

**Company Name** Unilever  
**Industry** Agricultural Products (Supply Chain and Own Operations)  
**Overall Score (\*)** 75.4 out of 100

Theme Score	Out of	For Theme
9.2	10	A. Governance and Policies
23.2	25	B. Embedding Respect and Human Rights Due Diligence
9.6	15	C. Remedies and Grievance Mechanisms
11.0	20	D. Performance: Company Human Rights Practices
13.8	20	E. Performance: Responses to Serious Allegations
8.6	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company indicates that 'we are committed to respecting all internationally recognised human rights as relevant to our operations' [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: OECD: The Human rights policy statement states that 'we follow the OECD Guidelines for Multinational Enterprises' [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: ILO Core: The human rights policy states that 'we prohibit discrimination, forced, trafficked, and child labour and are committed to safe and healthy working conditions and the dignity of the individual. Also the right to freedom of association and collective bargaining and effective information and consultation procedures'. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> <li>Met: Explicitly list All four ILO for AG suppliers: The responsible sourcing policy includes explicit commitments and guidelines in relation to each ILO core. With respect freedom of association and collective bargaining, the document says: 'The rights of workers to freedom of association and collective bargaining are recognised and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.' [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As explained above, the human rights policy states that 'we prohibit discrimination, forced, trafficked, and child labour and are committed to safe and healthy working conditions and the dignity of the individual. Also the right to freedom of association and collective bargaining and effective information and consultation procedures'. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In addition to the statement on the human rights policy, the Company describes its commitment to health and safety in the code of conduct [Code of Business Principles and Code Policies, 04/2019: <a href="http://unilever.com">unilever.com</a> &amp; Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The responsible sourcing policy includes commitments and guidelines in health and safety [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Respect land ownership and natural resources: The human rights policy statement states that 'we recognise the importance of land rights. We are committed to the principle of free, prior and informed consent, and support its implementation by national authorities' [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Respecting the right to water: Although the Company devotes a section on its water activities to provide safe drinking water, recognising that water is a basic human right, and has objectives on water use, no evidence found of a formal commitment to respect the right to water. The Company, however, is a signatory to the CEO water mandate and reports periodically to the initiative, which is a proxy for this indicator. [CEO Water Mandate: <a href="http://ceowatermandate.org">ceowatermandate.org</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The responsible sourcing policy includes a commitment on land rights of communities, including indigenous peoples. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: FPIC for all: In addition to the Human Rights Policy statement, the Human Rights report states 'We are committed to the principle of free, prior and informed consent (FPIC): the principle that a community has the right to give or withhold its consent to proposed project that may affect the lands it customarily owns, occupies or otherwise uses'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Respecting the right to water: As indicated above, the Company is a signatory to the CEO water mandate and regularly reports to the initiative. Also, 'in July 2010, through Resolution 64/292, the UN General Assembly explicitly recognised the human right to water and sanitation. It acknowledged that safe and clean drinking water and sanitation are essential to full enjoyment of life and all human rights. Unilever respects these rights by ensuring that we operate our business in a way that fulfils the human right to water, as defined by the UN Human Right to Water Policy. We've also signed the World Business Council for Sustainable Development WASH Pledge to ensure access to Water, Sanitation and Hygiene (WASH) in all our factories, plantations and workplaces'. [CEO Water Mandate: <a href="http://ceowatermandate.org">ceowatermandate.org</a> &amp; Health &amp; hygiene- web, 14/08/19: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The responsible sourcing policy includes a commitment to land rights including mandatory requirements such as 'a zero land grabbing policy is implemented'. The Sustainable agricultural code includes 'mandatory', 'expected', and 'leading' practices for suppliers. In relation to water, is 'expected' that 'if no licence or permit is required, there must be evidence that current rates of abstraction are acceptable to relevant authorities', and is a 'leading practice' that 'water harvesting and withdrawal are monitored, and systems are in place to try, as far as practicable, to meet the needs of local communities, other water users, as well as wildlife and ecosystems in the catchment'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Sustainable agriculture code: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry –	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's rights: The Human rights policy statement indicates that 'women are integral to our business model and growth ambitions. We seek to manage and grow socially responsible businesses where women participate on an equal basis. We believe that women's rights and economic inclusion are priorities to win long-term. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a> &amp; Opportunities for women on website: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	people's rights (AG)		<ul style="list-style-type: none"> <li>• Not met: Expects suppliers to respect these rights: The Company is signatory to the Women Empowerment Principles. In the context of land rights, the responsible sourcing policy states that advancing to good practice includes that 'the right of women to land ownership and access to land is recognised'. Also, according to its Responsible Sourcing Policy, 'there is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based (...) gender, gender identity, (...), sexual orientation, marital status, pregnancy, dependants, disability (...) is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination. The Company provides evidence in relation to audit requirements. However, CHRB is looking for a policy that requires its suppliers to commit to respect women's, children's or migrants rights. [Advancing HR suppliers &amp; business partners, 14/08/2019: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The Company indicates on its website that 'we are a proud member of the UN Global Compact and a signatory to the Women's Empowerment Principles, which we aim to implement throughout our operations'</li> <li>• Not met: Expecting suppliers to respect these rights: Although In the context of land rights, the responsible sourcing policy states that advancing to good practice includes that 'the right of women to land ownership and access to land is recognised'.</li> </ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states in its Human Rights Policy statement that 'we recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks'. It also states that 'we believe that working through external initiatives and partnerships, for example with other industry, NGO, trade union, supplier and other business partners, is often the best way to address shared challenges'. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder design engagement: In the human rights report, the Company indicates that in addition to day-to-day interactions between its leadership teams and union representatives in the factories, it has formal consultations with unions. 'We conduct a biannual consultation forum with the IUF (International Union of Food, Agricultural Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations) and IndustriALL, a face-to-face engagement between our senior industrial relations leaders and IUF leadership'. 'Worker representatives discuss local and global rights issues which then can be addressed by our senior team; these discussions also give us a platform to communicate our own business context, and ne policies and programmes that impact workers. We discuss rights issues in our own operations, in joint ventures, and involving our suppliers. We also focus on our key commodities such as palm oil and tea, and particularly on working conditions for women in those sectors'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
A.1.5	Commitment to remedy	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Human rights statement indicates that 'we place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms.'. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Met: Collaborating with other remedy initiatives: The company indicates how it collaborates with initiatives that provide access to remedy such as OECD. In this specific case, there was a complaint by the by the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) regarding the company's own operations in India and in Pakistan. A further complaint was submitted by the Turkish transport union TUMTIS in 2008. 'The unions referred their complaints to the OECD's National Contact Points in the UK and Turkey for investigation. We agreed to cooperate fully with the OECD process to seek resolution of the cases'. The company then explains their course of action. Moreover, it states that 'We know that human rights abuses exist in the sectors and markets in which we operate – and at times, in our own value chain. These</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>abuses are unacceptable. We're committed to respecting human rights, which means we need to understand the issues and where they occur. In line with the UN Guiding Principles, if through our business operations we have caused or contributed to a negative human rights impact, then we will address this, including by working with our suppliers and other business partners or through wider initiatives'. [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Work with AG suppliers to remedy impacts: The responsible sourcing policy states that, following a reported breach by a supplier, 'if remediation is required, the supplier will devise and inform Unilever of their corrective action and implementation plans and timeline to effectively and promptly resolve the breach'. The Company reports an example of a supplier breach communicated through the grievance mechanism (on health and safety), and how the Company engaged with the supplier to implement a corrective action (the fail had led to a death). [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Zero tolerance attacks on HRs Defenders (HRDs): On its website, working with others section, the Company states that 'we recognise increasing pressure and insecurity for human rights defenders, including trade unionists. We do not tolerate threats, intimidation, physical or legal attacks against human rights defenders in relation to our operations'. [Working with others on human rights: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments: The Human Rights Defenders (HRD) Policy of the Roundtable on Sustainable Oil (RSPO), which Unilever is a member of, states that 'RSPO adopts a zero-tolerance policy against any threats, intimidation and reprisal against HRDs in the course of his/her work especially where the same involves direct actions by RSPO members which includes causing harm through its own acts, omissions or negligence'. However, although Unilever has some of its suppliers which are members of the RSPO, it is not clear that it applies to all its suppliers. CHRB is looking for a company's policy commitment(s) which also expects its suppliers to committing to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders in relation to its operations. [Human Rights Defenders (HRD) Policy, 24/09/2018: <a href="http://rspo.org">rspo.org</a> &amp; RSPO - Roundtable on Sustainable Palm Oil - Unilever, 16/08/19: <a href="http://rspo.org">rspo.org</a>]</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Company's code of business principles includes the Group's policies on human rights and is prefaced and signed by the CEO. [Code of Business Principles and Code Policies, 04/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Company indicates in the Human rights policy statement that 'our work in this area is overseen by the Unilever Chief Executive Officer' and that 'Board-level oversight is provided by the Corporate Responsibility Committee of Unilever PLC'. [Human rights policy statement: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: The Company indicates that the CEO signed up to the Evening Standards Stop Slavery Pledge and the CEO participated in an expert panel. 'Paul Polman, the CEO of Unilever, emphasised the importance of governments, companies and individuals working together to tackle modern slavery'. In addition, the Company co-signed the WBCSD CEO Guide to Human rights. [Evening Standard modern slavery panel: <a href="http://standard.co.uk">standard.co.uk</a> &amp; WBCSD - CEO Guide to Human Rights, N/A: <a href="http://wbcسد.org">wbcسد.org</a>]</li> </ul>
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Corporate Responsibility Committee holds quarterly meetings and 'the Committee's agenda covers Unilever's Code of business principles, alongside litigation, occupational and product safety, the USLP [Unilever Sustainable Living Plan, which includes women, water, sustainable sourcing, fairness in the workplace, etc.]'. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Sustainable Living Plan on website: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Examples or trends re HR discussion: The Company indicates that 'In 2017 the Committee placed special emphasis on third-party compliance and was briefed</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>on how Unilever's programmes seek to ensure business integrity'. It also indicates that 'At each meeting the Committee reviews an analysis of investigations into non-compliance with the Code'. Finally, safety is also reviewed at each meeting. Particularly on 2017 performance, the Committee reports that 'Improved standards, enhanced qualifications for employees and a Safety to Win programme for partners all contributed to safer manufacturing sites in 2017. Unilever's approach which is based on the identification of risk, resulted in a 46% reduction in process safety incidents versus 2016'. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The long-term remuneration of the Management Co-Investment Plan (MCIP) for the CEO includes as performance measure against 'Unilever sustainability progress index' which will be based in an assessment of progress against the targets of the USLP scorecard. USLP scorecard includes sourcing 100% of procurement from suppliers meeting the mandatory requirements of the sourcing policy, reducing workplace injuries and accidents and indicators showing improvement in opportunities for women. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: At least one key AG HR risk, beyond employee H&amp;S: See above</li> <li>• Met: Performance criteria made public: The Annual report indicates that 'It is the Committee's intention that management should be assessed against the progress they make on the USLP as a whole, rather than selected components of it. Accordingly, each year the Committee will determine a numerical rating for the previous year's MCIP Sustainability Progress Index in the range of zero to 200%, with 100% representing on-target performance'. It also states that 'Performance at thresholds results in no matching shares being awarded, target performance results in an award of 1.5 matching shares, up to a maximum award of 3x matching shares'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions</li> <li>• Met: Senior responsibility for HR: The latest human rights report refers to the 2015 report, where it is stated that the CEO's work is 'supported by the Unilever Leadership Executive - including the Chief Supply Chain Officer, Chief Human Resources Officer, Chief Marketing and Communications Officer, Chief Legal Officer- as well as the Chief Sustainability Officer and the Global Vice President for Social Impact'. In the 2017 report it is indicated that the Company 'expanded the role of the Global Vice President for Social Impact and moved it into our Supply Chain function'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: As indicated in the Human rights report, 'The Integrated Social Sustainability team drives Unilever's Human Rights strategy and advocacy. The team focuses on our eight salient human right issues [...] and operates in the following way: Within integrated Social Sustainability, Social Accountability focuses on working with our suppliers with the aim of creating truly social [...] sustainable supply chains'. 'Human Rights Stewardship focuses on strategic human rights issues: helping the business address issues which we know are endemic in global supply chains. Social Impact operationalises human rights works on the ground'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: See above [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.2	Incentives and performance management	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: The Annual report states that 'For 2,872 senior management employees, incentives have been simplified to include fixed pay, a bonus percentage of fixed pay and long-term management co-investment plan (MCIP) linked to financial and USLP performance'. The USLP is the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sustainability programme. USLP scorecard includes sourcing 100% of procurement from suppliers meeting the mandatory requirements of the sourcing policy, reducing workplace injuries and accidents and indicators showing improvement in opportunities for women. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: At least one key AG HR risk, beyond employee H&amp;S: As indicated above, USLP scorecard includes sourcing 100% of procurement from suppliers meeting the mandatory requirements of the sourcing policy, reducing workplace injuries and accidents and indicators showing improvement in opportunities for women. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria made public: As indicated above, a fixed pay, a bonus percentage of fixed pay and long-term management co-investment plan (MCIP) linked to financial and USLP Performance are the incentives for 2,872 senior management employees. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: Sustainability is included within the general company risk management: 'There can be no assurance that sustainable business solutions will be developed and failure to do so could limit Unilever's growth and profit potential and damage our corporate reputation'. In this context, the Company explains the main issues that are being handled (through the sustainable living plan) including health, sustainable sourcing, fairness in the workplace, water, and opportunities for women. [Annual report and accounts, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Audit Ctte or independent risk assessment: The Company discloses a document that includes the objectives and processes of the Sustainability plans including human rights (fairness in the workplace, opportunities for women, etc.) that were assured by an external auditor. The measures included for external review include review of policies and codes, training, risk assessments, remediation and mitigation. [Basis of USLP measures selected for independent assurance: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates that 'training and support are essential if we are to embed respect for human rights across Unilever. We run a wide range of training on compliance and integrity, and all our employees are trained on respect for human rights every three years'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder: The Company indicates that 'As well as addressing the salient issues we've identified, we know we need to keep working to make sure they are still relevant. We recognise that rights-holder engagement is an on going process, and we want to increase our direct engagement with stakeholders in addition to engaging with credible representatives. In 2018, we started a review of our salient human rights issues, carrying out internal and external consultations with rights-holders and their representatives. In 2018, we held an initial consultation in London which we are following up with regional consultations. Our first regional consultation was held in Kenya with a wider Africa focus. In 2019 we are continuing with consultations in Asia, the Americas and Europe'. Although the Company has made its website accessible in different languages and has translated its policies, it not clear how it reaches local communities and other potentially affected stakeholders. It provides different cases of stakeholder engagement, however, no evidence found of specific examples to make stakeholders aware of the Company's policies on human rights (communicating the code to affected stakeholders so they are aware of the Company's policies). [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: How policy commitments are made accessible to audience: The company indicates that 'In 2018 we formed a working group with the International Union of Food Workers and International Transport Worker's Federation to explore how we could work together to address potential human rights abuses and potentially raise the floor industry-wide. A particular challenge is that many abuses happen several tiers up the supply chain through multiple levels of sub-contracting, which is common practice in the transport industry. Together, we created a guidance document, specific to transportation issues, to accompany the Responsible Sourcing Policy (RSP). Within Unilever, we launched a pre-tender</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			questionnaire relating to policies, procedures and workforce composition sent to all transporters in our recent European transport tender'. However, this looks for evidence of communication to other affected stakeholders than suppliers, which are assessed in B.1.4.b [Advanced manufacturing centre construction site newsletter, 05/2017: <a href="http://business-humanrights.org">business-humanrights.org</a> & Modern Slavery Statment 2019, 03/2019: <a href="http://unilever.com">unilever.com</a> ]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring AG suppliers to communicate policy down the chain: The Company indicates the following: 'We are committed to applying our RSP [Responsible Sourcing Policy] to our entire supply chain [...] By the end of 2016 approximately 6,000 suppliers had joined our RSP programme, representing 67% of our procurement spend'. The Company consulted with some suppliers, including giving them the opportunity to raise questions, and as a result it developed the RSP 2017. In addition, the Company has a 'Responsible Business Partner Policy' which 'consists of the same RSP fundamental principles' and it is 'focused on our downstream distribution partners. Now deployed in over 104 countries'. The responsible sourcing policy expects the following: 'The supplier has in place a code of conduct or responsible sourcing policy for its direct suppliers, consistent with the requirements of this RSP. In addition, there is a process to communicate this to all of its direct suppliers and to monitor compliance by these direct suppliers'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company indicates in the Human Rights report that 'Procurement contract include obligations with respect to Responsible Sourcing. Commitment to the RSP [Responsible Sourcing Policy] is attained through the Pledge for the lowest-risk suppliers or through the completion of a self-assessment questionnaire. Those suppliers representing higher risk will be required to undergo a third party audit'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Including on AG suppliers: As indicated above, the Responsible sourcing policy, suppliers have to have in place a code of conduct or responsible sourcing policy for its direct suppliers. However, it is not clear whether it requires suppliers to cascade the contractual or other binding requirements down the supply chain'. No new information regarding the issue was found in the update. [RSP Update 2018, 03/04/19: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.5	Training on Human Rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Human rights report states that 'Training and support are essential if we are to embed respect for human rights across Unilever. We run a wide range of training on compliance and integrity, and all our employees are trained on respect for human rights every three years. This training is supported by our new internal 'Integrated Social Sustainability' online hub which contains our key policy publications and reports, and best practice guidance documents'. The Company also provides more information on specific training for senior managers. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Trains relevant AG managers including procurement: The Company indicates that in September and October 2017 it held a series of internal webinars on forced labour focused on our Human Resources, Supply Chain, Procurement, Business Integrity and Customer development employees. The first series helped employees recognise forced labour, understand how and where workers are vulnerable to it and what to do if it is identified. The second series focused on temporary and migrant labour including the use of ethical recruitment agencies and the abolition of worker fees'. The Company also reports specific training on human rights for senior managers. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Met: Both requirements under score 1 met: See above [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.6	Monitoring and corrective actions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: Regarding the Company's own operations, it states the following: We are continuing to align our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>own factories with our Responsible Sourcing policy, using independent external on-site audits determined from a risk-based perspective. In 2016 we assessed 11 Unilever manufacturing sites, with other assessments continuing. All our factories will be integrated into the same monitoring system as our suppliers'. The Company also describes how it monitors its supply chain, as described below.</p> <ul style="list-style-type: none"> <li>• Met: Monitoring AG suppliers: In relation to the supply chain, the Human rights report indicates that 'Alongside our URSA (Understanding Responsible Sourcing Audit) standard, we now recognise SMETA (Sedex Members Ethical Trade Audit) audits'. It also indicates that 'suppliers who represent the lowest risk, volume and value with Unilever, will be managed through a 'de minimis' approach based on suppliers' self-declarations. All other companies not included in these approaches will continue to go through the risk based full self-assessment and auditing requirements of our programme'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Met: Describes corrective action process: The Company indicates that 'within our own operations we track reported issues through code breaches, grievances reporting and engagement with worker representatives, supported by regular training and monitoring'. 'Our Procurement function monitors compliance levels and prioritises where intervention is needed, working with suppliers to ensure effective remediation. We track and verify that corrective action plans have been implemented within the agreed timelines: this requires confirmation from the auditor that the action has effectively addressed the relevant non-conformance. For the most serious key incidents, we have a more active, direct participation in agreeing the corrective actions with the supplier and following up on these'. It also discloses a chart with the audit process and explains timescales for remediation. The Company discloses the total number of incidents in 2015 and 2016 by key salient human rights issue and by country. The most severe level of non-compliance is classified as 'key incidents' and there were 888 in 2015 &amp; 2016. They are broken down by topic. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Example of corrective action: The Human rights report describes different examples. One case refers to a Saudi Arabian supplier withholding passports: 'Our Social Accountability team spoke to the supplier and they agreed to provide the workers with a letter, in the workers' own language, to ensure the management and workers understand and agree that providing their documents was on a voluntary basis and only for safe keeping. A process was then put in place to ensure that any worker could have their documents returned to them (for any reason) within 24 hours, and without requiring the request to be routed through their line manager'.</li> <li>• Not met: Discloses % of AG supply chain monitored: The company indicates that 'in 2018 over 20,000 suppliers completed the next step in the process - to become fully registered in our system. This now includes all suppliers evaluated as representing higher risks'. However, no evidence on percentage of supply chain monitored. [RSP Update 2018, 03/04/19: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects AG selection of suppliers: The Company indicates that 'both raw material and finished goods suppliers and service suppliers are subject to our Positive Assurance and Supplier Qualification process. Suppliers are thereafter subdivided according to risk (based on externally sourced matrices) which determines the need to undergo an audit by a third party or only to complete the self-assessment questionnaire. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: HR affects on-going AG supplier relationships: The Human rights report states that 'suppliers who are able to complete the qualification process, or those that are unable to close out no-conformances, follow through our escalation, review and sign-off procedure. For such cases, we look at the mitigating circumstances for that supplier, their plans to close any shortcomings, and the time-frame needed in order to consider ongoing supply. The supplier's circumstances are reviewed formally by the Procurement Business Integrity Committee, who either approve on-going sourcing or enforce the de-listing of the supplier. Where a serious human rights issue is identified in an existing supplier, efforts are focused on effective remediation of non-conformances with e supplier within a reasonable time-frame, before considering de-listing'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Working with AG suppliers to improve performance: The Company indicates that uses its policy to engage suppliers in working towards achieving leading practices. We expect suppliers to work with us and to make progress over time from the 'mandatory requirements' onward to 'good' and 'best practices'. We review and update this guidance regularly, working with suppliers and external experts to share examples of best practice'. The Human rights report contains examples of working to improve performance, for instance, in relation to wages: 'we have worked with suppliers to help them better understand the legal requirements, including the requirement that minimum wage cannot be paid in kind. Since some suppliers were incorrectly including items such as subsidise food and shoes in minimum wage calculations, we worked to ensure suppliers corrected calculations' [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: In the 2017 Human rights report the Company refers to the 2015 report in relation to how it engages with stakeholders on human rights. In that report it describes the 'right-holder and stakeholder engagement' which include dialogue with suppliers: 'where our suppliers feel able actively to raise issues so we can work together to share best practices and respond to challenges as they emerge. 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'. One of the key issues is sexual harassment in the supply chain, where company reports engagement carried out with workers. [Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Frequency and triggers for engagement: In the 2017 Human rights report the Company refers to the 2015 report in relation to how it engages with stakeholders on human rights. That report states that as part of identification process of its salient human rights, it has a process to identify potentially affected stakeholders. The 'process began with an internal, cross functional workshop facilitated by SHIFT (non-profit centre for business and human rights practices). Following the UN Guiding Principles approach, we looked at a range of potential human rights impacts resulting from the types of activities we are involved in, and prioritised those likely to be the most severe were they to occur, based on how grave the impacts to the rights-holder could be, how widespread they are and how difficult it would be to remedy any resulting harm'.</li> <li>• Met: Workers in AG SC engaged: The Company reports engagement carried out with workers in the supply chain including consultation, surveys and initiatives developed in collaboration with affected stakeholders.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them: The Company reports on the analysis of views of workers in the supply chain affected by cases of harassment. It also indicates that 'we discuss some of the issues that stakeholders have raised with us on our website in What matters to you'. However, no disclosure of a summary of input given by stakeholders (and how it was taken into account) on human rights issues was found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Update of our Progress to address our salient human rights issues, 03/04/19: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: As described below, the Company has a clear global system.</li> <li>• Met: Identifying risks in AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: In the 2017 human rights report, the Company refers to the 2015 report in relation to the process it follows: 'this process began with an internal, cross functional workshop facilitated by Shift. Following the UN Guiding principles approach, we looked at a range of potential human rights impacts resulting from the types of activities we are involved in, and prioritised those likely to be the most severe were they to occur, based on how grave the impacts to the rights-holder could be, how widespread they are and how difficult it would be to remedy any resulting harm'. [Human rights report 2015: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: In consultation with stakeholders: The Company indicates that 'we drew on previous conversations with external bodies such as the World Economic Forum Human Rights Global Agenda Council, the Global Social Compliance Programme, AIM-PROGRESS, the UN Global Compact and others at the core of policy implementation'. The process also demanded 'integration of an understanding of the perspectives of affected stakeholders and verification with expert stakeholders of the salient issues identified'. [Human rights report 2015: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: In consultation with HR experts: See above</li> <li>• Met: Triggered by new circumstances: The Company indicates that it has created new guidance on mergers and acquisitions to help engaging in potential mergers during due diligence. The reasons for this guidance include that 'companies we partner with or acquire may have different human rights policies and processes in place that our own' and 'we may inherit human rights issues through acquisitions, including the responsibility to provide remedy to people harmed'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Explains use of HRIAs or ESIA (inc HR): The Company indicates that it monitors its due diligence through HRIA 'which include on-site visits by third-party experts who engage and consult rights-holders and other stakeholders. The results of the HRIAs enable us to adapt our due diligence processes and sourcing decisions. In 2016 it commissioned a HRIA for own operations and value chain in Myanmar in order to identify impacts on 'local right-holders, including workers, their families and other community members'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company indicates in the 2015 Human rights report that human rights impacts assessments are 'core to our efforts'. 'In assessing human rights impacts, we include data from other external sources such as governments, international agencies and risk organisations, which help us monitor changes to human rights situations in the countries where we operate. We can then adapt our due diligence processes and sourcing decisions accordingly'. Finally, it indicates that the priorities for the next years [in 2015] it will continue to focus on key geographical areas carrying out further HRIAs including Myanmar. The Company reports the assessment in Myanmar in the 2017 human rights report. The Company discloses which are its salient risks and the human rights report focus on how it deals with them. [Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Public disclosure of salient risks: In addition to disclosing its salient issues (discrimination, fair wages, forced labour, freedom of association, harassment, health and safety, land rights and working hours) and how it acts in relation to them, in different operations, the Company also reports on assessments carried out in specific locations. In Myanmar, the HRIA 'uncovered regular patterns of discriminatory practices within some suppliers in our extended supply chain'. In addition, during the assessment of the harvesting of palm sugar activity, 'children were found to be working alongside their parents as they prepared palm juice, whilst palm sugar tree climbers were using unsafe homemade ladders to pick the fruit'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company has published Human Rights Report where it explains its general approach and devotes a section for each of the 8 salient issues they identified. For each salient human rights issue, the Company has disclosed actions taken, initiatives/project implemented, progress where relevant and some actual examples including both owned operations and supply chain. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Including in AG supply chain: As above, the system in the Human Rights report covers suppliers.</li> <li>• Met: Example of Actions decided: As above, the company has provided different examples for each issue on its Human Rights report</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: The Human rights report indicates that 'the ability to track and monitor issues is a vital part of measuring progress in</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	effectiveness of actions to respond to human rights risks and impacts		<p>remediation and addressing grievances’. ‘Within our own operation we track reported issues through code breaches, grievances reporting and engagement with worker representatives, supported by regular training and monitoring’. ‘To assist tracking in our extended supply chain, in 2017 we created an Integrated Social Sustainability Dashboard giving the number of non-conformances for each fundamental principle of the RSP’. It then uses information on salient issues hotspots ‘allowing use to prioritise, build guidance produce webinars, and support regions where the need is greatest’. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Lessons learnt from checking effectiveness: The Company describes several examples of lessons learned in its Human Rights Report and Oxfam's study of Unilever in Vietnam. [Labour rights in Vietnam (Unilever's progress and systemic challenges): <a href="http://oxfam.org">oxfam.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: The Company demonstrates through their human rights reports how it has a process to identify human rights risks and impacts, as shown in B.1.1. [Human rights report 2015: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Comms plan re assessing risks: The Company demonstrates through its human rights reports how it has assessed risks including through HRIAS and discloses the human rights salient issues it faces. It devotes a section to explain each issue. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Comms plan re action plans for risks: The Company describes in its human rights report its general approach and devotes a section for each salient issue, including actions taken, initiatives/projects implemented and examples including both owned operations and supply chain. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Comms plan re reviewing action plans: The Company indicates in the human rights report that ‘within our own operations we track reported issues through code breaches, grievance reporting and engagement with worker representatives, supported by regular training and monitoring’. To assist tracking supply chain it created a Sustainability Dashboard which allows using information on salient issues hotspots, ‘allowing prioritising, build guidance, produce webinars, and support regions where the need is the greatest’. It also provides examples of lesson learned in the human rights report and the Oxfam’s study of Unilever in Vietnam. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Labour rights in Vietnam (Unilever's progress and systemic challenges): <a href="http://oxfam.org">oxfam.org</a>]</li> <li>• Met: Including AG suppliers: All the information mentioned in the different processes described above cover both company's owned operations and supply chain. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: The Company has a palm oil grievance procedure. It discloses a chart containing all the steps followed and how the grievance raiser is invited to participate and notified of outcomes. Although no evidence found on responses to specific human rights concerns in this context, the Company provided evidence of how it has responded to concerns in Kodaikanal, India, in relation to safety issues regarding an old thermometer factory, and how it has responded to a case of allegations of sexual harassment of female workers in Kericho. [Engaging our palm oil suppliers: <a href="http://unilever.com">unilever.com</a> &amp; Kericho Tea States: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Ensuring affected stakeholders can access communications: Although the Company provides evidences of how it has responded to specific human rights concerns, no details found on how affected stakeholders and their representatives were able to access to any communications or updates in relation to the cases. The company discloses a Palm Oil Grievance Tracker which is available online. it's not clear how it progress and outcomes are communicated to affected stakeholders in the field. [Kericho Tea States: <a href="http://unilever.com">unilever.com</a> &amp; Palm Oil Grievance Tracker, 17/06/2019: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states that 'we offer both internal and external channels for raising concerns confidentially via our 24/7 hotline or our online reporting tool' The Company also discloses 'In 2017 we switched to a new third-party service provider for our hotline and online reporting solution'. The Company also states that it provided training and organised global awareness programmes on how concerns can be raised. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Grievance website (independent): <a href="http://app.convercent.com">app.convercent.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: In the Human rights report the Company indicates that it investigated and closed 606 reports received. Of these 218 were confirmed breaches. All these were related to the 'Respect, Dignity and Fair Treatment Code Policy' which is the part of the Company's code covering human rights. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Code of Business Principles and Code Policies, 04/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The website is available in 49 different languages. [Grievance website (independent): <a href="http://app.convercent.com">app.convercent.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: The Human rights report states that 'external parties, including each one of our suppliers and their workers in our extended supply chain, can also use or global Code Breach process. We encourage suppliers to contact us if they are concerned about any aspect of our Responsible Sourcing Policy.' [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: As indicated in the Human rights report, 'external parties including each one of our suppliers and their workers in our extended supply chain' can also use the global Code Breach process. It also indicates in the 2015 Human Rights report that grievance mechanisms in certification programmes provide 'a channel for workers to address and seek remedy to non-conformance issues'. The Company, for instance, discloses its grievance procedure for 'sustainable palm oil'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Improving visibility of our supply chain: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The public website containing grievance channels is available in 49 languages. [Grievance website (independent): <a href="http://app.convercent.com">app.convercent.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems: Evidence found in the RSP refers only for suppliers' workers to complain.</li> <li>• Met: AG supplier communities use global system: The channel to make complaints is publicly available and the Company indicates in the Human rights report that external parties can use the global Code Breach process. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Grievance website (independent): <a href="http://app.convercent.com">app.convercent.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages users to create or assess system: The Company indicates that 'We analyse results of investigations, market assessments and audit findings to identify trends and opportunities for improvement. We act on feedback from users of our Code breach channels in order to improve the system. We engage with thought leaders and peer companies to understand and aspire to best practices'. [Business integrity, 13/05/2018: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Response timescales: Although the Company indicates that it aims 'to complete investigations within 60 days' no further details found, such as time to acknowledge receipt, updates to the complainant, etc. [Business integrity, 09/08/2018: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: How complainants will be informed: The Company indicates that 'Business Integrity Committees for relevant geographies oversee investigations into</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>alleged breaches of the Code of Business Principles, and local aspects of the implementation of Unilever's third party compliance programme. Members typically include the Country Chairman, and Heads of Finance, Human Resources, Supply Chain, Customer Development and Legal'. 'Our local Business Integrity Officers assist our markets and local Business Integrity Committees in carrying out these responsibilities'. No further evidence found of the procedures for informing the complainant. [Business integrity, 09/08/2018: <a href="http://unilever.com">unilever.com</a> &amp; Investigating Code Breaches, n/a: <a href="http://unilever.com">unilever.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Escalation to senior/independent level: The Company states that every country Chairman is accountable for business integrity in their market. Business Integrity Committees (which typically include the Country Chairman). 'Our local Business Integrity officers assist our markets and local Business Integrity Committees in carrying out these responsibilities Complaints and concerns from both employees and third parties at both the individual and community level can be escalated to senior levels of the business as necessary'. [Business integrity, 13/05/2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company's code includes a commitment to 'ensure that anyone who raises concern, or highlights potential or actual breaches, receives support and respect and there is no retaliation against them'. [Code of Business Principles and Code Policies, 04/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The channel is operated by a third party and the Company also confirms on its website that 'we offer a variety of internal and external reporting solutions for raising concerns in confidence, anonymously if required'. [Business integrity, 13/05/2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Met: Expects AG suppliers to prohibit retaliation: The Responsible Sourcing Policy requires from suppliers that 'Grievance mechanism channels are widely communicated and guarantee the confidentiality of any complainant (if so desired) and prohibit retaliation [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Won't impede state based mechanisms: The Company states that 'we encourage individuals and communities to raise any concerns with us directly. On occasions where they feel they aren't able to do this, we would never seek to impede access to state-based judicial or non-judicial mechanisms for those who feel human rights have been impacted, and would aim to co-operate as required with competent authorities in investigating or adjudicating alleged human rights impacts' [Advancing human rights in our own operations: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Will work with state based or non judicial mechanisms: The Company indicates that it support the OECD Guidelines for MNEs 'which provide voluntary principles and standards for responsible business conduct in a variety of areas, including employment and industrial relations'. Then it describes the OECD's conciliation process and reports a couple of cases of complaints that were referred to the OECD contact points. [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Example of issue resolved (if applicable): The Company reports four cases that were brought to its attention by the IUF (international Union of Food, Agricultural...), included the topics discussed. 'The unions referred to their complaints to the OECD's National Contact Points in the UK and Turkey for investigation. Each of these cases was resolved. Since these cases we have implemented a range of action across our business, including the development of guidelines and training a review of our use of contract labour, and more dialogue with stakeholders' [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: The Company reports the cases of Kericho, Kenya, where there were allegations of 'sexual harassment of female workers'. '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'. The Company reports that it has focused on the prevention of incidents and in improving the grievance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and reporting procedures. It also discloses the work that has been doing since then in relation to this case. It also provides another example case. [Kericho Tea States: <a href="http://unilever.com">unilever.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: Following this particular case, improvement measures were implemented. Among other improvements, it reports that it revised the grievance process to improve the confidential ethics channel and all Kenyan, Tanzanian and Ugandan-based employees can choose to speak with a Kiswahili speaker. Since 2013 we have worked with the hotline service provider to improve the quality of reporting and the time taken to connect a caller to the appropriate language. It also indicates that carried out an independent survey to identify factors and conditions than enhance safety and that it has implemented the recommendations made following the survey 'resulting in a substantial improvement in the way sexual harassment issues are addressed'. Other improvements are also explained. [Kericho Tea States: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Approach to learning from incident to prevent future impacts [Update of our Progress to address our salient human rights issues, 03/04/19: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Evaluation of the channel/mechanism: The Company reports activities carried out to improve and prevent this type of situations. In the different Human rights reports it reports actions carried out and that reviewed the measures that it has implemented in Kenya since the 2013 to improve safety. However, no evidence found in relation to an evaluation of the effectiveness of the grievance processes/mechanisms. No new evidence found during latest revision. [Kericho Tea States: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays living wage or sets target date: The Company indicates that 'in 2016 we announced that we had set an ambition that none of our 169,000 direct employees would be below a living wage by 2020. In 2017 we had further reduced the number of our employees being paid below a living wage to 6,458 in 25 countries. We also brought forward or living wage ambition to 2018'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Describes how living wage determined: The Human rights report indicates that 'We have continued our work with the independent Fair Wage Network and use their global living wage database to monitor our own operations'. The process is described in the 2015 Human rights report where the Company indicates that it created a 'Framework for Fair Compensation'. To define fair wages it engaged with the 'Fair Wage Network' to conduct a review of entry-level wages in our factories against a variety of fair wages indicators [...] the next step is to set up independent benchmarks, identify gaps, address these gaps and establish a framework for fair compensation'. It also indicates that 'we recognise the critical role that collective bargaining agreements play in setting and promoting fair wages'. Finally, 'to guide our learning and engagement on this topic, we are collaborating with several experts, including Oxfam. We are also engaging with trade unions locally though the collective bargaining process'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Paying living wage: Although the Company shows improvements each year, including paying above living wage in employees in tea sector, and has brought forward its target to 2018, it has not achieved paying the living wage throughout the Company yet. The 'Update of our Progress to address our salient human rights issues' source shows that the company carries on the trend of improvement, but it still has not achieved paying living wages to all its employees. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Fairness in the workplace fair compensation, 09/08/2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Met: Definition of living wage reviewed with unions: The Company indicates that 'We compile annual status progress reports against the standards of our framework in each country, and where employees are identified as below the living wage benchmark, put remediation plans in place'. As indicated above, benchmarks are set in place with the Fair Wage Network and use their database to monitor how they are going. 'One of our focus areas is the need for more data relating to rural/agricultural living wage levels and we are discussing with the Fair Wage Network and certification organisations'. As indicated above, in engagement in this topic the company collaborates with several organisations, including trade unions through collective bargaining [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Human rights report 2015: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Living wage in supplier code or contracts: The Responsible sourcing policy (RSP) includes mandatory requirements and guidance to advance towards good and best practice. Guidelines include a 'living wage approach to fair compensation' which includes basics and discretionary income and 'A best practice fair compensation system is in place for all workers. This system 'regularly assesses and adjusts their pay according to the cost of living, basic needs, discretionary income, relevant market benchmarks and enterprise performance, and engages in regular social dialogue on compensation questions'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>Not met: Improving living wage practices of suppliers: The Company provides an example of working with suppliers in the tea industry that helped to narrow the gap between current wages by 20%. However, no evidence found in relation to a broader approach of work carried out with suppliers to improve their living wage practices. It states that will work with suppliers using and awareness-raising and capacity-building approach, although no evidence found on the actual work carried out. No new evidence found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provides analysis of trends demonstrating progress: The Company provides charts comparing non-conformances per salient issue and per country. One of the issues compared for the period 2015-2016 is 'fair wages'. However, given that it measures non-compliance cases, it is not clear whether it measures improvement towards living wage or cases of non-compliance with wage audit requirements. No new evidence found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Avoids business model pressure on HRs (purchasing practices)</li> <li>Not met: Positive incentives to respect human rights (purchasing practices): The Company indicates that sustainable certification allows farmers to sell their produce at premium price while ensuring they adopt sustainable agricultural and business practices and helps Unilever to secure more sustainable products (includes example of palm oil, tea, etc.). However, it is not clear whether the Company actively seeks purchasing practices to actively encourage its business relationships to act with respect for human rights. It provides an example an initiative carried out to improve the access of women to training &amp; skills through 'premium prices for suppliers who invest in farmer training and provide quality planting material, such as high-yield seeds'. But no evidence found on a wide approach to general purchasing practices in this sense.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Identifies suppliers back to manufacturing sites (factories or fields): The Company indicates that 'we are focused on making our supply chain transparent and traceable' and is committed to apply the RSP to the entire supply chain. In addition, the sustainable agriculture code includes as an expected requirement that 'suppliers must have a system in place to enable traceability back to the farm or field of origin'. [Sustainable agriculture code: <a href="http://unilever.com">unilever.com</a> &amp; Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why: The Company has a map of around 1,400 mills, and discloses details of all the mills locations and a list of its palm oil suppliers (without addresses). In relation to the importance of mapping this part of the supply chain, the Company indicates that ‘the palm oil supply chain is long and complex, with the palm oil changing hands many times before it reaches our factories. The fruit is grown on plantations where farmers sell their produce to middle men and agents. [...] Transparency and traceability are important as we can only effectively address the systemic issues associated with how palm oil is cultivated and produced – such as deforestation and human rights abuses – if we know exactly where the problems are’. In addition, Unilever defines itself as the ‘biggest buyer of tea across the world’. On its website, it has an interactive map that discloses tea producers across the world, the producer and selling marks. No evidence found, however, in relation to addresses in the case of tea suppliers. Also, no evidence found on whether the Company considers it discloses the map of the most significant parts of its supply chain, including how it defines that are the most significant parts. In order to award this indicator the Company needs to disclose both names and addresses of the supplier location, and indicate the reasons to consider these the most significant parts of its supply chain. In the case of tea, no evidence found of names and addresses being disclosed. [Improving visibility of our supply chain: <a href="http://unilever.com">unilever.com</a> &amp; UK Tea Transparency, 03/04/19: <a href="http://unilever.co.uk">unilever.co.uk</a>]</li> </ul>
D.1.4.a	Prohibition on child labour: Age verification and corrective actions (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company's code states that 'we will not use any form of forced, compulsory, trafficked or child labour'. Specifically on child, it says that Unilever companies must not 'use child labour, i.e. individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is higher'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Age verification of job applicants and workers: The Company indicates that requires all Unilever to conduct work on the basis of 'no employment of individuals under the age of 15 or under the local legal minimum working age or mandatory schooling age, whichever is the higher. Processes are in place to verify these requirements, for example the checking of the ages of job applicants and workers'. [Advancing human rights in our own operations: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified [Advancing human rights in our own operations: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The RSP establishes requirements for suppliers in relation to fight child labour: 'An employment policy is in place specifying the minimum age for employment, together with effective procedures and means of age verification to implement this policy'. In addition ‘responsible remedial measures are immediately implemented whenever any breach of that policy is identified’. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: How working with suppliers on child labour: The Company provides different examples of collaboration, including working with Rainforest alliance to promote and evaluate Sustainable Agricultural Standards that prohibit child labour, establishing alliance with a supplier and save the children to improve opportunities for children in vanilla farming communities, and supporting young workers with training and help to improve their practices and encourage them to work in the cocoa sector. However, in order to achieve this subindicator, evidence is needed of specific work carried out by the Company or on its behalf with suppliers to eliminate child labour and improve working conditions for young workers employed by suppliers. [Support vanilla farming communities (children): <a href="http://unilever.com">unilever.com</a> &amp; Financial and social literacy for young Cocoa Farmers: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: as above</li> <li>• Not met: Analysis of trends in progress made</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays workers in full and on time: The Company's framework for fair compensation covers 'our own direct employees'. It states that 'employees receive their compensation regularly, in full and on time'. In the 'Update of our Progress to address our salient human rights issues', it is stated that 'a key element of our work is our commitment to the "Employer Pays Principle" that no worker should pay for a job'. The company indicates that in 2018 it 'worked to develop the right level of oversight of our third-party labour agencies and brokers, checking that they are compliant with our Responsible Sourcing Policy which requires that workers should not be required to pay a fee in connection with obtaining employment (including The Company's framework for fair compensation covers 'our own direct employees'. [Framework for fair compensation, 12/2015: <a href="http://unilever.com">unilever.com</a> &amp; Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Payslips show any legitimate deductions: The Company's 'Framework for fair compensation', in relation the compensation being open and explainable states that 'employees have sufficient information to understand how their compensation package is calculated, what amounts to expect and how they will receive these amounts'. The document indicates that one of the fundamental reward principles is that 'all elements of reward will be Open, Fair, Consistent and Explainable'. [Framework for fair compensation, 12/2015: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company held a series of webinars. The second series included 'focused on temporary and migrant labour including the use of ethical recruitment agencies and the abolition of worker fees'. In addition, it indicates that in the context of the Consumer Goods Forum, it helped to create the 'Leadership Group for Responsible Recruitment, which focuses on promoting ethical recruitment', which has lead to 'progress towards removing the payment of recruitment fees across our business and extended supply chain'. Moreover, in its 'Understanding our Human Rights Impacts' text, it states that it 'worked to develop the right level of oversight of our third-party labour agencies and brokers, checking that they are compliant with our Responsible Sourcing Policy which requires that workers should not be required to pay a fee in connection with obtaining employment (including migrant workers or recruited workers supplied through an agency); that suppliers should be responsible for payment of all fees and expenses and; that workers are not required to pay deposits in relation to their employment. We continued work on improving the vetting process'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Update of our Progress to address our salient human rights issues, 03/04/19: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The RSP includes the following requirement: 'Workers should not be required to pay a fee in connection with obtaining employment (including migrant workers or recruited workers supplied through an agency). Suppliers should be responsible for payment of all fees and expenses. Workers are not required to pay deposits in relation to their employment'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: How working with suppliers on debt &amp; fees: The Company indicates that in the context of the Consumer Goods Forum, it helped to create the Leadership Group for Responsible Recruitment, which 'focuses on promoting ethical recruitment'. The outcomes include 'promotion of ethical recruitment practices' and 'progress towards removing the payment of recruitment fees across our business and extended supply chain'. The Company has carried out training with approximately 1,000 suppliers on 'eradicating forced labour and responsible management of migrant labour, including those in our extended supply chain'. One of the next steps will be to 'implement responsible recruitment best practices including the elimination of worker employment fees'.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made: Although the Company indicates that there has been 'progress toward removing the payment of recruitment fees across our business and extended supply chain', no further details found on trends showing performance. No new evidence found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.c	Prohibition on forced labour: Restrictions on workers (in own agricultural operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not retain documents or restrict movement: The Code states that Unilever companies must not 'use, or permit to be used, forced or compulsory or trafficked labour. We have a zero tolerance of forced labour'. The Company indicates that brokers and agencies are, as suppliers, covered by the Responsible sourcing policy, which states the following: 'workers have freedom of movement and are not confined to the supplier's premises, including dormitories or provided housing'; 'Workers are not required to surrender their identification papers. Where the retention of identification papers is legally required, arrangements are made to ensure that workers can access their identification papers, are not prevented from leaving the workplace and that their papers are returned immediately upon cessation of employment'. [Code of Business Principles and Code Policies, 04/2019: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How these practices are monitored for agencies, labour brokers or recruiters: The Company indicates that agents and brokers must align with the responsible sourcing policy. The Company provides the checklist for the responsible sourcing audit, which includes a specific checkpoint indicating that 'there is no retention by employer or employment agency of original identification papers and /or passports unless required by law. Where the retention of identification papers is legally required, there is a process to ensure that workers can access their identification papers, are not prevented from leaving the workplace and that their papers are returned immediately upon cessation of employment'. The company indicates that, in 2018, it 'worked to develop the right level of oversight of our third-party labour agencies and brokers, checking that they are compliant with our Responsible Sourcing Policy (PDF   8MB) (...) We continued work on improving the vetting process'. [Responsible sourcing audit checklist, 10/08/2018: <a href="http://unilever.com">unilever.com</a> &amp; Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The RSP includes the following requirements: 'Workers have freedom of movement and are not confined to the supplier's premises, including dormitories or provided housing'. 'Workers are not required to surrender their identification papers. Where the retention of identification papers is legally required, arrangements are made to ensure that workers can access their identification papers, are not prevented from leaving the workplace and that their papers are returned immediately upon cessation of employment'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: How working with suppliers on free movement: The Company reports examples of non-compliance cases and how they were resolved. Then it indicates that 'To respond to cases such as these we have provided suppliers with specific guidance regarding the retention of passports or other items of value'. 'The context varies between cases and there will not necessarily be a single best solution. We work directly with suppliers to find solutions that address the root cause and safeguard the fundamental principle of freedom of movement'. Finally, the Company had an interactive supplier event with 155 Turkish suppliers. Topics were selected from the key-non compliances found in the region and 'migrant labour was a focus of the training, reflecting conditions in Turkey. Tailored business integrity training was also delivered'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress: The Company provides detail of performance including number of non-compliances, specific issues and countries. In its Modern Slavery Act Transparency Statement, it indicates that 'one of the challenges we are finding in implementing the Employer Pays Principle is mapping the entire recruitment process of a worker from their home to destination country. Even if fees appear not to have been paid in the destination country, they could have been paid in the home country to both local and national recruiters. There are complex relationships between many suppliers, brokers and agents. Working collaboratively with a peer company, we have reached out to Impactt to help us map the recruitment journey of workers in our extended supply chain in Malaysia'. However, although the Company describes activities carried and the current situation of the issue, it is not clear which the trend/performance is. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The company indicates that the MOU (memorandum of understanding between Unilever, the IUF and IndustriALL Global Union, recognising the IUF and IndustriALL Global Union as the internationally representative bodies of unionised workers within our worldwide operations) underlines our commitment to ensure that throughout our worldwide operations workers can freely exercise their internationally recognised rights and in particular their rights to union membership and collective bargaining without fear of retaliation, repression or any other form of discrimination. We also recognise our obligation to act to ensure that these rights are similarly respected in our extended supply chain'. Also, 'in 2018, around 80% of our total workforce (blue- and white-collar) were covered by independent trade unions or collective bargaining agreements. Around 89% of our blue-collar workers were covered by an independent trade union or collective bargaining agreement'. [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a> &amp; Working with others on human rights: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining agreements: See above. [Working with others on human rights: <a href="http://unilever.com">unilever.com</a> &amp; Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met [Working with others on human rights: <a href="http://unilever.com">unilever.com</a> &amp; Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: FoA &amp; CB rules in codes or contracts: The RSP includes a commitment to respect freedom of association and the right to collective bargaining and that 'workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organisation'. It also indicates that 'workers know and understand their rights and feel confident to exercise them, at that no other worker or manager will impede them in the enjoyment of that right'. 'Managers, supervisors and guards are trained to respect each worker's right to associate freely'. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB: The company, in its document Signed Unilever Letter, states that 'Unilever is committed to ensuring that throughout Unilever's worldwide operations workers can freely exercise their internationally recognized rights and in particular their rights to union membership and collective bargaining without fear of retaliation, repression or any other form of discrimination. 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'. Moreover, in the webpage Understanding our human rights impacts, the company indicates that it 'created a new Guidance Document to accompany our Responsible Sourcing Policy specifically designed to address working conditions in the trucking industry'. It is not clear how of this document can improve their practices in relation to freedom of association and collective bargaining. Although the Company reports on actions made in cases of non-compliance and provides an example, evidence for this indicator requires working proactively with suppliers to improve performance, rather than actions to correct wrongdoings. No new evidence found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Met: Provides analysis of trends demonstrating progress: The Company provides comprehensive detail of performance including number of non-compliances, specific issues and countries for the period 2015-2016. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The Company reports Total Recordable Frequency Rate (0.89 accidents per 1 million hours worked). Trends reported for the period 1998-2017</li> <li>• Met: Fatalities disclosures: The fatal accidents chart report trends from 1998 and reports 1 fatal accident of an employee off site in 2017.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company states that it has a Vision Zero Strategy, i.e. zero: fatalities; injuries; motor vehicle incidents; process incidents; tolerance to unsafe behavior and practices. More specifically, it has the target of reducing by 2020 'the Total Recordable Frequency Rate (TRFR) for accidents in our factories and offices by 50% versus 2008.</li> <li>• Met: Met targets or explains why not: The Company reports that this has achieved 'over 50% reduction in TRFR achieved by 2017, down to 0.89 from 2.10 accidents per million hours worked in 2008.</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company includes health and safety policies, procedures, training, informing of dangers, training on what to do in case of incidents, etc. in the code for suppliers (Responsible Sourcing Policy). [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Injury Rate disclosures: The company states that it has, since 2017, two ways to make advancing human rights in our supply chain more impactful and efficient: 'through the concept of mutual recognition and the use of trusted monitoring systems'. However, no further information found on Injury Rate disclosures. [2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a> &amp; Advancing HR suppliers &amp; business partners, 14/08/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: The company states that it has, since 2017, two ways to make advancing human rights in our supply chain more impactful and efficient: 'through the concept of mutual recognition and the use of trusted monitoring systems'. However, no further information found on Lost days or near miss disclosures. [2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a> &amp; Advancing HR suppliers &amp; business partners, 14/08/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Fatalities disclosure: The company states that it has, since 2017, two ways to make advancing human rights in our supply chain more impactful and efficient: 'through the concept of mutual recognition and the use of trusted monitoring systems'. However, no further information found on Fatalities disclosure. [2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a> &amp; Advancing HR suppliers &amp; business partners, 14/08/2019: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on H&amp;S: The Company carries out capacity building with suppliers: 'As part of our capacity building with our suppliers we will also send our own Health &amp; Safety experts to advise, as we did in 2017 in Brazil following a serious health and safety incident. The impact of these interventions is the reduction of absence of tragic accidents and therefore the importance of ensuring remediation cannot be underplayed. Further safety committees at suppliers' facilities will be a focus in 2018'. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Provides analysis of trends demonstrating progress: The Company provides comprehensive detail of performance including number of non-compliances, specific issues and countries. However, no evidence found in relation to an analysis of trends in progress made. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Approach to identification of land tenure rights holders: The Company indicates that it has established a 'Land Rights Principles and Implementation Guidance', although no details found about it and whether it describes the process to follow in resettlements. The Company provides an example case (Rwanda) where the land was expropriated by the Government. The Company required that land acquisition and resettlement would be implemented following IFC performance standards 1 and 5. Unilever worked with the government and used external experts to verify that the resettlement action plan properly ensured that potentially affected persons and communities were identified and engaged, including through a risk-mapping plan and a socio economic survey focusing on vulnerable groups 'to ensure that no one in local communities is left worse off by the project'. However, a description of the process beyond an example is needed to meet indicator requirements. [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Approach to doing so if no recent land deals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works: Following the case above, the Company indicates that ‘new model villages with infrastructure were constructed by the Government, together with livelihood support programmes. Unilever gives priority for employment to people affected by the project. Due diligence around this work is ongoing and we’ve put in place a local Unilever Welfare Manager to work with communities and local authorities’. However, a description of the process beyond an example is needed to meet indicator requirements. [Understanding our human rights impacts: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Follows IFC5 in any state land deals</li> <li>• Not met: Describes approach if no recent land deals</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Rules on land &amp; owners in codes or contracts: The RSP states that ‘a zero land grabbing policy is implemented’. ‘Where applicable, due diligence is undertaken to uphold individual or indigenous peoples’ established rights to property and land’. In addition, there are guidelines indicating that ‘a system for due diligence is in place to uncover and disclose risks and impacts to communities related to land issues’. Finally, as good practice ‘impact assessments are conducted with full participation of affected communities and published in a format and language accessible to those affected communities. The assessment data is disaggregated by gender, national origin, tribe or caste’. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: How working with suppliers on land issues: In the context of audit findings the Company describes typical corrective actions. However, it is not clear how the Company works to improve general performance on this topic rather than correcting wrongdoings (it is only indicated that help put policies in place, but no further details found). The company also indicates that "we continue to work with these suppliers to explain the importance of land rights and to develop solutions to issues identified". However, no evidence of how it works with suppliers was found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Met: Provides analysis of trends demonstrating progress: The Company provides comprehensive detail of performance including number of non-compliances, specific issues and countries for the period 2015-2016. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.9.a	Water and sanitation (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action to prevent water and sanitation risks: The Company has signed the WBCSD Pledge for Access to Safe Water, Sanitation and Hygiene (WASH) in the workplace. ‘This means we have committed to implementing access to safe water, sanitation and hygiene for all employees in our manufacturing and non-manufacturing sites that are under our operational control. The Pledge aligns with our hygiene and occupational health standards’. It indicates that it has integrated Pledge requirements into its standards for safety, health and environment reporting. It also reports that ‘even in water-stressed locations, the cost of buying water is often low and does not reflect its availability or its true value to our business or to local communities’. ‘To address this, we place additional value on water where it is stressed to drive greater internal investment’. [Sustainable water use in our manufacturing operations: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: The Company acknowledges that water scarcity and declining water quality are threats to water security for local communities in areas in which it has factories. ‘So we are taking action to protect water quality and help ensure the long-term security of water supplies. Many of these projects are developed in partnership with community groups and local government, and support the SDGs, specifically SDG 6, ensure access to water and sanitation for all’. In this context, in India, it’s implementing the ‘Phrabat factory volunteering programme’ which key areas include water conservation and health &amp; hygiene, and is being implemented in seven manufacturing locations. However, no evidence found in relation to specific targets. The Company also indicates that it identifies sites in areas of water stress and adopts contextual approach to internal water targets, establishing more stringent targets in water stressed areas. However, no details found of targets for these areas being established considering water use of local communities and other users in the vicinity. [Sustainable water use in our manufacturing operations: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Reports progress and shows trends in progress made: No evidence found of specific targets for sites considering water use by local communities and other users in the vicinity, and reporting against these. [Sustainable water use in our manufacturing operations: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Rules on water stewardship in codes or contracts: The Sustainable agricultural code includes ‘mandatory’, ‘expected’, and ‘leading’ practices for suppliers. In relation to water, it is ‘expected’ that ‘if no licence or permit is required, there must be evidence that current rates of abstraction are acceptable to relevant authorities’, and is a ‘leading practice’ that ‘water harvesting and withdrawal are monitored, and systems are in place to try, as far as practicable, to meet the needs of local communities, other water users, as well as wildlife and ecosystems in the catchment’. [Sustainable agriculture code: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: How working with suppliers on water stewardship issues: The company indicates that ‘Water scarcity and climate change are major risks to our business, because of the potential impact on the supply and cost of the ingredients we use in our products. So we’re taking action to help farmers in our supply chain adapt to the effects of climate change and use water more efficiently to improve crop yields, while also using less water. We focus on water-scarce countries and our most water-intensive crops, such as tomatoes. Also, ‘as part of its commitment to invest €1 million a year in sustainable agriculture partnerships, Knorr has been working with tomato supplier Agraz to introduce more efficient irrigation in tomato fields. Cutting-edge sensors and soil probes now let farmers know exactly how much water is necessary for the healthiest, tastiest tomatoes to flourish. And not a drop goes to waste. It’s a move that has reduced the amount of water required by 30%, increased yields by 20% and improved the quality and flavour of the tomatoes. The Agraz partnership is just one example of how Unilever brands are working with the agricultural sector to raise awareness of the importance of conserving water, and investing in technology to facilitate lasting positive change’. However, it is not clear how it works with suppliers to improve their practices in relation to access to water and sanitation in the context of taking of affecting access to safe water for communities and other users in the vicinity. [Working with suppliers &amp; farmers, 16/08/2019: <a href="http://unilever.com">unilever.com</a> &amp; How we’re tackling water issues, 22/03/2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.a	Women's rights (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to stop harassment and violence against women: The Company indicates that ‘we prohibit sexual harassment in the workplace and any concerns reported and substantiated will result in disciplinary and corrective action’. It states that focus in two areas: ‘raising awareness by promoting gender sensitivity, and ensuring that we have an effective and trusted grievance mechanism’. In this sense, it indicates that rolled out new internal guidelines and clarified to whom employees can turn to for support through new learning materials. The Company also reports an example of training carried out in tea plantations. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Working conditions take account of gender: The company indicates that, in 2018, it ‘held consultation and feedback meetings with women tea workers and growers in Assam, India’. This specific activity could help the company to take into account how gender affects working condition. However, no evidence of a broad approach to the issue, including reproductive health, was found. Also, ‘In 2017 we introduced our Global Maternal Well-being Standard, which had been rolled out to every country in which we operate by the end of 2018. The Standard gives returning mothers access to facilities that allow them to nurse their baby and to have all the flexibility they need to return to the workplace. Among other measures, it entitles all employees to 16 weeks of paid maternity leave as a minimum. Although our previous entitlements already met local regulatory requirements, our Standard is a major advance. In 54% of the countries in which we operate, it exceeded the local regulatory requirement when we introduced it’. However, it is not clear how it takes into account other differential impacts on women and men of working conditions, including to reproductive health. [Update of our Progress to address our salient human rights issues, 03/04/19: <a href="http://unilever.com">unilever.com</a> &amp; Advancing diversity and inclusion: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Equality of opportunity at all levels of employment: The Company states that 'reducing the average pay gap between men and women is a crucial part of fair compensation. We annually monitor our pay structures in each country to ensure we remain compliant with equal pay for equal work. However, even with equal pay compliance, there may still be an average pay gap between women and men in a country if there is unequal representation of gender in certain job types or in progression to senior roles. We are beginning to use average pay gap analysis in countries to identify areas of gender representation inequality, to then target appropriate interventions'. In addition, the Company discloses a specific report called 'opportunities for women' describing the work carried out within its business and supply chain. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; Opportunities for women report, 03/2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meet all requirements under score 1</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: The RSP contains a recommendation to ensure workers have the same rights and entitlements irrespective of the contract status: 'special attention is paid to short-term, casual and agency workers and to vulnerable groups such as women, migrants, the disabled, legal young workers and interns/trainees to ensure such workers have exactly the same entitlements as full-time local workers'. It also has a commitment to non-discrimination in employment, including hiring, compensation [...] based on [...], gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination'. Women are considered part of vulnerable group. However, this statement does not specifically refer to health and safety concerns particularly relevant to women, and no evidence found of statements covering these topics. No new evidence found. [Responsible sourcing policy, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: How working with suppliers on women's rights: The 'opportunities for women report' describes work carried out in the supply chain in relation to women's rights, including, among others, 'enabling women farmers, particularly smallholders, to improve their skills and capabilities', or 'enhancing women's land rights to enable greater access to finance and ability to invest to improve productivity and incomes'. It also reports on how promotes respect for rights and safety in the supply chain providing examples of gherkin farmers in India or safety of women in the tea sector in Kenya and other places. [Opportunities for women report, 03/2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress: The Company provides two figures covering non-conformances by type and by country for the period 2015-2016. One topic is 'discrimination &amp; harassment'. Although harassment in the context of the report focus mainly on women, discrimination, although includes women refers to different vulnerable groups, therefore trend disclosed, despite including women's issues, also cover other vulnerable groups, and it is not clear which has been the specific performance in relation to women. No new evidence found. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a> &amp; 2018 Supplier Audit Information, 2018: <a href="http://unilever.com">unilever.com</a>]</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: Unilever accused of failing to protect workers from deadly 2007 attack at its Kenya tea plantation</li> <li>• Area: Health and Safety</li> <li>• Story: In 2018 a group of NGOs brought a case against Unilever in the UK. The claim arises out of allegations that Unilever failed to protect their tea workers from the ethnic violence in 2007 at Unilever Tea Kenya Ltd., one of its subsidiaries. In 2007, following the general election, ethnic violence erupted throughout Kenya. Large groups of attackers invaded the Unilever Tea plantation and attacked hundreds of workers and their families with clubs and machetes. The claim was brought by 218 claimants, including the families of 11 victims who were brutally killed, and a large number of people who suffered serious violent attacks, including gang rape. The claim alleges that Unilever had placed their workers in a position of serious risk because many of the workers were from tribes which were not local to the area, so were specific targets of violence from the majority tribe (which surrounded the plantation) at times of social unrest. In July 2018 a Court of Appeal in the UK upheld a previous decision to strike out the claims against the parent company Unilever PLC on the basis that the evidence relied upon by the Claimants failed to disclose a level of control by Unilever PLC over Unilever Tea Kenya Limited's operations that was sufficient to warrant the imposition of a duty of care. The relationship did not have sufficient proximity to hold the parent company accountable. On 18 January 2019, REDRESS along with four other NGOs submitted a letter to the Supreme Court in support of that application for permission to appeal.</li> <li>• Sources: [Redress - 20/04/2018: <a href="http://redress.org">redress.org</a>][Freshfields Bruckhaus Deringer - 09/07/2018: <a href="http://riskandcompliance.freshfields.com">riskandcompliance.freshfields.com</a>][Redress - 30/01/2019: <a href="http://redress.org">redress.org</a>][BHRRRC - 23/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company has a publicly available response to the event and subsequent legal decisions. [Unilever Kenya Tea response (BHRRRC), 23/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The response from the company goes into detail, outlining the steps taken following the violent events in 2007, and responding to the legal decisions that resulted. [Unilever Kenya Tea response (BHRRRC), 23/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company in its 'Code of Business Principles and Code Policies' says "Unilever is committed to providing healthy and safe working conditions. Unilever complies with all applicable legislation and regulations and aims to continuously improve health and safety performance". The company also commits to comply with International Bill of Rights and the ILO Declaration on Fundamental Rights at Work. [Code of business principles and code policies: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: A note in the company's 'Code of Business Principles and Code Policies' says that "In this Code the expressions 'Unilever' and 'Unilever companies' are used for convenience and mean the Unilever Group of companies comprising Unilever N.V., Unilever PLC and their respective subsidiary companies". Unilever Kenya Tea Limited is a subsidiary of Unilever and thus the Health and Safety policies apply in this business relationship. [Code of business principles and code policies: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company in its 'Human Rights Progress Report 2017' discloses both quantitative and qualitative data for health and safety. Additionally in the report the company states "We align with the Voluntary Principles on Security and Human Rights. Where we employ security guards directly, we have an active training programme to ensure the highest standards of security and guarding. This includes being able to identify issues together with local law enforcement and respond to them in an appropriate way that focuses on rights-holders. These standards and expectations are also replicated in our third party guarding contracts". A specific reference is also made to the Kericho Tea Plantation. [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: The company in a statement referring to Kenya Tea workers said "Following the unfortunate events of 2007, Unilever provided significant support to those employees impacted. On return to Unilever, employees whose possessions had been looted were provided with replacement items, including furniture, bedding and clothing, TVs, mobile phones and cows (or cash to purchase these items). Anyone unable to undertake their previous role was retrained to take up a different job and medical support and counselling were freely available. Overall, 93% of those affected returned to work at Unilever"...."Every Unilever Tea Kenya employee was also provided with compensation in kind to offset the impact of loss of earnings during the instability". This is sufficient evidence of engagement with the affected stakeholders. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Encourages linked business to engage affected stakeholders: The statement is attributed to the Unilever Group, as Unilever Tea Kenya Limited is a subsidiary of the organization this response can be considered sufficient evidence of the linked business engaging the affected stakeholders. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: The company says "Following the unfortunate events of 2007, Unilever provided significant support to those employees impacted. On return to Unilever, employees whose possessions had been looted were provided with replacement items, including furniture, bedding and clothing, TVs, mobile phones and cows (or cash to purchase these items). Anyone unable to undertake their previous role was retrained to take up a different job and medical support and counselling were freely available". However due to the filing of the lawsuit in 2016 by 218 claimants, and the letter requesting permission to appeal the decision to the UK Supreme Court which is currently awaiting outcome, remedy is not considered to be provided. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Redress article, 30/01/2019: <a href="https://redress.org">redress.org</a>]</li> <li>• Not met: Has reviewed management systems to prevent recurrence: The company says "Unilever stands by the commitments made in our Human Rights Policy Statement, including to the UN Guiding Principles, and we strongly reject any allegation that we did not respect these in the case of the tea workers affected by the nationwide breakdown of law and order that occurred in Kenya in 2007. An international commission of enquiry set up by the Kenyan Government concluded the scale and ferocity of the attacks was not foreseeable". However there is no publicly available evidence that the company has reviewed its management system following the 2007 event. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: In reference to the support provided to workers involved in the 2007 violence, the company says that "Anyone unable to undertake their previous role was retrained to take up a different job and medical support and counselling were freely available. Overall, 93% of those affected returned to work at Unilever". However the fact that 93% of workers returned to work is not evidence that the victims were satisfied with the remedy provided. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Redress article, 30/01/2019: <a href="https://redress.org">redress.org</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The company has engaged with the affected stakeholders and victims of the violence by offering them compensation, medical support and counselling. However there is no publicly available evidence that the company has improved its systems to prevent a similar incident occurring in the future. This is not sufficient to receive a score. [Unilever Kenya Tea response (BHRRC), 23/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Redress article, 30/01/2019: <a href="https://redress.org">redress.org</a>]</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Unilever faces social allegations over its palm oil sourcing in Indonesia</li> <li>• Area: Child labour / forced labour</li> <li>• Story: On November 30th 2016, Amnesty International published a report in which it accused the palm-oil supplier Wilmar and Wilmar's major clients including Unilever, Kellogg's, Reckitt Benckiser, Colgate-Palmolive and Nestlé of human rights violations in its supply chain processes in Indonesia. These companies are alleged to have been complicit in the use of child labour and forced labour, with workers subjected to poor working conditions. They are also accused of contributing to deforestation and the extinction of rare species in Indonesia, endangering workers' health through exposure to dangerous chemical herbicides</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and failing to provide safety equipment. In addition, labourers allegedly work for around 10 to 11 hours a day without adequate pay, while children allegedly work from the age of eight. Amnesty vowed to conduct a campaign to ask if the companies' products are issued from Wilmar activities in Indonesia.</p> <p>In March 2017, Amnesty repeated its accusations claiming the situation had not been resolved and alleging that Wilmar was continuing to intimidate workers to prevent them from speaking out.</p> <ul style="list-style-type: none"> <li>• Sources: [Forbes: <a href="http://forbes.com">forbes.com</a>][Amnesty International: <a href="http://amnesty.org">amnesty.org</a>][Amnesty International report: <a href="http://amnesty.org.uk">amnesty.org.uk</a>][Amnesty International: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: Unilever responded to Amnesty's report in a letter to the organisation which was published by AI. In that letter the company details its policy but does not specifically responds to the allegations. Wilmar responded to the Amnesty International report and it is publicly visible as annex to the report. It has acknowledged the issue stating "we recognize that these issues, including the ones raised in your letters, are systemic challenges shared by the industry". Regarding child labour, it refers to the issue in general in Indonesia. In its second letter to Amnesty, Wilmar reports on having started an investigation into the allegations in question. It has not responded on the issue of overtime in its response to Amnesty International. [Response to Amnesty International report, 30/11/2016: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised</li> <li>• Met: Policies apply to the type of business relationships involved</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company's Responsible Sourcing Policy do indicate that employees should be of an appropriate age and that work has to be conducted on a voluntary basis.</li> </ul>
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: In its 'Palm Oil Grievance Tracker' document, Unilever provides a detailed timeline of the steps that have been undertaken since the allegations made by Amnesty in its 2016 report 'The Great Palm Oil Scandal'. One of the documents is an update provided by Wilmar in February 2018, which stated that "Oxfam, Serbundo and Kapal Perempuan conducted on-site research in PT DLI from 2 to 4 January 2018, focusing on the working conditions for female workers and their reproductive rights in oil palm plantations. The research studied work sites and workers' housing compounds. Several key stakeholders were interviewed, including the company management, medical officers and most importantly, our female workers". This is sufficient evidence of engagement with affected stakeholders. [Palm Oil Grievance Tracker, 17/06/2019: <a href="http://unilever.com">unilever.com</a> &amp; Letter to Amnesty International, 26/03/2018: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Encourages linked business to engage affected stakeholders: Unilever provided a letter in response to Amnesty International in March 2018, which states that "We have welcomed and supported the efforts by producing companies - including Wilmar - to work together as an industry and partner with external expert organisations to better identify, address and remediate human and labour rights issues in the palm oil plantations and mills - including those highlighted in your report the Great Palm Oil Scandal...Our palm oil suppliers, including Wilmar, continue to be bound by the requirements of our Responsible Sourcing Policy covering refineries and are required by us to comply with our Sustainable Palm Oil Sourcing Policy. We require them (as for our other palm oil suppliers) to comply with our Sustainable Palm Oil Sourcing Policy in order to continue to do business with Unilever." [Letter to Amnesty International, 26/03/2018: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: While Unilever's March 2018 letter to Amnesty International that "We continued to have both face to face debriefings and calls with Wilmar for their progress to address and remediate the specific issues raised in your previous report and their overarching action plan to address matters at the Wilmar group level. This process started with the recognition of these issues and Wilmar's implementation of relevant policies at the group level." However this is not sufficient evidence that remedy has been</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>provided to the affected workers mentioned in the original Amnesty report. [Letter to Amnesty International, 26/03/2018: <a href="http://unilever.com">unilever.com</a> &amp; Palm Oil Grievance Tracker, 17/06/2019: <a href="http://unilever.com">unilever.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Has reviewed management systems to prevent recurrence: In its response to Amnesty International, Wilmar has indicated that 'in addition to the supplier compliance work and ART programme with our collaborative partner The Forest Trust (TFT), as well as the supply chain surveillance work by an international NGO partner on more than 40 palm oil companies at plantation, mill or group level, our grievance procedure is the other platform used to identify, address and monitor potential supply chain non-compliance'. Unilever itself has explained its actions in a letter to Amnesty. In that letter, Unilever explains how they are increasing traceability of palm oil and 'started developing a roadmap for achieving supplier compliance to our Sustainable Palm Oil Sourcing Policy' [Letter to Amnesty International, 26/03/2018: <a href="http://unilever.com">unilever.com</a> &amp; Response to Amnesty International report, 30/11/2016: <a href="http://unilever.com">unilever.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: As stated above Unilever and Wilmar have not provided sufficient evidence that remedy has been provided to the affected workers originally referenced in the Amnesty International report. [Palm Oil Grievance Tracker, 17/06/2019: <a href="http://unilever.com">unilever.com</a>]</li> <li>• Met: Has improved systems and engaged affected stakeholders: In November 2018 Verite released an update on its program with Wilmar, this update outlined a number of changes that had been undertaken by Wilmar in relation to its Child Protection Policy, Pay Practices, Casual Labour and Gender discrimination. This is in addition to a number of consultations with stakeholders in the company's operations which had been carried out previously. [Palm Oil Grievance Tracker, 17/06/2019: <a href="http://unilever.com">unilever.com</a> &amp; Verite-Wilmar update, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.84 out of 4	Out of a total of 51 indicators assessed under sections A-D of the benchmark, Unilever made data public that met one or more elements of the methodology in 49 cases, leading to a disclosure score of 3.84 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on UNGPRF: The Human rights report includes the UN Guiding Principles reporting framework index [Human rights progress report, 2017: <a href="http://unilever.com">unilever.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	2.8 out of 4	<p>Unilever met 7 of the 10 thresholds listed below and therefore gets 2.8 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Met: Score 1 for D.1.1.a: Living wage (in own agricultural operations)</li> <li>• Met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)</li> </ul>

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.