

Unilever Global Compact Advanced COP 2018 Self-Assessment

Implementing t	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.	Our commitment to responsible business is embedded into our business agenda through our purpose and vision, articulated in our Code of Business Principles and carried out through the Unilever Sustainable Living Plan (USLP), which is our blueprint for sustainable growth. Our Code of Business Principles are mandatory for all employees and others working for Unilever, including our board of directors, and apply to all Unilever companies, subsidiaries and organisations over which Unilever has management control. We are integrating sustainability into our brands and innovation to help drive business growth. To assess product and purpose, we developed a methodology to help us determine how, and to what extent, each brand delivers against the two criteria. These are called our Sustainable Living Brands. 26 of our top 40 brands are now Sustainable Living brands. It enables brands to generate a systematic view of their progress across social and environmental factors. In 2017, we analysed our top brands using this methodology. Our analysis	Our strategy Our vision Our sustainability governance Embedding sustainability Code of Business Principles Advancing human rights in our own operations Advancing human rights with	G4-1 G4-2	

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	revealed that in 2017 our Sustainable Living brands delivered more than 70% of Unilever's turnover growth. We believe that if we want to effect change at scale, we will achieve this by making large, successful, category-defining brands recognisably sustainable. Our five biggest brands, namely Dove, Dirt is Good, Knorr, Hellmann's and Lipton, are all Sustainable Living brands We are working with our customers, and suppliers, engaging employees and forging new partnerships. We have developed a simple four-point framework to help capture the ways in which sustainability contributes to our business success – more growth, lower cost, less risk, more trust. Our USLP Steering Team (USLP ST) includes nine of our 13 Unilever Leadership Executive (ULE) members, including our Chief Marketing & Communications Officer (chair); Chief R&D Officer; Chief Supply Chain Officer; and three Divisional Presidents, and is responsible for approving new USLP targets and monitoring progress. The Board's Corporate Responsibility Committee (CRC) monitors USLP progress as one of its allocated focus risks. The USLP ST and CRC benefit from the insights of the USLP Council – a group of external specialists who guide and critique our sustainability strategy. In 2017, we reviewed the strategy for our USLP Council and relaunched the Council with six new members in 2018. The USLP spans our entire portfolio of brands, all countries in which we sell our products and applies across our whole value chain – from the sourcing of raw materials to our factories and the way consumers use our products. To embed sustainability into every stage of the life cycle of our products, we're working with our suppliers to support responsible approaches to sourcing raw materials.	suppliers & business partners Responsible Sourcing Policy Responsible Business Partner Policy
Criterion 2: 7 COP describe value chain implementat	and to the communities in which we have a presence. Around the world, we invest in local economies and develop people's skills inside and	Sustainable Living Report 2017

	deforestation, creating more opportunities for women and enhancing livelihoods, promoting health & well-being, championing sustainable agriculture and improving food security. Our Responsible Sourcing Policy (RSP) and our Responsible Business Partner Policy (RBPP) both updated in 2017 embody our commitment to conduct business with integrity, openness, and respect for universal human rights and core labour principles advocating a beyond compliance approach to both our supply and distribution channels.		
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Human Rights Ma	Human Rights Management Policies & Procedures				
GC Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights.	In line with the UN Guiding Principles on Business and Human Rights (2011), we base our human rights commitment and policy on the International Bill of Human Rights (consisting, in addition to the Universal Declaration of Human Rights, of the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We also support the OECD Guidelines for Multinational Enterprises. Our approach is to uphold and promote human rights in three ways:	Human Rights Report 2015 Human Rights Progress Report 2017 Unilever Human Rights Policy Statement	G4-HR3 G4-HR4 G4-HR11	
Principle 2: Businesses should make sure that they are not complicit		 In our operations by upholding our values and standards. In our relationships with our suppliers and other business partners. By working through external initiatives, such as the UN Global Compact A key requirement of the UN Guiding Principles is for businesses to have a policy statement that addresses their responsibility to respect human 	Advancing human rights in our own operations		

inhuman rights abuses		rights. Our Human Rights Policy Statement provides clarity on our commitment to respect universal principles, our due diligence processes and our governance.	Advancing human rights with
		We were the first company to adopt and use the UN Guiding Principles Reporting Framework to produce a comprehensive, standalone Human Rights report, published in June 2015, fulfilling our commitment to report publicly on our implementation of the UN Guiding Principles on Business and Human Rights. In the report we focus on our 'salient' human rights issues - that is, those that are at risk of the most severe negative impacts through our activities or business relationships. This approach is in line with the UN Guiding Principles on Business and Human Rights. We describe our progress in our second Human Rights Report, published in December 2017. We are committed to ensuring that all our employees work in an environment that promotes diversity, trust, human rights and equal opportunities, and is free from discrimination or victimisation. Our Respect, Dignity and Fair Treatment Code Policy sets out what we and our employees must do to ensure this, and forms part of the framework of policies supporting our Code of Business Principles.	suppliers & business partners Our values & principles Unilever Responsible Sourcing Policy Business Integrity Enhancing Livelihoods Human Rights Policy Statement Our Respect,
	Criterion 4: The COP describes effective management systems to integrate the human rights principles	Our Responsible Sourcing Policy sets out our expectations with regards to the respect for the human rights, including labour rights, of the workers in our extended supply chain. We will only work with suppliers who implement our Responsible Sourcing Policy. They must agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns.	Dignity and Fair Treatment Code Policy Responsible Sourcing Policy Responsible Business Partner Policy

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Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration.

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 including with our non-supplier business partners who must align with our Responsible Business Partner Policy. 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. We undertake impact assessments for high risk commodities/countries/interactions and take proactive steps to identify activities that may contribute to negative human rights impacts.

In 2017, we rolled out an internal training programme on forced labour to raise awareness and build capacity. We also co-sponsored three industry supplier training events in Dubai, India and Malaysia.

Our UK Modern Slavery Act Transparency Statement 2018 gives specific information relating to our work to eradicate forced labour from global supply chains. Recognising temporary workers as potentially vulnerable to poor working conditions, we carried out a survey to monitor the numbers, roles and terms and conditions of temporary workers in our operations. The realisation of the right to Freedom of Association in addition to the provision of grievance mechanisms in line with the UN Guiding Principles on Business and Human Rights is vital to effectively evaluate our progress. We created internal guidance in 2017 relating to Human Rights elements of Mergers and Acquisitions. For more information of how we are both integrating human rights principles and monitoring this work see both our Human Rights Report and our work on understanding our human rights impacts (links in next column).

Modern Slavery
Transparency
Statement 2018

Principle 3: Businesses should uphold the freedom of association and the effective recognition of	Criterion 6: The COP describes robust commitments, strategies or policies in the	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 partners to adhere to business principles consistent with our	Responsible Sourcing Policy	G4-HR3 G4-HR4
Businesses should uphold the freedom of association and the effective recognition of the right to collective	The COP describes robust commitments, strategies or	working conditions, the right to freedom of association and collective bargaining, and to effective information and consultation procedures. We expect our partners to adhere to business principles consistent with our		
should uphold the freedom of association and the effective recognition of the right to collective	describes robust commitments, strategies or	bargaining, and to effective information and consultation procedures. We expect our partners to adhere to business principles consistent with our	Policy	G4-HK4
the freedom of association and the effective recognition of the right to collective	robust commitments, strategies or	expect our partners to adhere to business principles consistent with our		
association and the effective recognition of the right to collective	strategies or	, , ,	Unilever Human Rights	
recognition of the right to collective	_	own, and implement this through our Responsible Sourcing Policy and	Policy Statement	
the right to collective	naticiae in tha	Responsible Business Partner Policy.	Human Rights Report	
collective	area of labour	Our Respect, Dignity & Fair Treatment Code Policy sets out our commitment	2015	
bargaining.		to human rights within our own operations, specifically our commitment to ensuring a working environment that promotes diversity, where there is	Human Rights Progress	
		mutual trust, respect for human rights and equal opportunity, and no	Report 2017	
		unlawful discrimination or victimisation.	Advancing human rights	
Principle 4: The		Our Code of Business Principles states that "We will not use any form of	with suppliers &	
elimination of		forced, compulsory, trafficked or child labour". Our internal Social Impact	business partners	
all forms of		Hub gives guidance on issues including child, migrant and contract labour		
forced and compulsory		and the eradication of forced labour including modern day slavery.	Working with others on	
labour.		During 2015 we worked with the Fair Wage Network to develop a	<u>human rights</u>	
		Framework for Fair Compensation. The Framework outlines how the various existing elements of our compensation packages deliver fair compensation	Annual Report:	
Deirectoria E. The		to our employees and is supported by a methodology to monitor our	<u>Diversity and Inclusion</u>	
Principle 5: The effective		employees' rewards against relevant Living Wage benchmarks.	<u>p. 31</u>	
abolition of		This work enabled us to set a target to achieve full Living Wage compliance	Our values & principles	
child labour.		for all our 169,000 direct employees by 2020. In 2017 we brought our	Advancing diversity &	
		ambition forward to end 2018. We have a longstanding commitment to	inclusion	
		equal pay for equal work, which forms another principle of our Fair		

Principle 6: The elimination of discrimination in respect of employment and occupation

gender neutral, with any pay differences between employees in similar jobs fairly reflecting levels of individual performance and skill.

Our dialogue with suppliers and business partners is critical, where they feel able actively to raise issues so that we can work together to share best practices and respond to challenges as they emerge. For example, to keep the lines of communication open, our procurement managers work directly with suppliers to help identify risks and remediate gaps in policies and practices.

We regularly engage with expert organisations such as Shift and the Institute for Human Rights and Business, and with trade unions and civil society organisations, such as Oxfam, on human rights including labour rights. We support the Children's Rights and Business Principles developed by UNICEF, Save the Children and the UN Global Compact. We are members of industry organisations such as the Consumer Goods Forum (CGF), Aim Progress and the World Business Council for Sustainable Development, where we use our membership to work with other businesses to scale up solutions to human rights issues. Unilever is a member of the Institute for Human Rights and Business Leadership Group for Responsible Recruitment where we are committed to the Employers Pays Principle – that no worker should pay for a job and we were instrumental in the CGF resolution on forced labour and subsequent Three Priority Industry Principles.

We have signed a partnership agreement with non-profit organisation Solidaridad to work with our suppliers on issues such as gender equity and improving labour practices. Marcela Manubens, Unilever's Global Vice-President for Integrated Social Sustainability serves on the World Economic Forum's Global Future Council on Human Rights and a member of the Advisory Group on Human Rights to the UK Foreign Secretary. Marcela Manubens' team sits within the Supply Chain function to enable us to comprehensively implement and embed our human rights approach.

We have relationships with trade unions both at the local and global level. We have established a global forum with the International Union of Food workers (IUF) and IndustriALL on labour rights to identify, discuss and

Promoting safety for women

Working with others on human rights

Responsible Business
Partner Policy

Fairness in the Workplace

		address issues and geographies of concern. We meet twice a year and have specific working groups on Diversity and Sustainable Employment in between.		
T d	Criterion 7: The COP describes effective management	We have sought to align and expand our internal policy framework with the UN Guiding Principles on Business and Human Rights, which has facilitated their integration into pre-existing policies and codes. These in turn drive our internal and external compliance requirements.		
iı	systems to integrate the labour	For example, we strengthened our Code of Business Principles in 2016. Our approach focused on the role every individual plays in living our values.	Links as per above in Criterion 6	
p p	principles	Some examples of questions asked during the 2017 Integrity Pledge week were: How do you Protect What You Love? What do you feel the need to Protect? What inspires you to work for a company with strong values and a clear purpose? How does Business Integrity come to life in your local team or area?		
		The campaign included insights and images from Paul Polman, our CEO, and other senior leaders who encouraged employees to refresh their understanding and renew their commitment to our policies, have open conversations and speak up across the business. Over 55,000 employees have taken part and signed our online Pledge to uphold the principles embedded within our Code of Business Principles.		
		We have also strengthened our internal Respect, Dignity and Fair Treatment Code Policy. In 2015 we developed a Responsible Business Partner Policy to align with our Responsible Sourcing Policy, which we launched in April 2014 and both were enhanced and updated in 2017.		
		Effective grievance mechanisms, as described in the UN Guiding Principles, are critical in ensuring that human rights, including labour rights, are respected. We have developed a single integrated channel to ensure that our employees can raise grievances, issues and concerns as simply as		

	possible. We have also further developed and strengthened our tools to analyse and resolve the grievances and breaches we receive.		
Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour	Since 2012, we provide a web-based reporting process for both employees and suppliers, in addition to existing telephone and email reporting systems. Employees can also report concerns to their line manager, local Business Integrity Officer or a member of their local Business Integrity Committee. Alternatively, they can use our confidential external 'Unilever Code Support Line' (whistleblowing line) via telephone or internet. Business Integrity training and communications materials provide details of available options. All reported breaches of the Code of Business Principles are monitored and dealt with by our local business leaders at country level.	Externally available: Whistleblowing reporting site	
principles integration	We continue to align our own factories with our Responsible Sourcing Policy, using independent, external on-site audits determined from a risk-based perspective. This ensures that all internal sourcing units are held to the same standard as external suppliers.		
	We are seeking to improve our analytical capabilities to make sure any internal trends, hot spots and root causes are rapidly identified and remediated through the introduction of appropriate controls.		
	We are committed to transparency, acknowledging that many challenges remain which must be resolved. In the Salient Issues section of our Human Rights report, we discuss the complexities present in both our operations and our extended supply chain. We have continued to expand our Framework for Women's Safety and created global Land Rights Principles and Implementation Guidance which we will use to monitor our work to address potential human rights issues. Our 2017 Human Rights Progress Report shows our progress against each of our salient human rights issues in both our own operations and extended supply chain and the actions we are		
	taking to remedy any issues.		

Environmental N	/lanagement Poli	cies & Procedures		
GC Principle	Criteria for GC Advanced Level	Unilever Approach	Where To Find Out More	Reference to GRI Indicators
Principle 7: Businesses should support a precautionary approach to environmental challenges. Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility. Principle 9: Businesses should encourage the development and diffusion of environmentally	Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship	Our Code of Business Principles states that we are committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. Furthermore, our Code states we will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice. Our approach has five aspects, which aim to affect change within our own operations and beyond: 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. By 2030 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 our raw materials and our own manufacturing, through to consumer use and disposal. In 2015 we set an ambition to become 'carbon positive' in our operations by 2030 which includes sourcing 100% of our energy across our operations from renewable sources. We have committed to ensure all our plastic packaging is designed to be reusable, recyclable or compostable by 2025. In January 2017, we committed to ensuring that 100% of our plastic packaging will be reusable, recyclable or compostable by 2025. This was in addition to our	Reducing environmental impact Greenhouse gases Water use Waste & packaging Sustainable sourcing How we're becoming carbon positive in our operations Our environmental management system Our eco-efficiency performance Responsible Sourcing Policy Investing for a sustainable future Code of Business Principles	G4-14 G4-EN8 G4-EN32 G4-EN33 G4-SO10

friendly		existing commitment to increase our use of recycled plastic in packaging by	Independent Assurance	
technologies.		at least 25% by 2025. Our longstanding aim has been to develop a closed loop system; One that would allow us to continue to provide the price and convenience of sachets to consumers while tackling the environmental issues associated with their use. We have had a major breakthrough in this regard. We have launched a new technology to recycle sachet waste. We have developed this technology, called CreaSolv® Process, with the Fraunhofer Institute for Process Engineering and Packaging IVV in Germany.	PwC's Independent Limited Assurance Report 2017 Unilever Basis of Preparation 2017	
		We are founding members of the CDP (formerly Carbon Disclosure Project) Supply Chain Leadership Collaboration. CDP aims to increase companies' disclosure of their GHG management plans and impacts, and to encourage them to put reduction plans in place. CDP's supplier programme has a global reach and involves businesses collaborating through their supply chains.	Protecting our forests Global climate action The New Climate Economy: Global Report	
		We are part of the Natural Capital Coalition and we working to advance work in this area, through the WBCSD and Natural Capital Project amongst others. We are promoting the involvement of suppliers of both agricultural and non-agricultural based raw materials in the CDP programme. This represents a global standard approach for disclosure of GHG management plans and performance. We believe that involvement in the CDP programme is of intrinsic value to our suppliers and we encourage their participation.	Responsible Business Partner Policy	
	Criterion 10: The COP describes effective management systems to integrate the environmental principles	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), as well as our Consumer Safety Policy. They must comply in a manner that also recognises, and is consistent with, local legislation. Lifecycle assessment (LCA) is one of a number of techniques we use to help us understand the impacts of our products on the environment. We conduct LCAs on our existing products and ingredients to help identify improvement opportunities, to improve data quality and relevance to our studies.		

Our environmental management systems are designed to achieve continuous improvement. They are based on, and compatible with ISO 14001.

We require all suppliers to comply with our Responsible Sourcing Policy, which requires suppliers to conduct their business in a manner which embraces sustainability and reduces environmental impact. Our mandatory requirement is that suppliers are environmentally compliant with all necessary legal permits, but the policy expects them to proceed towards best practice. We are willing to apply more stringent criteria than those required by law when we believe this to be appropriate.

Within our own operations, our approach is to deliver tools, techniques and awareness, and share best practice directly with those people responsible for reducing the environmental impact of our manufacturing operations. Much of our progress has been achieved through good manufacturing practices at our factories. We continue to promote this through an environmental roadmap that includes an awareness-raising programme called Simple Solutions.

Our successful eco-efficiency projects are known as 'Proud Practices'. These evolved from our Smarter Greener Living campaign, which began in 2013, and aim to involve as many people in our factories as we can in improving our eco-efficiency. We found that a practice from one factory can – in many cases – be easily replicated elsewhere. This helps to speed up the delivery of environmental benefits and provides inspiration to generate new ideas, helping us to reduce our environmental impact.

Many of our employees have sustainable business ideas. Factory teams can apply for investment for these via our Small Actions Big Difference fund. Ideas are evaluated on the basis of environmental benefit and financial return. In 2017, we invested €43 million in energy, CO₂ and water projects.

Criterion 11:

The COP describes effective monitoring and evaluation mechanisms for environmental stewardship We use a number of metrics to assess our environmental impacts across the value chain covering: greenhouse gas (GHG) emissions, water, waste and sustainable sourcing.

Eco-efficiency data is used to track performance, set targets and identify the best opportunities to drive reductions in each of our key indicators.

Many of our manufacturing sites also make use of real-time eco-efficiency data. This is collected through automated systems – known as measurement, monitoring and targeting (MM&T) systems. This helps our manufacturing sites to better track their performance and identify reduction opportunities.

Environmental auditing programmes have been implemented within each region to help sites achieve continuous improvement in environmental performance.

At least once a year, all operating units conduct a review of their environmental business risks and their compliance with corporate policies. They also conduct a continuous self-assessment of their operating controls. These exercises are summarised in a Positive Assurance letter that is sent to our Corporate Risk Committee each year.

Our environmental policy requires that we audit our compliance with legislation and Unilever Standards and investigate all environmental safety incidents in order to prevent recurrence

A selection of our environmental metrics is independently assured by PwC.

Anti-Corruption	Management Po	licies & Procedures		
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti- corruption	Unilever has a zero-tolerance approach to bribery in any form: it is committed to being a no-bribe business and eradicating any practices or behaviours in this regard. This zero-tolerance policy extends to Unilever employees, contractors, third parties, new acquisitions 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. Our core values - Integrity, Responsibility, Respect & Pioneering - are enshrined in our longstanding Code of Business Principles (CoBP) and 24 Code Policies. These also underpin the Unilever Sustainable Living Plan's 3 Big Goals: Improving Health & Well-being, Reducing Environmental Impact & Enhancing Livelihoods. Our CoBP & Code Policies define minimum mandatory standards of behaviour for Board directors and employees globally, including JVs where we have management control. They go significantly beyond complying with laws and regulations. The Code Policies were refreshed and relaunched in 2016 and are published both externally and internally. Specific Code Policies Address Countering Corruption, Discrimination, Confidentiality of Information, Antitrust, Money Laundering, Insider Trading and Environment, Health and Safety. The Code Policies are also distilled into a 'Winning with Integrity' booklet for non-managers, translated into multiple languages. Countering corruption continues to be a focus area in 2018 and we continue to deploy mandated interactive training capsules across the business to all employees such as Gifts and Hospitality, Conflicts of Interest and Anti-Money Laundering.	Code of Business Principles Our values & principles Responsible Sourcing Policy Advancing human rights in our own operations Advancing human rights with suppliers & business partners Our Responsible Sourcing Policy in action Responsible Business Partner Policy	G4-56 G4-57 G4-58
		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 our Sanctions standard.

Unilever are committed to working with others who share our values and seek to operate to the same standards as we do. Both our suppliers and distributors are prohibited through mandatory compliance with our Responsible Sourcing Policy and Responsible Business Partner Policy from all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by a Business Partner.

Criterion 13:

The COP describes effective management systems to integrate the anticorruption principle

Unilever is a founding signatory of the United Nations Global Compact (UNGC): as a Board member (and incoming Vice-Chair) CEO Paul Polman actively helps drive global efforts to combat bribery. Realising UNGC Principle 10 (regarding corruption in all its forms) is a core focus for us. To foster dialogue on best practices, Business Integrity representatives are active in key external platforms, notably as successive 2017 and 2018 cochairs in the Responsible Business Conduct and Anti-Bribery Taskforces of the B20. The Chief Business Integrity Officer (CBIO) established and chairs a new Chief Compliance Officer peer group for European multinationals. Unilever also takes part in the Business Integrity Network of Transparency International UK and regularly contributes to policy updates such as the recent update of their Adequate Procedures guidance for business. UL are a member of the World Economic Forum (WEF) Partnering Against Corruption Initiative (PACI) and the new platform created by the Bingham Centre for the Rule of Law to further contribute to collective business efforts to fight corruption in all its forms.

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 and audits). We also actively monitor regulatory developments and participate in conferences to share, learn and adopt best practices.

The Chief Legal Officer (CLO) is responsible for the strategy implementation of the full compliance programme. She is supported by a CBIO who was

included in the Ethisphere 2016 Attorneys Who Matter list. The CBIO's team is part of Unilever's legal function, giving Unilever dedicated expert resource to embed a compliance culture and make Unilever more agile in identifying & mitigating compliance risks. The BI organisation features 5 dedicated experienced regional BI Directors who oversee BI work in North America, Latin America, Europe, Asia & Russia/Africa/Middle East: reporting to the CBIO, they are supported by a BI Officer for each country, including dedicated team members in geographic "hot spots" to drive operational excellence.

The CLO chairs the Unilever Global Code & Policy Committee (GCPC), which oversees compliance globally including related policies & standards, and reports to the UL Leadership Executive (ULE) to the Audit & Corporate Responsibility Committees of the Board of Directors. We have a global process for speaking up about actual or potential CoBP breaches. Employees are encouraged to raise CoBP breaches via internal channels: line manager, local BI Officer, member of the local BI Committee or email directly to the ULE. SMEs or Legal business partners may also be informed of concerns.

To foster dialogue on best practices in ABC, Unilever partners with external organisations on intercompany benchmarking exercises. We actively participate in IBE, DJSI and TI exercises and recently were ranked second across the entire TI submission.

We are also actively engaging with AIM Progress to drive collective action.

We partner with Maplecroft for detailed indices of compliance risk by country and we have historically partnered with PwC to review our third-party compliance programme for external validation and recommendations to build into our 2017-2020 Roadmap. Further, Unilever's risk assessment methodology builds on UN Global Compact, OECD, Transparency International and external advisor PwC's best practice.

Criterion 14:

The COP describes

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 Business Integrity Officer, member of the local Business

effective Integrity Committee or email directly to the Unilever Executive. SMEs or monitoring Legal business partners may also be informed of concerns. and UL provides external channels for employees and third parties to evaluation confidentially log concerns through a dedicated web portal or 24-hour tollmechanisms free hotline. A dedicated helpdesk covers guestions about CoBP compliance for the so issues can be discussed to pre-emptively find solutions that avoid integration of breaches. anti-Potential CoBP and Code Policies breaches are monitored by country-based corruption senior management, supported by the local Business Integrity Officer with oversight from five dedicated and experienced regional Legal Directors who report to the CBIO. Breaches are tackled through to a local Business Integrity Committee unless senior executives are involved (in which case the CLO and CBIO 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. In 2017, BI closed a total of 1,654 incidents with 709 confirmed breaches across all areas of our CoBP, including Countering Corruption. In 2017 we issued 284 written warnings (36 with a downgrade in individual performance

rating), initiated legal action in 3 cases and dismissed 279 employees. We disclose this information publicly. The number of issues raised per 1,000 employee and substantiation rates benchmark well against industry average,

pointing to ongoing employee willingness to report concerns.

June 2018

Scope: Taking Action in Support of Broader UN Goals and Issues	Criterion 15: The COP describes core business contributions to UN goals and issues	We are signatories to Business for Peace, a platform of over 130 leading companies from 37 countries dedicated to catalysing collaborative action to advance peace. Companies who join Business for Peace commit to paying heightened attention to the implementation of the UN Global Compact Ten Principles in high-risk and conflict-affected areas, take action to advance peace, either individually or in collaboration with others, and annually communicate on our progress.	UN Sustainable Development Goals Working with others on Human Rights Engaging with our stakeholders	G-15 G-16
	Criterion 16: The COP describes strategic social	We are a founding signatory to the UN Global Compact (UNGC). This sets out commitments for business in relation to human rights, labour, the environment and anti-corruption. We have pledged to uphold these principles across our business. Our CEO Paul Polman is the incoming Vice Chair of the UNGC and a long-standing member of the Board. We are active participants in the Action Platforms.	Transformational change	
	investments and philanthropy	In January 2016 Paul Polman helped co-create the Business and Sustainable Development Commission (Business Commission). The Commission brings together international leaders from business, labour, financial institutions and civil society to show how mainstreaming development can spark		
	Criterion 17: The COP describes advocacy and public policy engagement	unprecedented business opportunities. In January 2017, the Business Commission published its flagship report "Better Business, Better World", which identified 60 hot spot with a potential to create \$12 trillion of value every year by 2030, if we aligned business opportunities with the SDGs. The BSDC has now closed its doors, but Unilever continues to be an active member of the resulting initiative on Blended Finance, Food and Land Use and the World Benchmarking Alliance.		
	Criterion 18: The COP describes partnerships	In addition, Paul Polman was a member of the UN High Level Panel on the Post-2015 agenda, for which we 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 coordinated the 'Business Manifesto' to		

and collective action

which the UNGC has provided input – a call to arms of 23 companies in support of the SDGs, which were adopted by world governments in 2016.

In January 2016, Paul Polman was invited by the then-UNSG Ban Ki-Moon to join the UN Secretary-General's SDG Advocacy Group. Mr Polman is one of two business voices on the Group.

We are members of UNGC's Human Rights Working Group, Business for the Rule of Law Committee, CEO Water Mandate and Caring for Climate Initiative. We are also members of 16 UNGC local networks in a number of countries including the Netherlands, Vietnam, Zambia, Romania, South Africa, Turkey, Myanmar, Mozambique, Ghana, Chile, Indonesia, Sri Lanka, Singapore, Argentina, Colombia, Kenya and the UK. We are actively increasing our membership of UNGC local networks.

In July 2013, we endorsed the Women's Empowerment Principles, a collaboration between UNGC and UN Women. We are implementing these across our business, as well as taking steps to increase women's rights and economic inclusion in our supply chain. We have also given our support to UNGC's Business for Peace Platform and the Food and Agriculture Principles.

Unilever partner with global organisations Oxfam, Save the Children, PSI, World Food Programme and UNICEF to help reach our ambitious goal of helping 1 billion improve their health and well-being. In addition to our focus on water, sanitation and hygiene (WASH), we are also investing in livelihoods, sustainable sourcing and women's empowerment. Our partners in these areas include: Acumen, Clinton Giustra Enterprise, the Ford Foundation, and the Global Alliance for Improved Nutrition (GAIN).

In supporting the 2030 Agenda for Sustainable Development, we worked with a diverse range of organisations to campaign for a holistic water goal (SDG6), including measurement of handwashing with soap facilities. We helped establish the WASH4Work coalition, which aims to mobilise greater business action to address water, sanitation and hygiene (WASH) challenges in the workplace, in communities where workers live and across supply chains. We are now looking to support countries in implementing SDG6, with

a particular focus on promoting behaviour change as a means of realising the benefits of improved facilities.	
We believe that Unilever should play an active role in shaping legislation and regulations that enhance positive social and environmental outcomes. We have an advocacy team that works together with other stakeholders to bring about changes in public policy in key areas of health and sustainability.	

Corporate Sustainability Governance and Leadership					
Scope: Corporate Sustainability Governance and Leadership	Criterion 19: The COP describes CEO commitment and leadership	The Unilever Leadership Executive (ULE), led by our Chief Executive Officer, monitor implementation and delivery of the USLP. Sustainability criteria are built into our senior executive remuneration procedure.	Our sustainability governance Investor relations: Our corporate governance Our strategy for	G4-1 G4-2 G4-34	
	Criterion 20: The COP describes Board adoption and oversight	Governance of our conduct as a responsible corporate citizen is provided by our Boards' Corporate Responsibility Committee. Our USLP Steering Team (USLP ST) includes nine of our 13 Unilever Leadership Executive (ULE) members, including our Chief Marketing & Communications Officer (chair); Chief R&D Officer; Chief Supply Chain Officer; and four Category Presidents, and is responsible for approving new USLP targets and monitoring progress. The Board's Corporate Responsibility Committee (CRC) monitors USLP progress as one of its allocated focus risks. We have introduced The Unilever sustainable progress index, a long-term incentive which helps to secure long-term value creation by decoupling our growth from our environmental impact, while increasing our positive social impact. To avoid over-focus on any one element of the USLP, the progress index is an assessment made by the Board's Compensation Committee taking into account progress towards the targets in our reported USLP scorecard.	Sustainable growth About our strategy Engaging with our stakeholders Working with others on human rights Embedding sustainability Annual Report & Accounts 2017		
	Criterion 21: The COP describes stakeholder engagement.	To succeed in our purpose of making sustainable living commonplace, we need to engage and work in partnership with a wide range of stakeholders. These include: investors; customers and consumers; suppliers; governments, regulators and legislators; NGOs; civil society; and others in the business environment, including peer companies.			
		We seek to understand the issues of concern to our stakeholders and to respond openly and transparently to any questions raised about our			

products and the way we run our business. We publish our responses to some of these questions in the What Matters to You section of our online Sustainable Living Report.

Both our USLP ST and CRC benefit from the insights of the USLP Council—a group of external specialists in corporate responsibility and sustainability who guide and critique the development of our sustainability strategy. The USLP ST and CRC benefit from the insights of the USLP Council—a group of external specialists who guide and critique our sustainability strategy. In 2018, the USLP Council will be refreshed with a new group of members.

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.

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	In addition to ensuring compliance with our Code Policies, an important way in which Unilever monitors our due diligence – particularly in high-risk or conflict areas is through Human Rights Impact Assessments (HRIAs) which include on-site visits by third party experts who engage and consult right-holders and other stakeholders for example the HRIA in Myanmar which we undertook in 2016. The results of HRIA's enable us to adapt our due diligence and sourcing decisions. We continue to monitor working conditions or our tea plantations including ensuring that any issues of harassment are addressed, focussing on the prevention of incidents through increased education and awareness, strengthening the management team, and improving the grievance and reporting procedures. Progress is continually monitored through monthly reviews with the VP of Tea Procurement and Operations and bi-monthly meetings with the Chief Procurement Officer. In addition, we are working with UN Women to externally review the measures we have implemented and to extend our Safety Framework in Kenya and Assam, India. In countries with a particularly high risk of forced labour, we are rolling out awareness raising and capacity building for our employees and suppliers.	Kericho tea estates Our values & principles Working with others on human rights Human Rights Report 2015 Human Rights Progress Report 2017	
	Annex 2: The COP describes policies and practices related to the company's government relations in high-	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.		

	k or conflict- ected areas			
deso stak eng stra inve acti com risk	nex 3: The COP scribes local keholder gagement and ategic social restment civities of the mpany in high- k or conflict- ected areas	Unilever are 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 selfesteem. Since 2012, we have 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. Our partners also serve as our primary beneficiaries in times of disaster and emergency relief. We have spent £88,717,427 so we can provide critical resources expeditiously when there is the greatest need and on longer-term projects to help rebuild communities.	Ready to respond to disasters & emergencies	

^{*}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