THEME 1: COMMITMENT AND GOVERNANCE

1.1 Commitment

The company:

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

Additional disclosure:

Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain

1.2 Supplier Code of Conduct

The company's supplier code of conduct:

(1) requires suppliers to respect the ILO core labor standards, which include the elimination of forced labor;
(2) is easily accessible from the company's website;
(3) is updated regularly, following internal review and input from external stakeholders;
(4) is communicated to the company's suppliers; and
(5) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in-line with the company's supply chain policies addressing forced labor and human trafficking.

Additional disclosure:

Please note that, as in the introduction to our Responsible Sourcing Policy, we work with suppliers who share and commit to the principles of our Responsible Sourcing Policy within their own business and across their extended supply chain to be able to affect change.

1.3 Management and Accountability

The company:

(1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labor and human trafficking; and
(2) has tasked a board member or board committee with oversight of its supply chain policies that address forced labor and human trafficking.

Additional disclosure:

Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain

The company:

(1) trains all relevant decision-makers within the company on risks and policies that address forced labor and human trafficking;
(2) trains its first-tier suppliers on risks and policies that address forced labor and human trafficking and discloses the percentage of first-tier suppliers trained; and
(3) engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labor and human trafficking to their own supply chains and/or trains suppliers below the first tier on such policies.

Additional disclosure:

Additionally: We continue to prioritise the training of our suppliers including co-hosting supplier training events in India and Brazil in 2019 through our membership of Aim Progress; working with the Fair Labour Association in Turkey to train agricultural suppliers on responsible recruitment practices of migrant workers and our on-going work (including supplier engagement and capacity building) through our membership of the Consumer Goods Forum Initiative: Human Rights – Working to end Forced Labour. Training of agricultural suppliers is also part of the certification process. We are also members of the Business for Inclusive Growth Coalition and participants in three working groups including the Human Rights Working Group which focus includes the eradication of forced labour.

1.4 Stakeholder Engagement

To fully understand and address working conditions in sourcing countries, companies need to engage with potentially affected groups and local stakeholders such as trade unions, worker organizations, or local NGOs—in addition to suppliers. Furthermore, as forced labor risks tend to be systemic in nature, collaboration with other companies, for example, to engage policy makers to strengthen labor legislation, is needed to address forced labor in supply chains.

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

(1) providing at least two examples of engagements on forced labor and human trafficking with stakeholders such as policy makers, worker rights organizations, or local NGOs in countries in which its first-tier suppliers and suppliers below the first tier operate; and
(2) actively participating in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.

Additional disclosure:

In 2019 we partnered with the Fair Labor Association to improve recruitment and employment practices for seasonal migrant agriculture workers in Turkey through a multi-stakeholder initiative.

https://www.fairlabor.org/our-work/special-projects/project/harvesting-future

We participated in events with the Leadership Group for Responsible Recruitment (LGRR), the Consumer Goods Forum, Humanity United and the Responsible Labor Initiative (part of the Responsible Business Alliance which we joined in 2019) in Myanmar and Malaysia. In our engagement with governments, labour agencies and civil society, we support calls for a professional, ethical and respectful recruitment industry and safe and secure recruitment corridors.

THEME 2: TRACEABILITY AND RISK ASSESSMENT

2.1 Traceability and Supply Chain Transparency
The company discloses:

(1) the names and addresses of its first-tier suppliers;
(2) the countries of its below-first-tier suppliers (this does not include raw material suppliers);
(3) the sourcing countries of at least three raw materials at high risk of forced labor and human trafficking; and
(4) at least two types of data points on its suppliers' workforce (e.g., the number of workers, gender or migrant worker ratio, or level of unionization per supplier).

Additional disclosure:

Additionally, we published our direct sourcing Unilever Tier 1 and Tier 2 Coca supplier list:


The interactive map below shows sourcing locations and projects around the world with our suppliers and partners:


2.2 Risk Assessment

Risk assessment involves evaluating the potential that a company has (by virtue of who its suppliers are and where they are located) of being linked to forced labor and human trafficking. Risk assessment is a process that is carried out in addition to and outside of auditing. It helps identify potential forced labor risks as well as actual impacts that may be hard to detect through audits. This process may involve engaging local stakeholders, labor rights experts, independent sources, and assessing risks associated with specific raw materials, regions, or groups of workers such as migrant workers.

The company discloses:

(1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks or assessments that focus specifically on forced labor risks; and
(2) details on forced labor risks identified in different tiers of its supply chains.

Additional disclosure:

Please see details of work we are undertaking with our transport suppliers to better understand the working conditions of transporters who can be vulnerable to exploitative working conditions particularly through sub-contracting (beyond our direct supplier):


THEME 3: PURCHASING PRACTICES

3.1 Purchasing Practices

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

(1) is taking steps toward responsible raw materials sourcing;
(2) is adopting responsible purchasing practices in the first tier of its supply chains, which include planning and forecasting;
(3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts); and
(4) discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labor and human trafficking.

Additional disclosure:

Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain

3.2 Supplier Selection

The company:

(1) assesses risks of forced labor at potential suppliers before entering into any contracts with them and discloses details on the outcomes of this process.

Additional disclosure:

We ensure that all our agreements with suppliers (inclusive of MSAs, UPAs, CTCs, POs) and distributors and customers (including DOs*), to the extent required by our internal controls, include contract clauses that specify that the supplier must acknowledge adherence to our RSP or RBPP (Responsible Business Partner Policy) as a condition of engagement


* Master Service Agreements, Unilever Purchase Agreements, Commercial Terms Contracts, Purchase Orders, Distribution Orders.

3.3 Integration into Supplier Contracts

The company:

(1) integrates the ILO core labor standards, which include the elimination of forced labor, into supplier contracts;
(2) discloses the percentage of suppliers whose contracts include such standards; and
(3) requires its suppliers to integrate such standards into contracts with their own suppliers.

Additional disclosure:

Please note that, as in the introduction to our Responsible Sourcing Policy, we work with suppliers who share and commit to the principles of our Responsible Sourcing Policy within their own business and across their extended supply chain to be able to affect change.

4.1 Recruitment Approach

The company:

(1) has a policy that requires direct employment in its supply chains;
(2) requires employment and recruitment agencies used by its suppliers to respect the ILO core labor standards, which include the elimination of forced labor; and (3) discloses information on the recruitment agencies used by its suppliers.

**Additional disclosure:**

*Please note that, as in the introduction to our Responsible Sourcing Policy, we work with suppliers who share and commit to the principles of our [Responsible Sourcing Policy](#) within their own business and across their extended supply chain to be able to affect change.*

**4.2 Recruitment Fees**

According to the ILO, workers should not be charged directly or indirectly, in whole or in part, any fees for recruitment or related costs (such as costs for training, medical tests, or travel).

The company:

(1) requires that no worker in its supply chains should pay for a job—the costs of recruitment (i.e., recruitment fees and related costs) should be borne not by the worker but by the employer ("Employer Pays Principle"); and (2) takes steps to ensure that such fees are reimbursed to the workers and/or provides evidence of payment of recruitment-related fees by suppliers if it discovers that fees have been paid by workers in its supply chains.

**Additional disclosure:**

*Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain*

**4.3 Monitoring and Responsible Recruitment**

The company:

(1) takes steps to ensure employment and/or recruitment agencies used by its suppliers are monitored to assess and address risks of forced labor and human trafficking; and (2) provides details of how it supports responsible recruitment in its supply chains (e.g., by collaborating with stakeholders to engage policy makers to strengthen recruitment standards).

**Additional disclosure:**

*Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain*

**4.4 Rights of Workers in Vulnerable Conditions**

Migrant workers and other workers in vulnerable conditions are at a higher risk of being in forced labor, and additional steps are needed to ensure their rights are respected. Conditions which render workers vulnerable may include characteristics such as gender or age and external factors, including workers' legal status, employment status, economic conditions, and work environment (such as isolation, dependency on the employer, or language barriers).

The company:
(1) takes steps to ensure migrant workers in its supply chains understand the terms and conditions of their recruitment and employment and also understand their rights;
(2) takes steps to ensure its suppliers refrain from restricting workers’ movement, including through the retention of passports or other personal documents against workers’ will; and
(3) discloses at least two outcomes of steps it has taken to ensure respect of the fundamental rights and freedoms of supply chain workers in vulnerable conditions (those articulated in the ILO core labor standards, which include the elimination of forced labor).

Additional disclosure:

*Please see further information relating to work with migrant workers in the tomato supply chain in Turkey.*

*We are also working to improve the conditions for workers in the waste-picking industry including creating new business models to enable the payment of a living wage.*

**THEME 5: WORKER VOICE**

5.1 Worker Engagement

The company:

(1) takes steps to ensure its supply chain policies that address forced labor and human trafficking are communicated to workers in its supply chains;
(2) takes steps to ensure that relevant stakeholders engage with and educate workers in its supply chains on their labor rights and/or supports worker-led efforts on labor rights education;
(3) provides evidence of the positive impact of worker engagement in its supply chains; and
(4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.

Additional disclosure:

*Please refer to section 1.5 of our Responsible Sourcing Policy as this states the requirement of our suppliers to have clear and effective training to embed a culture of integrity and risk mitigation and that these guidelines are readily available to workers.*

5.2 Freedom of Association

The company:

(1) works with independent local or global trade unions to support freedom of association in its supply chains;
(2) discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labor rights agreement with trade unions or worker organizations;
(3) takes steps to ensure workplace environments in which its suppliers’ workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association; and
(4) provides at least two examples covering different supply chain contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers such as migrant workers (e.g., by taking action where suppliers impede workers’ rights to freedom of
association and/or collective bargaining or by engaging policy makers to improve respect for such rights).

Additional disclosure:

Unilever is committed to ensuring that throughout our worldwide operations workers can freely exercise their internationally recognised rights and their rights to union membership and collective bargaining without fear of retaliation, repression or any other form of discrimination.

Unilever’s joint memorandum on union rights with the IUF

Please note this also refers to our extended supply chain. “Unilever recognizes its obligation to act to ensure that these rights are similarly respected by enterprises and their subcontractors providing products, operations and/or services to Unilever, as set out in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights”.

5.3 Grievance Mechanism

The company:

(1) takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company’s supply chains is available to its suppliers' workers and their legitimate representatives;
(2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers;
(3) takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism;
(4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism; and
(5) provides evidence that the mechanism is available and used by workers below the first tier in its supply chains.

Additional disclosure:

Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain

THEME 6: MONITORING

6.1 Monitoring Process

To improve implementation of its supply chain policies, conditions at supplier level can be monitored in different ways. This could include specialized audits to detect forced labor at higher-risk suppliers or worker-driven monitoring (i.e., monitoring undertaken by independent organizations that includes worker participation and is guided by workers’ rights and priorities).

The company has a supplier monitoring process that includes:

(1) non-scheduled visits;
(2) a review of relevant documents;
(3) off-site interviews with workers;
(4) visits to associated production facilities and related worker housing; and
(5) steps to ensure that suppliers below the first tier are monitored.

Additional disclosure:

*Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain*

6.2 Monitoring Disclosure

The company discloses:

(1) the percentage of suppliers monitored annually;
(2) the percentage of unannounced monitoring visits;
(3) the number or percentage of workers interviewed; and
(4) information on the qualification of the monitoring organization used and/or the use of worker-driven monitoring (i.e., monitoring undertaken by independent organizations that includes worker participation and is guided by workers’ rights and priorities); and
(5) a summary of findings, including details regarding any violations revealed.

Additional disclosure:

*Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain*

**THEME 7: REMEDY**

7.1 Corrective Action Plans

The company discloses:

(1) a corrective action process for its suppliers and potential actions taken in cases of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision;
(2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, or spot-checks;
(3) potential consequences if corrective actions are not taken; and
(4) a summary or an example of its corrective action process in practice.

Additional disclosure:

*Nothing additional to our previous disclosure or information already taken into consideration by Know the Chain*

7.2 Remedy Programs / Response to Allegations

A. If no allegation regarding forced labor in the first or lower tier of a company’s supply chains has been identified and disclosed by a third party(ies) in the last three years, the company discloses:

(1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking; and
(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers’ workers.

Additional disclosure:
Our grievance mechanism in palm is part of a grievance eco-system which should start with workers being able to access remedy directly with their employer. If that fails and the supplier is a certified agricultural supplier then, this should also provide a route for remedy. Our grievance mechanisms, which we have strengthened, can be accessed by third parties in our value chain or those who support/represent them. We will use our leverage to engage where other options have not been successful.

B.1. If one or more allegations regarding forced labor in the first or lower tier of a company's supply chains have been identified and disclosed by a third party(ies) in the last three years, the company discloses:

(1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking;
(2) that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s);
(3) outcomes of the remedy process in the case of the allegation(s); and
(4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

B.2. If one or more allegations regarding forced labor in the first or lower tier of a company's supply chains have been identified and disclosed by a third party(ies) in the last three years, and the company denies the allegation, the company discloses:

(1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking;
(2) a description of what actions it would take to prevent and remediate the alleged impacts; and
(3) that it engages in a dialogue with the stakeholders reportedly affected in the allegation or requires its supplier(s) to do so.

NON-SCORED DISCLOSURE

Target Setting
The company discloses measurable and time-bound targets to address forced labor in its supply chains.
Yes/No. Please provide details.

The company reports on progress towards achieving previous targets on an annual basis.
Yes/No. Please provide details.

Our Responsible Sourcing Policy (RSP) and Programme has the target to source 100% of our procurement spend through our Responsible Sourcing Policy. A fundamental principle and requirement of our RSP is that work is conducted on a voluntary basis.

Reporting Legislations
UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.
Yes. Please provide link to a publicly available statement.

**UK Modern Slavery Act Transparency Statement 2020**

California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

Yes. Please provide link to a publicly available statement.

**Unilever supports the goals of the California Transparency in Supply Chains Act of 2010.** Our Code of Business Principles, Human Rights Report and our supplier Responsible Sourcing Policy embody our commitment to the human dignity and labor rights of our employees and suppliers.

**Due Diligence on Third-Party Products**

Where a company—in addition to own branded products—sells third-party food and beverage products, the company discloses how it assesses and addresses forced labor risks related to third-party food and beverage products.

Yes/No. Please provide details.

**Use of Commodities Which May Be Produced Using Forced Labor**

Please provide a full list of commodities present in your supply chains, or alternatively indicate for each of the commodities below whether it is present in your supply chains. Note where a company does not provide this information, KnowTheChain will review the company’s website as well as third party sources to identify relevant information.

Details of our agricultural sourcing can be found here:


- Beans (green, soy, yellow)
- Brazil Nuts / Chestnuts
- Cattle
- Chile Peppers
- Cocoa
- Coffee
- Corn

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• Fish
• Palm oil
• Peanuts
• Rice
• Sesame Shrimp
• Sugarcane
• Tomatoes
• Wheat

Presence of Migrant Workers in Supply Chains

Yes/No. Please provide details.

We discuss migrant workers in our global supply chain here and in our 2020 UK Modern Slavery Act Supply Chain Transparency Statement.