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# Unilever's approach to Human Rights Due Diligence

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## Introduction

Businesses continue to grapple with human rights challenges in a world that is rapidly changing. Technology such as AI, climate change and geopolitical tensions add to the complexity of these issues and increase the potential of negative impacts to people, particularly those in a position of vulnerability. This paper outlines our approach to embedding the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) throughout our own operations and value chain as well as our collaborative partnerships that seek to drive industry and systemic change.

This is a living document that will be updated regularly as our work continues.

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## 1. Commitment and Governance

### Governance

We are committed to our responsibility to respect human rights. It underpins everything we do and is embedded into our organisational structure. Governance of our human rights strategy is led from the top, overseen by our CEO and supported by our Unilever Leadership Executive (ULE). The ULE is consulted on human rights issues, in particular when the severity of an actual or potential impact is high, where a business-critical decision needs to be taken, or where significant investment may be needed to address an impact. Additional Board-level oversight is provided by the Corporate Responsibility Committee (CRC), including on safety, security and wellbeing. A cross-functional, internal working group is responsible for overseeing potential and actual impacts associated with our business activities in conflict-affected and high-risk areas (CAHRAs). Outputs of this working group are reported to senior internal stakeholders including members of the ULE and Board as appropriate. Details about our governance structure can be found on page 3 of our [2024 Modern Slavery Statement](#).

### Policy Framework and Contractual Requirements

Unilever has a clear policy framework that integrates respect for human rights into how we operate. Our policies help us set consistent expectations and standards for ourselves and business partners that we work with, drive action consistent with our commitment, and assign clear responsibility and accountability.

We engage both internally and externally to raise awareness of and compliance with our policies. We require contractual assurances from all business partners that they meet the Mandatory Requirements of the RPP (through self-declarations on registration and annual re-registration to our supplier management system) and that they will appropriately address any negative impacts identified. When the RPP was updated in 2023, we formalised the expectation that business partners cascade equivalent requirements within their supply chain and carry out their own human rights due diligence. To support business partners implement the RPP, we published detailed implementation guidance and made training and other resources available. Further information about our engagement with business partners and these resources can be found on [Unilever.com](#).

When we review policies to update and strengthen them, we also gather input from internal and external stakeholders, particularly rightsholders and proxies acting on their behalf, such as civil society and trade unions.

We take steps to monitor how effective our policies are in respecting human rights. For our own operations this is managed through several programmes and committees, including the Global Code and Policy Committee. For business partners this is managed through the Responsible Sourcing Programme and the Procurement Business Integrity Committee. Further information about these can be found on [Unilever.com](#).

## 2. Identifying, assessing and prioritising potential and actual impacts

### Identifying Impacts

We strive to effectively identify and understand potential and actual impacts to people, and the root causes of these impacts. We also work to prevent potential impacts from becoming an issue, while monitoring for new and emerging impacts.

The UNGPs define salient human rights as those that 'are at risk of the most severe negative impacts through a company's activities or business relationships'. Our eight salient human rights are:



Each of these issues is viewed through the lenses of gender and climate impact to understand the influence these have on exacerbating the human rights issue.

We regularly review the severity (the scale, scope and remediability) and likelihood of impacts throughout our value chain to ensure we prioritise the most serious and significant human rights impacts. We carried out a review of our salient human rights issues in 2023 and made changes to the way we frame some of the issues, as well as introducing the two lenses.

We have developed frameworks for each of our salient human rights issues, which have the following key elements:

- Description and common understanding of the issue, who is impacted and how, and the root causes of the issue
- Theory of change for addressing the issue as well as the vision of the outcome we want to deliver
- Interventions or strategic priorities that we focus on to deliver this change

### Own operations

We expect everyone at Unilever to be an ambassador for our high ethical standards. Our Business Integrity team oversees robust procedures and controls to help us prevent, detect and respond to a range of issues, including human rights impacts. We carry out internal analysis of breaches of our Code of Business Principles to gather insights and identify root causes, which we then act on to improve our performance. Further information about our Business Integrity programme can be found on [Unilever.com](https://www.unilever.com).

### Value chain

We take a multidimensional approach to identifying potential and actual human rights impacts in our global value chain, using inputs from a range of sources including:

- [Verisk Maplecroft](#) external risk indicators, based on country-level analysis
- Insights from our Business Integrity committees, internal subject-matter experts and our teams in local markets
- Business partner self-assessments carried out through our Responsible Sourcing Program
- Historic COBP breaches
- Grievances raised and direct engagement with workers
- The views and work of industry experts, civil society, trade unions and our peers
- Carrying out heightened human rights due diligence where appropriate
- Worker-facing technologies including mobile tools such as [diginex](#) to gather insights from workers about their experiences

Where there is risk of Unilever being linked to potential or actual impacts to both people and conflict situations, we carry out appropriate human rights due diligence. We have processes in place for assessing and identifying situations that require human rights due diligence in conflict-affected areas.

In 2024 we developed internal guidelines for responsible disengagement as a reference document that teams across the business can use when making commercial decisions. The guidelines include tools that ensure consideration is given to the potential impacts to people in our value chains when considering exiting a country, region or sector.

Rightsholder engagement is a key component in our human rights due diligence approach, including in the identification of potential and actual human rights impacts. We gather insights about the experiences and issues that people in our value chain face including through partnerships that use technology solutions such as mobile apps and survey platforms. These views help to inform the approach we follow in taking action to address the impacts. Examples of our work can be found in our [case study on Women in our Supply chain](#) and pages 8 and 10 of our [2024 Modern Slavery Statement](#)

In collaboration with Oxfam we developed a rightsholder engagement playbook that sets out a consistent approach and best practice methods for engaging with people in our value chain. Teams across Unilever can adapt the guidance to their specific needs and better understand the function of engagement in a variety of scenarios. We are piloting the playbook within our plastic packaging value chain in India and Indonesia and apply lessons we learn from the pilot to improve our approach.

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### 3. Act to prevent and mitigate

In line with the OECD guidelines, we address any potential impacts through prevention or mitigation measures (actual impacts are addressed through mitigation and remediation (see section 4 for further information in remediation)). Unilever responds to potential and actual adverse human rights impacts with consideration given to a variety of factors, including the location of the issue, our leverage and our relationship to the issue (whether we have caused, contributed to, or are linked to it). Our actions to address potential and actual human rights impacts include:

- Embedding effective management systems across our own operations
- Delivering training and capability building
- Participating in advocacy and multi-stakeholder collaborations, in partnership with peer companies and expert partners, to address root causes of impacts and drive systemic change

#### Own employees

All of our employees are trained on our [Code of Business Principles & Code Policies](#), which includes human rights requirements. We have robust safety protocols and we regularly provide safety

guidance to employees, which we revise and strengthen. Further information about this can be found on [Unilever.com](https://www.unilever.com).

Learning resources are accessible to employees on demand and include short interactive e-learning modules to introduce the fundamentals, expert-led webinars on individual topics, and function-specific training to build the appropriate depth of working knowledge and skills required for their roles. Specific salient issue training has been created for employees where there is an increased risk, such as forced labour prevention training for procurement teams with business partners operating in Thailand and Malaysia (see page 8 of our [2024 Modern Slavery Statement](#)).

We have formal and informal consultations with unions, including the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) and IndustriALL. These consultations help us have constructive engagement on workplace practices, enabling us to be proactive and pre-emptive in solving industrial and employment relations issues.

## Value chain

Collaboration is critical to our human rights due diligence approach. Unilever collaborates with a wide range of third parties to prevent and mitigate human rights impacts in our value chain. In 2024 we engaged an implementation partner to support business partners to strengthen their human rights due diligence processes and improve workers' ability to access their rights (see 2025 Modern Slavery Statement for details) through a training and improvement programme. We also make resources publicly available, including the [Living Wage Resources Page](#), to support suppliers with insights, information and guidance as they implement living wages in their organisations., to support suppliers with insights, information and guidance as they implement living wages in their organisations.

We also shared our [Principles in support of Human Rights Defenders](#) (HRDs) with suppliers as a resource when carrying out their own due diligence, particularly relating to land rights, and to help them meet the requirements of the RPP which specifically calls out zero tolerance of any abuse, threats, intimidation or reprisals against HRDs.

## Industry partnerships

In addition to training and resources, we actively engage in industry platforms and groups to drive industry improvements at scale. We are a founding member in the [Fair Circularity Initiative](#), a group of fast-moving consumer goods companies collaboratively taking steps to prevent and mitigate impacts to waste pickers in the informal waste sector (see [case study](#)). We also established a [partnership](#) with financial support from the Bonsucro Impact Fund aiming to strengthen human rights due diligence systems in the sugar industries in India and Thailand. We are also members of AIM-Progress and the Consumer Goods Forum and participate in working groups convened through these platforms to drive improvements and advocate for industry change.

Further information about our work to prevent and mitigate potential impacts can be found on [Unilever.com](https://www.unilever.com), in our human rights reports ([2021](#) and [2022](#)) and [Modern Slavery Statements](#).

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## 4. Effective operational grievance mechanisms and access to remedy

Once a potential impact (or risk) is identified, we work to address it, sometimes with collaborative input from a variety of stakeholders. If an impact is found to have occurred, then we work to

remediate it, verify remediation and put appropriate processes in place to seek to prevent the issue from happening again.

## Own operations

For employees, our Business Integrity programme manages cases that are reported via our [Speak Up platform](#). Once a grievance is received, it is formally acknowledged. Where appropriate and possible, transparency is given with regards to the investigation progression and anticipated completion.

Each Business Integrity Committee is responsible for ensuring the timely investigation of all alleged or suspected Code breaches by an individual employee – with a view to reaching a final determination within 60 days. More information about this programme can be found on [Unilever.com](#).

We analyse the results of investigations to identify trends and opportunities for improvement. On a quarterly basis we collect key case information across each geography to develop best practice examples and highlight lessons learnt. This information is shared with functional and country leaders, Code Policy owners and our wider Business Integrity network.

We strive to ensure that grievance mechanisms available in our own operations meet the effectiveness criteria outlined in the UNGPs. This is also a requirement for business partners in our RPP.

## Value chain

Business partners and their workers, communities and other stakeholders may report actual or suspected breaches of the RPP (including any failure by a Unilever worker or anyone acting on behalf of Unilever) to [Unilever by phone or online](#). Reports can be submitted confidentially and anonymously (where permitted by law). Our People and Nature Grievance Mechanism provides a framework for handling, investigating and resolving social and environmental issues within our supply chain and also provides a framework for handling, investigating and resolving social and environmental issues within our supply chain.

We expect a Corrective Action Plan (CAP) to be created by business partners to address issues identified during audits. Unilever defines the most severe non-conformances as 'Key Incidents' (KIs), which are those that represent a significant contravention of human rights. KIs are escalated by the auditors within 24 hours to Unilever and we expect an action plan to be provided by the business partner addressing KIs within seven days.

For all non-conformances identified, a follow up audit, carried out by an independent third-party auditor, is required within 90 days to confirm that the actions taken have been sufficient to remediate the identified issues. In some cases, the nature of the KI means that it is not possible to close within the 90-day period, for example where capital investment or significant changes in working practices are required. Where this is the case, the supplier is expected to develop an interim plan to reduce the risk until a permanent solution is put in place.

We support business partners to address these issues and have developed [Responsible Partner Policy Implementation Guidance](#) which includes resources and checklists for preventing impacts, remedying impacts and putting management systems and processes in place that prevent reoccurrence.

We seek to engage with affected rightsholders to improve our understanding of the impact to them and the remediation that most appropriately meet the needs of the individual/community that is affected. We report case studies of remediating impact in our Modern Slavery Statements and on [Unilever.com](#).

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## 5. Tracking implementation, results and impact

### Reporting

We previously published annual reports that detailed our work over the calendar year. However, this reporting cadence restricts us from providing more frequent updates to investors, customers and other stakeholders on progress as it occurs. Going forward, to communicate in a more accessible way to a wider audience, we will be providing more regular updates on our corporate website in the form of case studies, as well as revising this 'live' document periodically. We will continue to produce statements and reports required to meet legislative requirement (including a UK Modern Slavery Statement, which can be found in our [online repository](#)) to help us evaluate our progress, share lessons and identify trends.

### Measuring our impact

Measuring the impact of our human rights work is complex as changes are often incremental and gradual, making it difficult to capture and quantify progress over time. Best practice is evolving and we continue to adapt our approach. We have developed an impact measurement framework which aims to improve the consistency of how we measure the impact of our human rights strategy. This framework includes qualitative and quantitative indicators for each step of the human rights due diligence process along with data points that verify progress has been made. We have aligned this with the framework and indicators developed by members of the AIM-Progress impact measurement working group so that there is greater industry alignment on impact reporting. This continues to be a work in progress as we refine and improve both indicators and data available.

We have also developed action plans for teams across Unilever responsible for delivery of key elements of our human rights strategy. This ensures all stakeholders are accountable for delivery and enables us to track performance over time.

Human rights due diligence is an ongoing process and we continue to adapt our approach as we learn. We will continue to build and use our scale and collaborate with other companies, civil society, trade associations, governments and rightsholders so that we address the root causes of human rights issues and are able to influence systemic and lasting change.