Before becoming a director of any publicly listed company, they must also obtain written approval from the Chief Legal Officer, as well as notifying the Chief Business Integrity Officer;
- The roles of school governors, governing positions in amateur sporting or recreational groups, and directors of property/housing blocks in which an employee lives are excluded and do not require line manager or Business Integrity Officer approval.

Must nots

Employees **must not**:

- 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;
- Allow their personal, financial or political activities to affect or be perceived to affect the way they do their job at Unilever;
- Work for, or provide any services to, competitors, customers or suppliers unless they have prior written approval from their line manager and Business Integrity Officer;
- Work as a public official unless they have prior written approval from their line manager and Business Integrity Officer.



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 fines for Unilever and in personal penalties for 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. 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;

- Ensure that before employing or entering into contracts with any third parties to represent Unilever or its interests externally, relevant Unilever teams have undertaken appropriate due diligence checks to assess the third party's integrity. The outcome of such checks must be considered carefully before deciding whether to appoint the third party: employees must inform their Business Integrity Officer of any concerns.

In exceptional situations where employees cannot escape imminent threat of physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details of the demand and any payment to the 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](#)).

Must nots

Unilever 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 may, or give the impression that they may be, intended to influence decisions by Unilever about that third party.

Where an employee considers that a bribe, improper advantage or facilitation payment has been given or received, they must not conceal this or take any steps that could delay information being passed to the Business Integrity Officer and Cluster General Counsel.

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.

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](#)).

Unilever country leaders **must** ensure that save as otherwise provided in this Code Policy, gifts and hospitality either given or received do not exceed local monetary limits, as approved by the Global Code & Policy Committee (GCPC). These limits **must** be clearly and regularly communicated by them in each country and will apply equally to the offer and receipt of gifts and hospitality.

GIFTS & HOSPITALITY (2 of 2)

Gifts

- Employees **must** ensure that any gifts offered (other than Unilever branded merchandise) or received do not exceed the local monetary limits and are one-off or irregular in nature and at all times 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.
- If employees are offered a gift that exceeds the local monetary limits 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, Unilever employees must:
 - Consult their line manager and Business Integrity Officer; and
 - Where appropriate take steps for the gift to be donated to charity.
- 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;
- 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, or similar responsible activity;
- Usual business contacts from Unilever and other parties are physically present;
- Its value does not exceed the local monetary limits; and
- It remains one-off or irregular in nature.

Employees are not required to record such hospitality within their local monetary limits 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, they must:

- Check their line manager supports the proposal;
- Complete and submit the Gift and Hospitality Assessment Form to their Business Integrity Officer for prior approval; 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 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.

Employees **must not**:

- 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.

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 Finance Director/Vice President of any potential fraud, 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;
- 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;
- Unilever's Accounting Manual, reporting instructions and timetables, information standards and information definitions.

Employees involved in accounting **must** ensure that:

- Sales, profits, assets and liabilities are recorded in the correct time period;

- Assumptions that underpin accounting records are properly documented, especially those relating to provisions, journal entries and contingent liabilities, including tax.

Market Cluster/country Heads, Finance Directors and Controllers **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. This Code Policy covers the protection of physical assets/property, financial assets and intellectual property.

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

Musts

Physical assets/property

Employees **must** take care to ensure that all Unilever physical assets/property they come into contact with while working are not damaged, misused or wasted. Physical assets/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; and
- Take steps to reduce 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 and seniority as specified in local, regional and/or global financial and/or treasury authority schedules;
- Employees involved in hedging contracts or transactions must comply with the relevant Unilever Standards.

Intellectual property

Employees **must**:

- Report to Legal Group 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;

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

Must nots

Employees **must not** remove Unilever's physical assets/property from company premises without permission, or use them for inappropriate purposes.

ANTI-MONEY LAUNDERING

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, Unilever and its employees must ensure Unilever does not receive 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 being implicated in money laundering.

Musts

Employees **must** immediately notify their Cluster General Counsel if they have any suspicions about actual or potential money laundering activity.

Employees **must** look out for warning signs of money laundering, such as:

Supplier requests to:

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

Customer payments to Unilever:

- From multiple bank accounts;
- From bank accounts overseas when not a foreign customer;
- Made in cash when normally made by cheque or electronically;
- Received from other third parties;
- 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 Policy and Responsible Business Partner 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.

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.

IN THIS SECTION:

Occupational Health & Safety

Respect, Dignity & Fair Treatment

OCCUPATIONAL HEALTH & SAFETY

Unilever is committed to providing healthy and safe working conditions. 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 the occupational health and safety of their reports and third parties under their control. As a condition of our employment, we all have a duty to work safely. This Code Policy outlines our individual and shared responsibilities for health and safety.

Musts

Employees and others working for Unilever, and visitors to Unilever sites **must** work and behave safely. They **must**:

- Comply with health and safety procedures and instructions relevant to their work and/or about which they have been trained or notified;
- Help ensure that those they work with, including 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 and alert enough to do;
- Make sure they know what to do if an emergency occurs at their place of work or at a site they are visiting; and
- Promptly report to local Unilever management any actual or near miss accident or injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment, so that steps can be taken to correct, prevent or control those conditions immediately.

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

- Establish and maintain an appropriate health and safety at work management system for their site, including the appointment of committees, managers, competent experts and a system for gathering employees' concerns/input;
- Identify health and safety hazards and manage/control risks arising from the site's routine and planned operations, activities and services;

- Regularly review and comply with all applicable local health and safety legislation, including relevant mandatory Unilever requirements;
- Develop site-specific health and safety 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 Safety, Health and Environment (SHE) reporting system;
- Report all incidents, accidents and near misses in line with the Serious SHE Occurrences Standard, including thorough investigation, follow-up and communication of lessons learned;
- Maintain, communicate and test site emergency plans;
- Ensure all employees, contractors and visitors receive information and training in health and safety relevant to their roles and activities.

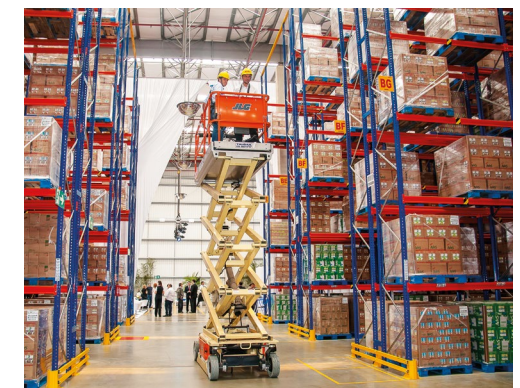
In countries where directors of the local legal company/entity must take responsibility for health and safety matters for all national sites in order to meet legal regulatory requirements, Unilever site leaders must liaise with

the relevant board of directors to agree the health and safety at work management system and the approach required to ensure appropriate ongoing review.

Must nots

Employees and others working for Unilever, and visitors to Unilever sites, **must not**:

- Undertake work or related activity, such as driving, when under the influence of alcohol or drugs, or when using medication improperly;
- Carry on with any work that becomes unsafe or unhealthy;
- Assume someone else will report a risk or concern.



RESPECT, DIGNITY & FAIR TREATMENT (1 of 2)



Business can only flourish in societies where human rights are respected, upheld and advanced. Unilever recognises that 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 Unilever and its employees must do to ensure that all workplaces maintain such an environment.

Musts

Unilever **employees must:**

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs; and
- 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 or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit.

Unilever companies **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;

RESPECT, DIGNITY & FAIR TREATMENT (2 of 2)

Musts (continued)

- Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, 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 join or not to join a legally recognised trade union, 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 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, with their line manager – or an independent manager – without fear of retaliation.

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 or political views;

- Engage in any indirect behaviour which could be construed as sexual or other harassment or bullying, such as making offensive or sexually explicit jokes or insults, displaying, emailing, texting, or otherwise distributing, offensive material or material of a sexually explicitly 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.

Unilever companies **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.

IN THIS SECTION:

[Protecting Unilever's Information](#)

[Preventing Insider Trading](#)

[Competitors' Information & Intellectual
Property](#)

[Personal Data & Privacy](#)

[Use of Information Technology](#)

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 data classification standards which define how information within Unilever must be classified, handled and protected.

Musts

When handling Unilever's information **employees must** ensure that:

- They consider the nature and classification of the information, understand the handling requirements for information and take personal responsibility for the proper use, circulation, retention, protection and disposal of Unilever's information;
- They only distribute or share Unilever's information on a need to know basis, ensuring that only Unilever employees or others working for Unilever, or authorised third parties, with a genuine business need, have access to the information;
- They take care not to disclose Unilever's information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace;
- They 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](#).

Must nots

When handling Unilever's information employees **must not**:

- Disclose Unilever's information externally to third parties unless in accordance with Unilever's data classification standards; or
- 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 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, Unilever N.V. 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 is responsible – on behalf of the Board – for ensuring that Unilever has the necessary procedures in place to ensure Unilever complies with applicable insider trading laws and regulations (see Unilever's Share Dealing and Disclosure Manuals). 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.

Musts

To check whether something is inside information, **employees must** refer to Unilever's Share Dealing and Disclosure Manuals or contact the Corporate Secretaries' Department in Rotterdam or London.

If employees suspect or know that some inside information is not being managed as inside information, they **must** immediately advise a member of the Disclosure Committee (the Corporate Secretaries' Department holds the names of committee members).

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.

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 Unilever Insider 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 and Disclosure Manuals.



COMPETITORS' INFORMATION & INTELLECTUAL PROPERTY

Unilever respects the intellectual property and confidential information of third parties, including competitors, suppliers and customers. Confidential information is information about another company that is not in the public domain and has value.



To promote fair competition, Unilever gathers and uses competitors' information that is in the public domain, for example, from newspapers, the internet and company filings. Accepting or using competitors' 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.

This Code Policy outlines what employees must do to respect the confidentiality of other companies' information.

Musts

Employees must:

- Check the latest internal training and guidance to understand what are legitimate sources of data;
- Only gather and use competitors' information that is known to be legitimate;
- 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:

- Knowingly infringe the valid patents, design rights, trademarks, copyright and other intellectual property rights of any third party;
- Seek to obtain competitors' confidential information.

Where employees acquire a competitor's confidential information unintentionally, they **must not** use it or forward it to anyone except their Legal business partner.



PERSONAL DATA & PRIVACY



Unilever respects the privacy of all individuals and the confidentiality of any personal data Unilever holds about them. 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** ensure that:

- They obtain from the individual the level of consent required by local laws, including where personal data is obtained from third parties;
- They only collect data that is adequate, relevant and used solely for the purpose for which it is collected;
- They use personal data in accordance with the relevant published Privacy Notice as may be required by local law;
- They keep personal data up to date: inaccurate data must be corrected and records of any changes must be maintained;
- They keep personal data confidential and secure with paper copies also stored securely.

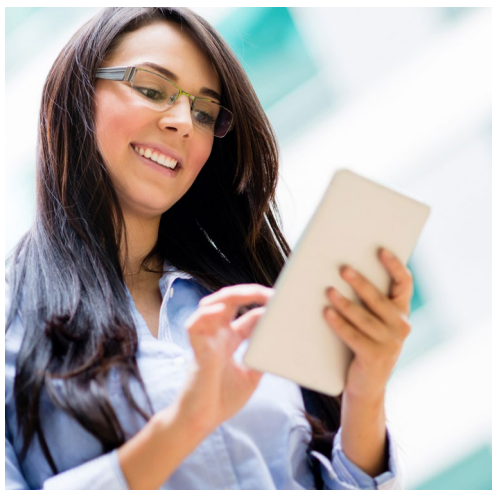
Must nots

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 (including data retention or national security laws);
- Share it, internally or externally, unless this is relevant to the purpose for which personal data is collected (see the Code Policy on [Protecting Unilever's Information](#)). The individual must be made aware of any third-party access to the data which may include access from a location outside the country in which the personal data is collected;
- Transfer data outside the country in which it is collected, even within Unilever, without advice from their Legal business partner, as there may be legal restrictions/requirements relating to the transfer (e.g. prior explicit consent may be required).

Unilever may, to the extent permitted by law, log, monitor, record, inspect and/or remove material to comply with legitimate requests to disclose such material to local law enforcement, regulatory agencies or judicial authorities.

USE OF INFORMATION TECHNOLOGY



Unilever's Information Technology (IT) – including desktops and laptops, mobile devices, networks, software, email, data, business applications and internet/intranet – are critical to our operations. This Code Policy explains what employees need to do to ensure the responsible and secure use of IT in Unilever, including compliance with all relevant laws and regulations.

Musts

Employees **must** ensure the responsible and secure use of IT in Unilever, applying the same personal and professional standards as for any other business activity when using the internet, intranet, social media, messaging and email.

When using Unilever's IT, employees **must** ensure that:

- They only use credentials allocated to them;
- They keep passwords confidential;
- They only use Unilever approved or provided hardware, software and other IT services (this may include personally owned devices as specifically authorised);
- They ensure any additional software or storage is approved and appropriately licensed;
- They obtain express permission from any employee before posting or publishing personal information about them (see the Code Policy on [Personal Data and Privacy](#));

- When using social media, they are clear about whether they are acting in a personal or professional capacity (see the Code Policy on [Protecting Unilever's Information](#) and the Unilever Social Media Standard);
- They immediately report any suspected or confirmed misuse of Unilever's IT through correct internal channels.

Must nots

When using Unilever's IT employees **must not**:

- Try to disable, defeat or circumvent standard security features;
- Access, store, send, post or publish material that is pornographic, sexually explicit, indecent or obscene, or that promotes violence, hatred, terrorism or intolerance;
- Defame, slander or lower the reputation of any person or entity or their goods or services;
- Delete, destroy or modify existing systems, programmes, information or data without appropriate authorisation;

- Upload or transfer outside Unilever any application or data licensed to the company and/or for which Unilever owns the copyright (see the Code Policy on Protecting Unilever's Information).

Employees may use Unilever's IT systems including emails and internet for personal use, as long as use is reasonable and kept to a minimum and does not cause material impact to Unilever. Any employee's information or other material, either work-related or 'personal', held electronically on Unilever equipment is not private.

Unilever may, to the extent permitted by law, log, monitor, record, inspect and/or remove material to comply with legitimate requests to disclose such material to local law enforcement, regulatory agencies or judicial authorities.

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.

IN THIS SECTION:

Responsible Innovation

Responsible Marketing

Product Quality

Responsible Sourcing

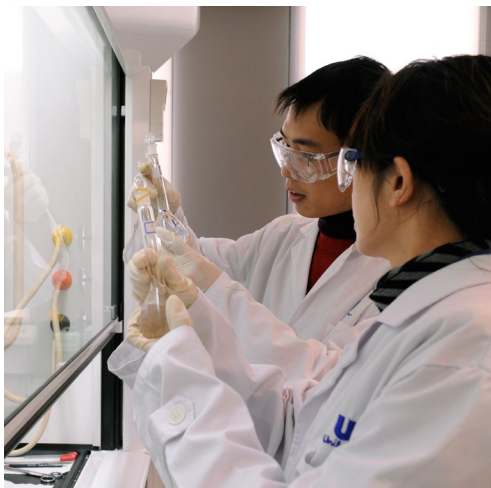
Fair Competition

Contact with Government,
Regulators & Non-governmental
Organisations (NGOs)

Political Activities & Political
Donations

External Communications –
The Media, Investors & Analysts

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 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.



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.

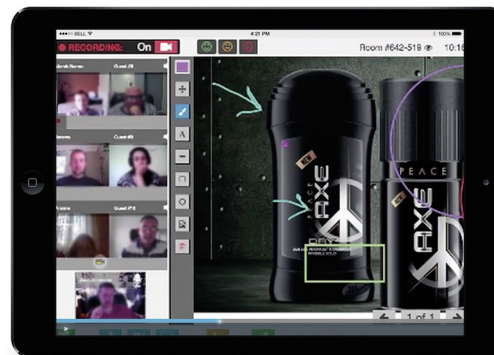
This Code Policy sets out global minimum standards that apply to all of Unilever's marketing activities everywhere. This covers but is not limited to: brand names, packaging and labelling; consumer planning and market research; trade advertising; sales materials; brand merchandising and sponsorship; 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

Integrity, responsibility and transparency

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.

PRODUCT QUALITY



Unilever's reputation is founded on delighting our consumers and customers with consistently great product quality that meets or exceeds their needs and expectations. Our aim is to be the most trusted and preferred customer and consumer choice on every occasion.

Unilever is committed to achieving this goal by meeting or exceeding all legal and regulatory requirements and through the rigorous application of our Quality Management System. Each personal product quality experience for our consumers depends upon all employees understanding their roles and responsibilities and ensuring that they adhere to Unilever's quality standards, business processes and regulatory requirements at all times.

Unilever will take prompt and timely action wherever and whenever we encounter products which don't meet our standards or those required in the market place. We will continuously improve product quality experiences by using the insights gained from our performance measures and from consumer and customer feedback.

This Code Policy applies to all aspects of product quality including safety, design, formulation, raw materials, primary/secondary/tertiary packaging, manufacture, storage, transport, display, marketing, communication, sales and disposal of Unilever products – at Unilever, third-party or business partner facilities.

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; and
- Promptly discuss concerns with line management and take steps to address any information regarding a potential or actual product quality, regulatory or safety issue.

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 quality without sufficient knowledge or authority; or
- Respond to customers or consumers about the quality or safety of products without authorisation to do so.

RESPONSIBLE SOURCING

Unilever expects its business partners to adhere to values and principles consistent with our own. Unilever is developing new business practices to grow our company and communities, by doing business in a manner that improves lives of workers across our supply chain, their communities and the environment, consistent with the Unilever Sustainable Living Plan.

Our requirements of suppliers (companies that supply Unilever with goods and/or services, across both production and non-production areas of our business) are set out in our Responsible Sourcing Policy (RSP). Unilever's reputation could suffer significant damage if suppliers fail to comply with these requirements.

The RSP affirms the following Fundamental Principles:

1. Business is conducted lawfully and with integrity
2. Work is conducted on the basis of freely agreed and documented terms of employment
3. All workers are treated equally and with respect and dignity
4. Work is conducted on a voluntary basis
5. All workers are of an appropriate age
6. All workers are paid fair wages
7. Working hours for all workers are reasonable
8. All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively
9. Workers' health and safety are protected at work
10. Workers have access to fair procedures and remedies
11. Land rights of communities, including indigenous peoples, will be protected and promoted
12. Business is conducted in a manner which embraces sustainability and reduces environmental impact.

All Unilever Purchasing Agreements/ Contracts (UPAs/Global GTCs), Master and Local Purchase Agreements (MPAs/LPAs) or Unilever Master Services Agreements (MSAs) specify that suppliers must acknowledge adherence to our RSP as a condition of supply.

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

Musts

Employees who contract and/or work with Unilever's suppliers **must**:

- Read and understand the Fundamental Principles and consult their line manager or the relevant Supply Management business partner if they have any questions;
- Notify their line manager and, if appropriate, the relevant Supply Management business partner if they know or suspect that suppliers are not meeting relevant RSP requirements within the Responsible Sourcing Policy;
- Ensure that any shortlists or tendering processes for new suppliers for which they are responsible consider potential suppliers' credentials in areas covered by the RSP.



Must nots

Employees who contract and/or work with Unilever's suppliers **must not** agree to any contractual changes or exclusions with respect to the RSP without consulting their Legal business partner and prior written authorisation from their Regional Director Supplier Excellence or Vice President Supplier Excellence.

FAIR COMPETITION (1 of 2)



Competition laws prohibit anti-competitive agreements (or cartels) between competitors. Many national laws also prohibit abuses of dominant position and include specific rules relating to agreements with distributors and other customers. Investigations by competition authorities may result in significant fines and costs, and damage our reputation. Criminal sanctions may also apply.

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

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

Musts

Market Cluster/country Heads **must** ensure that:

- Legal prohibitions and requirements that apply to **employees** in the markets for which they are responsible have been identified and documented with support from Legal Group and are understood by all employees;
- Communication and training programmes addressing relevant competition law prohibitions and requirements have been approved by Legal Group and implemented, including tailored programmes for specific and/or 'high risk' groups of employees and others working for Unilever.

Employees **must**:

- Follow requirements regarding competition law compliance for the markets in which they operate and undertake all relevant training required;
- Consult their Legal business partner immediately if they are unsure about the legality of any activity;

FAIR COMPETITION (2 of 2)

Musts (continued)

- Where possible, always consult their Legal business partner before meeting a competitor or discussing or agreeing anything about which they have concerns (see the Code Policy on [Legal Consultation](#));
- Take care that participation in industry or trade associations events and related contacts are not used for anti-competitive purposes; this also applies to less formal meetings or events that involve competitors, such as awards ceremonies or associated social contacts;
- 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;
- Object immediately if inappropriate topics are raised in any industry or trade association discussion and leave immediately – and noticeably – if any inappropriate discussion continues;
- Report incidents of inappropriate discussions immediately to their line manager and the relevant Legal business partner.

Must nots

Employees **must not** participate in cartels. In particular, they **must not** discuss or agree any of the following, directly or indirectly, with competitors:

- 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
- The division or allocation of geographic markets, customers or product lines
- Boycotts or refusals to deal with certain competitors, customers or suppliers.

Legitimate joint purchasing arrangements, production, research and development and standardisation agreements that have received prior written approval from Legal Group are excluded from the above.

Co-operating with competition authorities

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



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.

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 and/or written correspondence.

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.

Musts

When interacting with government, legislators, regulators or NGOs, **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; and
- Keep a record of all contacts and interactions.

The following additional requirements apply in certain situations:

Representing our legitimate interests

Any contact between Unilever employees and officials aimed at representing our legitimate interests **must** only be done with prior approval, as follows:

- Global/international = VP Regulatory Affairs, VP Global Advocacy or Global External Affairs Director;
- Market Cluster = VP Regional Communications & Sustainable Business or Cluster External Affairs Director;
- National or local = National External Affairs Director or Head of Communications.

The only exceptions regard taxation, financial reporting/accounting, pensions or legal matters. Contacts on such topics **must** have prior approval from the local Finance Director/General Counsel, or Corporate Tax Department, Group Controller, Corporate Pensions Department or local General Counsel, respectively. The relevant External Affairs contact **must** be notified as appropriate.

CONTACT WITH GOVERNMENT, REGULATORS & NON-GOVERNMENTAL ORGANISATIONS (NGOS) (2 of 2)

Musts (continued)

Contact with regulators about products and/or ingredients

Any contact with regulators about Unilever's actual or planned use of products and/or ingredients **must** have the prior approval of Regulatory Affairs (which will, in turn, seek necessary clearances from Legal Group).

Any contact with regulators **must** have the prior approval of the local Regulatory Affairs Departments. If employees do not have such departments in their location, they **must** get approval from the local or cluster head of Regulatory Affairs. At times, this approval may be given on a standing basis.

Contact with NGOs

Any contact with NGOs **must** have the prior approval of the local External or Public Affairs Departments. If employees do not have such departments in their location, they **must** get approval from the local or Cluster head of Communications. At times, this approval may be given on a standing basis.

Regulatory investigations

- Unilever site leaders **must** have up-to-date procedures 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.
- Employees **must not** attempt to obstruct the collection of information, data, testimony or records by authorised investigators or officials.
- Employees **must not** 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 Unilever 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 that:

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

Must nots

Unilever companies **must not**, directly or indirectly, support or make contributions to political parties or candidates. Communication, financial contributions, benefits in-kind, gifts, sponsorships and use of Unilever resources are all prohibited.

Involvement in the type of social or economic advisory groups mentioned above **must not** create a conflict of interest for employees (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 functions **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

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.unilevercodesupport.ethicspoint.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: contractors, temporary staff, secondees, work experience placements; those with a statutory Director role or equivalent responsibilities; employees of joint ventures and approved third-party labour providers where Unilever has direct management control; 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.

Operational units

MCOs, Global Categories, Global & Cluster Supply Chain Leadership Teams, Global Supply Management, IT and Global Business Services.

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, 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.



