

Unilever GC Advanced COP Self-Assessment

Implementing the Ten Principles into Strategies & Operations				
GC Scope or Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators
Scope: Implementing the Ten Principles into Strategies & Operations	Criterion 1: The COP describes mainstreaming into corporate functions and business units.	<p>Our commitment to responsible business is embedded into our business agenda through our purpose and vision, articulated in our Code of Business Principles Code of Business Principles and carried out through Unilever Sustainable Living Plan.</p> <p>We are integrating sustainability into our strategy, brands and innovation to help drive business growth. We are working with our customers and suppliers, engaging employees and forging new partnerships.</p> <p>Our management structures to help us fulfil our commitment are integrated into our organisational framework.</p>	About Unilever Unilever Sustainable Living Unilever's Code of Business Principles Purpose & principles Embedding sustainability Our governance	4.8
	Criterion 2: The COP describes value chain implementation.	<p>Our Plan spans our entire portfolio of brands, all countries in which we sell our products and it applies across the whole value chain – from the sourcing of raw materials to our factories and the way consumers use our products.</p> <p>Our Responsible Sourcing Policy (RSP) embodies our commitment to conduct business with integrity, openness, and respect for universal human rights and core labour principles throughout our operations. It advocates a “beyond compliance approach to our extended supply chain”.</p>	Our strategy Advancing human rights in our own operations Advancing human rights with suppliers Unilever's Responsible Sourcing Policy	

			Implementing our approach Working with Others	
Human Rights Management Policies & Procedures				
GC Scope or Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators
<p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.</p> <p>Principle 2: Businesses should make sure that they are not complicit in human rights abuses</p>	<p>Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights.</p>	<p>We are committed to driving fairness by further building human rights across our operations, and advancing human rights in our extended supply chain, developing a continuous improvement roadmap and promoting best practice.</p> <p>Our approach is to uphold and promote human rights in three ways:</p> <ol style="list-style-type: none"> 1. in our operations by upholding our values and standards 2. in our relationships with our suppliers and other business partners, and 3. by working through external initiatives, such as the UNGC <p>We continue to build our employees' and workers' awareness and knowledge of human rights, encouraging them to speak up, without retribution, about any concerns they may have.</p>	<p>Purpose & principles</p> <p>Unilever's Human Rights Policy Statement</p> <p>Unilever's Code of Business Principles</p> <p>Advancing human rights in our own operations</p> <p>Advancing human rights with suppliers</p> <p>Unilever's Responsible Sourcing Policy</p> <p>Working with others</p> <p>Responding to stakeholder concerns on human rights</p> <p>Values and standards</p>	<p>HR1, HR2, HR3, HR5, HR6, HR7</p>

		<p>We follow the OECD Guidelines for Multinational Enterprises and are a founding signatory to the United Nations Global Compact. We are committed to respecting all internationally recognised human rights as relevant to our operations.</p>	<p>Implementing our approach</p> <p>Winning with Integrity</p>	
	<p>Criterion 4: The COP describes effective management systems to integrate the human rights principles</p>	<p>Our RSP sets mandatory requirements on human and labour rights for our suppliers and includes a continuous improvement ladder. Mandatory requirements are entry level for doing business, then advancing to good/best practice over time – from doing no harm to doing good. New focus areas include women, land rights and strengthened grievance mechanisms.</p> <p>The Board of Unilever is responsible for ensuring adherence to these commitments and our senior management has responsibility for overseeing their implementation and ensuring that any breaches of our Code of Business Principles are investigated.</p>	<p>Enhancing Livelihoods</p> <p>Professor John Ruggie's view on Unilever's approach to human rights.</p>	
	<p>Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration.</p>	<p>We undertake impact assessments for high risk commodities/countries and take proactive steps to identify activities that may cause/ contribute to negative human rights impacts.</p> <p>We have established benchmarks for best practice/capacity building in extended supply chain on grievance mechanisms/ employment practices, including protecting vulnerable workers.</p> <p>We were the first adopter of the UN Guiding Principles Reporting Framework and are publishing our first Human Rights Report later this year.</p>		

	<p>Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.</p> <p>We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved whether directly or indirectly through our own activities or our business relationships. We manage these risks by integrating the responses to our due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.</p>		
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Labour Management Policies & Procedures				
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GC Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators
<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p> <p>Principle 4: The elimination of all forms of forced and compulsory</p>	<p>Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour</p>	<p>Our Respect, Dignity & Fair Treatment Code Policy sets out our commitment to human rights and specifically to treat our employees and business partners with dignity, integrity and fairness.</p> <p>Our Code of Business Principles states that “We will not use any form of forced, compulsory or child labour”. Our internal Social Impact Hub gives guidance on issues including child, migrant and contract labour.</p> <p>We prohibit discrimination and we are committed to safe and healthy working conditions, the right to freedom of association and collective bargaining, and to effective information and consultation procedures. We expect our</p>	<p>Unilever’s Code of Business Principles</p> <p>Unilever’s Human Rights Policy Statement</p> <p>Purpose & principles</p> <p>Fairness in the workplace</p> <p>Working with others</p>	<p>HR4, HR5, HR6, HR7</p>

<p>labour.</p> <p>Principle 5: The effective abolition of child labour.</p> <p>Principle 6: The elimination of discrimination in respect of employment and occupation</p>		<p>partners to adhere to business principles consistent with our own.</p> <p>We have committed to creating a framework for fair compensation, and help employees take action to improve their health (physical and mental), nutrition and well-being. We will reduce workplace injuries and accidents in our factories and offices.</p>	<p>Oxfam report- Labour Right's in Unilever's Supply Chain</p> <p>Values and standards</p> <p>Winning with integrity</p>
	<p>Criterion 7: The COP describes effective management systems to integrate the labour principles</p>	<p>We live by the principles of diversity and inclusion and work to embed these firmly into our day-to-day business decisions via our talent management and people processes.</p>	<p>Upholding diversity</p> <p>Advancing human rights in our own operations</p>
	<p>Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration</p>	<p>Employees can report concerns to their Line Manager, local Code Officer, or a member of their local Code Committee. We have a web-based reporting process for both employees and suppliers, in addition to existing telephone and email reporting systems. Alternatively, they can use the confidential 'Code Support Line' (whistleblowing line) using the telephone or internet. All reported breaches of the Code of Business Principles are monitored and dealt with by our local business leaders at country level.</p>	<p>Advancing human rights with suppliers</p>

Environmental Management Policies & Procedures				
GC Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators
<p>Principle 7: Businesses should support a precautionary approach to environmental challenges.</p> <p>Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p>Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.</p>	<p>Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship</p>	<p>By 2020 our goal is to halve the environmental footprint of the making and use of our products as we grow our business. This covers our entire value chain from the sourcing of raw materials through to consumer use and disposal.</p> <p>Our approach has five aspects:</p> <ol style="list-style-type: none"> 1. Working to eliminate deforestation 2. Championing sustainable agriculture and the development of smallholder farmers 3. Leveraging our brands and innovation to help consumers live well - by using less water, less energy and recycling more 4. Shaping our manufacturing and distribution operations to be more eco-efficient 5. Advocating for ambitious public policy to tackle climate change. <p>Our Environmental Policy states: “Unilever is committed to meeting the needs of customers and consumers in an environmentally sound and sustainable manner, through continuous improvement in environmental performance in all our activities.</p> <p>Our CEO is a Commissioner on the Global Commission on the Economy and Climate, which produced the NCE report ‘The New Climate Economy Report’, which aims to drive action by world leaders, business executives and investors on climate change and development together.</p>	<p>Environmental management system</p> <p>Unilever’s Responsible Sourcing Policy</p> <p>Unilever’s Sustainable Agriculture Code</p> <p>Reducing Environmental Impact</p> <p>Tackling climate & development together</p> <p>Eliminating deforestation</p> <p>Greenhouse gases</p> <p>Water use</p> <p>Waste & packaging</p> <p>Sustainable sourcing</p> <p>Eco-efficiency in manufacturing</p> <p>The New Climate</p>	<p>4.11, EN1-EN29</p>

	<p>Criterion 10: The COP describes effective management systems to integrate the environmental principles</p>	<p>Our environmental management system (EMS) underpins our environment strategy. All Unilever companies must comply with the Unilever standards for occupational safety and health and environmental care (SHE).</p> <p>Based on ISO 14001, our environmental management systems are designed to achieve continuous improvement.</p>	<p>Economy: Global Report</p> <p>Advocacy & partnerships for transformational change</p>
	<p>Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship</p>	<p>We have developed a set of metrics to assess our environmental impacts across the value chain covering: greenhouse gas (GHG) emissions, water, waste and sustainable sourcing.</p> <p>We also deliver tools, techniques and awareness, and share best practice directly with the people responsible for reducing the environmental impact of our manufacturing operations.</p> <p>Environmental auditing programmes have been implemented within each region to help sites achieve continuous improvement in environmental performance.</p>	

Anti-Corruption Management Policies & Procedures				
<p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.</p>	<p>Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption</p>	<p>Unilever has a zero tolerance approach to bribery in any form: it is committed to being a no-bribe business & eradicating any practices or behaviours in this regard. This zero tolerance policy extends to Unilever employees, contractors, third parties, new acquisition and joint-ventures, through which or with whom we do business, irrespective of financial values involved. We operate with a broad definition of corruption which includes fraud and financial misrepresentation, conflicts of interest, bribery, anti-trust activity, misuse of information and misrepresentation of the company or its assets.</p> <p>Integrity, responsibility, respect & pioneering are enshrined in our longstanding Code of Business Principles (CoBP) and 24 Code Policies. Our CoBP & Code Policies are mandatory and they define minimum standards of behaviour required and go significantly beyond complying with laws and regulations. Our dedicated Code Policies cover a range of areas and specifically within the corruption area they include: Corruption & bribery: Anti-Bribery, Avoiding Conflicts of Interest, Gifts & Entertainment, Political Activities & Political Donations, Accurate Records, Reporting & Accounting & Protecting Unilever's Assets. Money laundering & insider trading: Anti-money Laundering & Preventing Insider Trading. Further these Code Policies are distilled into a 'Winning with Integrity' guide that is translated into 42 languages ensuring its global accessibility. All these give clear instructions on behaviours in which Unilever employees must & must not engage.</p>	<p>Reporting on breaches of our code</p> <p>Unilever's Code of Business Principles</p> <p>Values and Standards</p> <p>Purpose & principles</p> <p>Unilever's Responsible Sourcing Policy</p> <p>Winning with Integrity</p>	<p>SO2, SO3, SO4</p>

		<p>Mandatory training on 'Countering Corruption' is given to all employees. Any suspected CoBP breach is subject to an accelerated review procedure that involves subject-matter experts (SMEs) from Legal Group to ensure compliance with the UK Bribery Act and US Foreign Corrupt Practices Act. Confirmed breaches result in disciplinary action in line with Unilever's global Sanctions Standard.</p>
	<p>Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle</p>	<p>Unilever is a founding signatory of the UNGC: as a Board member CEO Paul Polman actively helps drive global efforts to combat bribery. In addition, the Chief Legal Officer (CLO) is a member of the UNGC's Business for the Rule of Law Steering Committee (B4ROL). The purpose of B4ROL is to engage the business community to reinforce the rule of law in addition to government activity. The framework to be created will provide corporations with guidance for voluntary action in their operations and business relationships to advance the rule of law. This work ties into the 10 principles of the UNGC; especially around human rights & countering corruption. The Unilever legal team has engaged actively in furthering this initiative, drawing other corporates to engage in creation of the framework at several locations worldwide.</p> <p>Our CoBP framework is built on the pillars of Prevent – Detect – Respond to ensure we have a continuous ability to develop our compliance programme based on learnings (e.g. from CoBP cases, self-assessments & audits). We also actively monitor regulatory developments & participate in conferences to share, learn and adopt best practices.</p>

The Chief Legal Officer (CLO) is responsible for the strategy and implementation of the Code compliance programme, including CoBP and Code Policies. She is supported by a new Chief Compliance Officer (CCO) Anny Tubbs. The CCO's global Compliance team is now part of Unilever's Legal function, giving Unilever dedicated, expert resource to embed a compliance culture and make the business more agile in identifying and mitigating compliance risks.

The CLO chairs the Unilever Global Code & Policy Committee (GCPC), which oversees compliance globally including related policies and standards. The GCPC reports to the Unilever Leadership Executive and to the Audit & Corporate Responsibility Committees of the Board of Directors.

To foster dialogue on best practices and thought leadership, Unilever partnered with Transparency International (TI) for an intercompany benchmarking exercise conducted by TI UK, Unilever's CCO is on the expert advisory panel of the TI UK & PriceWaterhouseCoopers (PwC) project to issue guidance on third party management. She joined the B20 Anticorruption Taskforce.

We look out for third party learnings through our membership of the Corporate Executive Board Compliance & Ethics Leadership Council. We partner with MapleCrest

		<p>for detailed indices of compliance risk by country and we recently engaged PwC to review our third party compliance programme for external validation and recommendations to build into our 2016-2020 Roadmap. Further, Unilever's risk assessment methodology builds on UN Global Compact, OECD, Transparency International and external advisor PWC's best practice.</p>		
	<p>Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption</p>	<p>We have a global process for reporting actual or potential CoBP breaches. Employees are encouraged to report CoBP breaches via internal channels: line manager, local Code Officer, member of the local Code Committee or email directly to the Unilever Executive. SMEs or Legal business partners may also be informed of concerns.</p> <p>We provide external channels for employees and Third Parties to log concerns through a portal (14 languages) or a 24-hour toll-free 'hotline' (200 languages). Concerns can be reported anonymously if the individual wish to do so and local law permits. A dedicated helpdesk covers questions about CoBP compliance.</p> <p>Potential CoBP and Code Policies breaches are monitored by country-based senior management, supported by the local Code Officer with oversight from 5 dedicated & experienced regional Legal Directors who report to the CCO. Breaches are tackled through to a local Code Committee unless senior executives are involved (in which case the CLO and CCO are personally involved). 'Reportable' breaches are escalated to the GCPC as well as to the Unilever Leadership Executive & the Audit and Corporate Responsibility Committees of the Board. They see a quarterly review of case analytics and 'reportable' Code breaches by country.</p>		

Taking Action in Support of Broader UN Goals and Issues				
<p>Scope: Taking Action in Support of Broader UN Goals and Issues</p>	<p>Criterion 15: The COP describes core business contributions to UN goals and issues</p>	<p>We are a founding signatory to the Global Compact and are committed to upholding its Principles across our business. In 2011 we joined the UN Global Compact LEAD and in 2012 our CEO, Paul Polman, joined the Board of the UN Global Compact.</p> <p>We are members of the Global Compact’s Business for the Rule of Law Steering Committee, Human Rights and Labour Working Group, Business for Peace (B4P) Platform, Women’s Empowerment Principles, Caring for Climate Initiative, UNGC LEAD Post-2015 Working Group, Food and Agriculture Business Principles (FAB Principles) Working Group and the CEO Water Mandate. We are current active members of various Global Compact local networks including Kenya, UK, France, Sri Lanka, Netherlands, Indonesia, Colombia, India, Argentina</p> <p>In addition, our CEO was a member of the UN High Level Panel on the Post-2015 agenda, for which we have organised an extensive private sector outreach on the SDGs in 2013, engaging directly with over 300 businesses of all sizes, sectors and markets - with combined revenues representing over 10% of global GDP. In 2014 we have also coordinated the ‘Business Manifesto’ to which the UNGC has provided input – a call to arms of 23 companies in support of the SDGs and their implementation.</p> <p>In July 2013 we endorsed the Women’s Empowerment Principles, collaboration between the UN Global Compact and UN Women. In addition, in 2014 we committed to UN Women’s HeForShe campaign which aims to secure the commitment of 1 billion men globally to support gender</p>	<p>Working with others</p> <p>Global Partnerships</p> <p>The Unilever Foundation</p> <p>Driving transformational change</p> <p>Unilever BrightFuture</p> <p>UN Sustainable Development Goals</p> <p>Upholding diversity</p> <p>The ‘Power of Partnerships’ video – produced by Unilever as an input to the UN Secretary-General’s High-level Panel on the Post-2015 Development Agenda</p> <p>Engaging with our stakeholders</p> <p>Tackling climate & development together</p>	

		<p>equality and women's empowerment.</p> <p>We have also given our support to the Business for Peace Platform and to an open letter to academic institutions in support of the incorporation of business and human rights topics in management education.</p>		
	<p>Criterion 16: The COP describes strategic social investments and philanthropy</p> <p>Criterion 17: The COP describes advocacy and public policy engagement</p> <p>Criterion 18: The COP describes partnerships and collective action</p>	<p>The Unilever Foundation's mission is to improve quality of life through the provision of hygiene, sanitation, access to clean drinking water, basic nutrition as well as by enhancing self-esteem. The Foundation partners with five leading global organisations – Oxfam, Population Services International (PSI), Save the Children, UNICEF, and the World Food Programme.</p> <p>In addition to our focus on water, sanitation and hygiene (WASH), we are investing in livelihoods, sustainable sourcing and women's empowerment. Our partners are in these areas include: Acumen, Clinton Giustra Enterprise, the Ford Foundation, and the Global Alliance for Improved Nutrition (GAIN).</p> <p>We believe that Unilever should play an active role in shaping legislation and regulations that enhance positive social and environmental outcomes. We have a dedicated advocacy team that works together with a wide range of stakeholders to bring about transformational changes in public policy in key areas of sustainability.</p> <p>We actively engage with governments and regulators to help create an environment that can help us achieve the commitments set out in the Unilever Sustainable Living Plan.</p>		

Corporate Sustainability Governance and Leadership				
Scope: Corporate Sustainability Governance and Leadership	Criterion 19: The COP describes CEO commitment and leadership	<p>The Unilever Leadership Executive (ULE) led by our Chief Executive Officer, monitor implementation and delivery of the Unilever Sustainable Living Plan.</p>	Unilever Sustainable Living	1.1, 4.1, 4.12, 4.15-17
	Criterion 20: The COP describes Board adoption and oversight	<p>Strong governance structures enable us to deliver our Plan, realise the benefits for the business and draw on relevant expert input. Sustainability and corporate responsibility are championed and led by a member of the Unilever Leadership Executive (ULE): Keith Weed, Chief Marketing and Communication Officer. Keith Weed also chairs the Unilever Sustainable Living Plan Steering Team which supports the ULE. Governance of our conduct as a responsible corporate citizen is provided by our Boards' Corporate Responsibility Committee. Both our Unilever Sustainable Living Plan Steering Team and Board Committee benefit from the insights of the Unilever Sustainable Living Plan Council (USLP Council) – a group of external specialists in corporate responsibility and sustainability who guide and critique the development of our strategy.</p>	Our governance Our strategy Engaging with stakeholders Working with others Global partnerships Embedding sustainability Scaling for impact: Summary of progress 2014	
	Criterion 21: The COP describes stakeholder engagement.	<p>Engaging with stakeholders is essential in building our reputation, developing long-term relationships and helping to understand stakeholder concerns and expectations. It informs our decision-making, strengthens our relationships and helps us deliver our commitments and succeed as a business.</p> <p>We seek to actively engage with governments, intergovernmental organisations, regulators, customers, suppliers, investors, civil society organisations, workers' organisations, academics and individual concerned citizens</p>	Annual Report and Accounts 2014 p. 2-4, 17-28, 41-42	

		<p>to create an environment that is supportive of solutions in the face of the big sustainability challenges</p> <p>The variety of our relationships means we engage in different ways, depending on the nature of the interest, the relevance to the business and the most practical way to meet stakeholders' specific needs and expectations.</p>		
Annex: Business for Peace*				
Scope: Business for Peace	Annex 1: The COP describes policies and practices related to the company's core business operations in high-risk or conflict-affected areas	<p>In December 2013, Unilever published an update on working conditions at our tea estates in Kericho. This followed allegations of sexual harassment of female workers in an August programme by ARTE (a Franco-German TV channel). These allegations were investigated and an extensive independent review made six recommendations to improve the gender balance within the Team Leader community and the grievance handling system. Unilever fully accepted these recommendations which were implemented immediately.</p>	<p>Kericho tea estates: working conditions</p> <p>Purpose & principles</p> <p>The Unilever Foundation</p>	
	Annex 2: The COP describes policies and practices related to the company's government relations in high-risk or conflict-affected areas	<p>Unilever neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests. We prohibit participation in the activities of political parties for business purposes.</p>		
	Annex 3: The COP describes local stakeholder engagement and strategic social investment activities of the company in high-	<p>The Unilever Foundation is taking a targeted approach to its social investments by focusing our support on helping to improve the quality of people's lives through the provision of hygiene, sanitation, basic nutrition and access to safe drinking water, as well as by enhancing self-esteem.</p>		

	<p>risk or conflict-affected areas</p>	<p>Since 2012, the Foundation has partnered with five leading global organisations – Oxfam, Population Services International (PSI), Save the Children, UNICEF and the World Food Programme (WFP). By working together, we have expanded the delivery of life-saving solutions and contributed to systemic and scalable social change.</p> <p>Our Foundation partners also serve as our primary beneficiaries in times of disaster and emergency relief so that we are able to provide critical resources expeditiously when there is the greatest need and on longer-term projects to help rebuild communities.</p>		
<p>*Business for Peace Brochure (2013) aims to expand and deepen private sector action in support of peace - in the workplace, marketplace and local communities. Assists companies in implementing responsible business practices aligned with the Global Compact ten principles in conflict-affected and high-risk areas and catalyse action to advance peace</p>				

