
Unilever's approach to Human Rights Due Diligence

Purpose of this document

Respect for human rights remains the non-negotiable foundation of Unilever's business. Our human rights strategy is grounded in the [UN Guiding Principles on Business & Human Rights](#) (UNGPs) and this document summarises Unilever's approach to Human Rights Due Diligence (HRDD), an operational principle of the (UNGPs). This is a living document that will be updated regularly with new material and case studies that bring our work to life.

1. Commitment and Governance

General description of the business

Unilever Norge AS imports, sells, and markets fast-moving consumer brands and products. In 2024 the company operated across five categories: Beauty & Wellbeing, Personal Care, Home Care, Nutrition, and Ice Cream. The company's customers are mainly large grocery chains, wide assortment chains, online shopping, and large household wholesalers.

The company's head office is located on Martin Linges vei 25, 1364 Fornebu in Bærum municipality. In 2024 Unilever Norge AS had 21 employees, but no production in Norway.

Governance

Our approach is to embed respect for human rights in all parts of our business by implementing the UNGPs. A description of our business and its operations can be found on page 2 of our [Unilever Modern Slavery Statement March 2024](#) and details about governance of our human rights strategy can be found on page 3 of our [2024 Modern Slavery Statement](#).

Policy Framework and Contractual Requirements

Unilever has a comprehensive policy framework that integrates respect for human rights into how we operate and drives the behaviour we expect from our employees and those in our value chain, which is summarised in our [Human Rights Policy Statement](#).

Our [Code of Business Principles](#) and 24 related Code Policies set out how we seek to ensure compliance with laws and regulations, protect our brands and reputation, and prevent harm to people and the environment. All Unilever employees are expected to know our Code and Code Policies and how to apply them in their work.

Our requirements for business partners are set out in our [Responsible Partner Policy](#) (RPP), which applies to all tier 1 suppliers, as well as companies that have a

contract and/or carry out work for Unilever, or distribute our products to retailers or customers. We require contractual assurances from all business partners that they meet the integrity and ethics, human rights and environment-related requirements detailed in the RPP and that they will appropriately address any negative impacts identified. We also expect business partners to cascade equivalent requirements within their supply chain and carry out their own human rights due diligence. Further information about this can be found on [Unilever.com](https://unilever.com).

Engaging with third parties beyond Tier 1 on our policy expectations

As well as the RPP, we have clear principles for direct suppliers of specific materials (cocoa, palm oil, pulp & paper, soy and tea), their corporate group operations and third-party supply chains, as well as third-party manufacturers, set out in our [People and Nature Policy](#). Principle 2 of the People and Nature Policy requires in-scope third parties to:

- Conduct HRDD within their own operations and supply chains.
- Develop and embed effective Management Systems to meet the requirements of the RPP and the People and Nature Policy.
- Demonstrate compliance verified through an independent certification scheme.

2. Identifying, assessing and prioritising risks

Identifying Risk

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

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'. We have identified eight salient human rights issues:

- Bullying and harassment
- Discrimination
- Fair wages and income
- Forced labour
- Freedom of association and collective bargaining
- Health
- Land rights (including indigenous rights)
- Working hours

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

We review our salient human rights issues to ensure our approach remains focused on the most appropriate areas. More information can be found on [Unilever.com](https://unilever.com).

Own operations

Unilever's Business Integrity programme brings to life our values for all employees. We have robust procedures and controls in place to help us prevent, detect and respond to issues, including human rights risks and impacts. Further information about this programme can be found on [Unilever.com](https://www.unilever.com).

Value chain

We verify RPP alignment through self-declarations upon registration and annual re-registration to our systems, routine due diligence and risk-based audits. This enables us to identify approved partners for the products and services we want to buy as well as enabling us to conduct due diligence and assess risks based on the goods or services being sourced and the geographies our partners operate in.

The information from the self-assessment questionnaire also helps us to determine which business partners require external auditing and specific engagement. For sites that are assessed as high risk, either a site audit or an [EcoVadis](#) desk-top assessment is used to verify compliance with the RPP. Further information about this process can be found on [Unilever.com](https://www.unilever.com).

We use a Social Risk Assessment tool to take data-based decisions on priority areas in a systematic way. Further information on this can be found on page 17 of our [2021 Human Rights Report](#). Supplier segmentation is also used to prioritise focus and resources dependent on risk.

We have adopted elements of the [Voluntary Principles on Security and Human Rights](#) and monitor global situations using a range of sources. Where heightened human rights due diligence is required, we follow established internal processes for making decisions on the most appropriate course of action in relation to each unique situation. We also have internal guidelines for responsible disengagement.

3. Act to prevent and mitigate

Unilever responds to identified adverse human rights risks and/or impacts with consideration given to a variety of factors, including the location of the issue (whether it be in our own operations or in our value chain) and our leverage. Our actions to address potential and actual human rights impacts include:

- Embedding effective management systems across our own operations
- Working with our business partners to drive responsible business
- Delivering training and capability building
- Participating in advocacy and multi-stakeholder collaborations to address root causes and drive systemic change

These activities are often carried out in partnership with peer companies and expert partners.

Own employees

All employees are trained on our [Code of Business Principles & Code Policies](#), which includes human rights requirements. We have robust safety protocols, which we continually strengthen, and we regularly provide safety guidance with employees. Further information about this can be found in our [2021 Human Rights Progress Report](#).

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](#)).

Value chain

Unilever collaborates with a wide range of third parties to deliver training and capability building programmes aimed at raising awareness of human rights issues and strengthening action on preventing and mitigating potential and actual risk. Information about these programmes can be found on [Unilever.com](#), in our human rights reports ([2021](#) and [2022](#)) and [Modern Slavery Statements](#). Examples include:

- A [collaboration](#) (page 6) with technology platform provider, [diginex](#), a tool which helps suppliers understand and address gaps in their responsible recruitment policies
- Supporting smallholder farmer families in Madagascar through the [Vanilla for Change](#) programme which includes financial resilience training for smallholder farmers, as well as literacy and numeracy skills development for their children, helping to provide better opportunities for the next generation.
- Our participation as a founding member in the [Fair Circularity Initiative](#), a group of fast-moving consumer goods companies collaboratively taking steps to address social issues faced by waste pickers in the informal waste sector.

Remediation and access to remedy

Once a risk is identified, we work to address it, sometimes with collaborative input from a variety of stakeholders. If the risk materialises and 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](https://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.

Value 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.

Examples of remediation of identified impacts include:

- Reimbursing workers for recruitment fees paid, including verification of the process from an independent consultant (see page 12 of our [2024 Modern Slavery Statement](#))
- Training workers and managers on their rights in addition to reimbursement of deductions made by sub-contractors (see page 14 of our [2023 Modern Slavery Statement](#))
- Returning migrant workers' passports that had been retained by a recruitment agency, which was identified during an audit within our value chain (see page 19 of our [2024 Modern Slavery Statement](#) for detail of the data)

- [Supporting initiatives in the cocoa production sector](#) to implement Child Labour Monitoring and Remediation Systems (CLMRS) across 41,936 households in Cote d'Ivoire and Ghana

Grievance mechanisms

Business partners are expected to meet the following mandatory requirements of the RPP in relation to grievance mechanisms:

- All workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and equitable resolution of issues which may arise as part of their working relationship.
- The grievance mechanisms are in line with the UNGPs and are well communicated and accessible in order to enable workers to report any issue.
- The grievance mechanisms guarantee the confidentiality of any complainant unless permission is given by the complainant to disclose to a given person.
- Those reporting a grievance or participating in any investigation of a grievance must not be retaliated against.
- Grievances are fully addressed in an effective, timely and respectful manner, and escalated to and overseen by the appropriate level of management.

Business partners and their workers, communities and other stakeholders may also 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 [Palm oil grievance mechanism](#) provides a process for handling, investigating and resolving issues within our palm oil supply chain.

We aim to engage with affected rightsholders to improve our understanding of remedies that most appropriately meet the needs of the individual/community. We seek to ongoingly review awareness of our internal and externally-facing mechanisms and the level of trust in them as an effective and safe way to raise issues.

4. Tracking implementation, results and impact

We regularly report progress of our work to manage human rights risks and impacts. This includes human rights reports, which can be found in the downloads section on [Unilever.com](#) and our Modern Slavery Statements which can be found in our [online repository](#) providing progress updates on our work, including to

remediate impacts we have identified. We also publish [business partner audit data reports](#) which enable us to track progress of our monitoring activities.

We take steps to monitor how effective our policies are in respecting human rights both within Unilever and in our value chain. For our own operations, this is managed through a number of programmes and committees, including the Global Code and Policy Committee for our own operations, and the Procurement Business Integrity Committee for our supply chain. Further information about these can be found on [Unilever.com](https://unilever.com).

We are also developing an impact measurement framework to consistently report on the impact of our human rights due diligence work. We will provide an update on this in our 2025 Annual Report and Accounts.



David Scholander
Chairman of the Board



Steinar Kasbo
General Manager & Board Member



Jonna Marie Bohdén Ragnhildstveit
Board Member












Unilever HRDD April 2025

Final Audit Report

2025-04-25

Created:	2025-04-25
By:	Lill Burriel (Lill.Burriel@unilever.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAOIjPxWWaY_M9hWjKWLCQuhioux3ijag

"Unilever HRDD April 2025" History

-  Document created by Lill Burriel (Lill.Burriel@unilever.com)
2025-04-25 - 9:43:09 AM GMT- IP address: 147.161.189.107
-  Document emailed to David Scholander (David.Scholander@unilever.com) for signature
2025-04-25 - 9:49:25 AM GMT
-  Document emailed to Jonna Ragnhildstveit (Jonna.Ragnhildstveit@unilever.com) for signature
2025-04-25 - 9:49:25 AM GMT
-  Document emailed to Steinar Kasbo (Steinar.Kasbo@unilever.com) for signature
2025-04-25 - 9:49:26 AM GMT
-  Email viewed by Jonna Ragnhildstveit (Jonna.Ragnhildstveit@unilever.com)
2025-04-25 - 9:58:29 AM GMT- IP address: 104.28.31.64
-  Document e-signed by Jonna Ragnhildstveit (Jonna.Ragnhildstveit@unilever.com)
Signature Date: 2025-04-25 - 9:59:03 AM GMT - Time Source: server- IP address: 104.28.31.64
-  Email viewed by Steinar Kasbo (Steinar.Kasbo@unilever.com)
2025-04-25 - 10:28:59 AM GMT- IP address: 52.102.18.53
-  Document e-signed by Steinar Kasbo (Steinar.Kasbo@unilever.com)
Signature Date: 2025-04-25 - 10:30:35 AM GMT - Time Source: server- IP address: 147.161.147.107
-  Email viewed by David Scholander (David.Scholander@unilever.com)
2025-04-25 - 10:44:10 AM GMT- IP address: 147.161.189.115
-  Document e-signed by David Scholander (David.Scholander@unilever.com)
Signature Date: 2025-04-25 - 10:44:45 AM GMT - Time Source: server- IP address: 147.161.189.115
-  Agreement completed.
2025-04-25 - 10:44:45 AM GMT