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# Unilever's approach to Human Rights Due Diligence

September 2025

## Introduction

Businesses today are operating in a rapidly changing global context, punctuated by rising geopolitical tensions, declining democratic governance, and weakening rule of law. These dynamics are accelerating inequality, climate change and nature loss – all of which impact people and their rights.

Unilever's Sustainability Strategy is built around four priority pillars – climate, nature, plastics, and livelihoods – underpinned by our steadfast commitment to respecting human rights. This paper sets out our approach to human rights due diligence, in line with the [UN Guiding Principles on Business and Human Rights](#) (UNGPs), across our operations and value chain. It also highlights how we engage in collaborative partnerships and advocacy to drive industry-wide and systemic change.

This is a living document, which we will continue to update as our work evolves.

## Policy and Governance

### Governance

Respect for human rights underpins everything we do and is embedded into our organisational structure. Governance of our human rights due diligence and risk management is overseen by the Unilever Board of Directors and its Corporate Responsibility Committee (CRC). The CRC's remit includes safety, security and wellbeing – with input from the Head of Social Sustainability and Human Rights. It regularly reviews our human rights strategy and assesses plans to address gaps in light of evolving legislative requirements and industry best practice. In 2024, the CRC reviewed our risk management processes to address potential and actual human rights issues, as well as decision-making mechanisms in place to embed human rights commitments across the business, including where heightened due diligence is required.

The Unilever Leadership Executive (ULE) endorses the importance of human rights for the business and ensures they are integrated into top-level decision-making. The ULE is consulted on issues where the severity of an actual or potential impact is high, where business-critical decisions are taken, or where significant investment may be required. The Human Rights team provides expertise and insights into emerging issues for the ULE to consider.

The business is also guided by the Unilever Sustainability Advisory Council, an independent body of external sustainability specialists, including a business and human rights expert, who advise and challenge our strategy.

A cross-functional, internal working group monitors potential and actual human rights impacts in conflict-affected and high-risk areas (CAHRAs). The group's findings are reported to senior stakeholders, including members of the ULE and Board, as appropriate.

Responsibility for the delivery of our human rights strategy is shared across our Sustainability and Corporate Affairs team, Supply Chain and Procurement, Legal, HR, Finance and our Business Groups, coordinated through salient issue action plans.

Finally, Unilever's Reward Framework reinforces accountability. Our Performance Share Plan (PSP) links remuneration for management employees and the ULE to progress against our sustainability goals, including delivery of our living wage goal. Performance is measured against our Sustainability Progress Index (SPI). Further information can be found in our [2024 Annual Report and Accounts](#) (page 105).

### Policy Framework and Contractual Requirements

Unilever's human rights policy commitments embed respect for human rights into the way we operate and are communicated at Board level. Our publicly available policies on [Unilever.com](#) set clear expectations and standards for our people and for the business partners we work with. They drive action consistent with our commitments, while assigning responsibility and accountability. In addition, we maintain internal standards and guidance documents that set expectations on issues such as preventing excessive working hours, ensuring due diligence when engaging temporary staff, and following protocols during land transactions.

We engage both internally and externally to raise awareness of, and compliance with, our policies. All business partners are required to provide contractual assurances that they meet the Mandatory Requirements of the [Responsible Partner Policy](#) (RPP). This is confirmed through self-declarations at registration and annual re-registration via our supplier management system. Partners are also expected to address any identified negative impacts, cascade equivalent requirements throughout their supply chains, and carry out their own human rights due diligence. To support implementation, we provide partners with detailed guidance, training, and other resources. Further information is available on [Unilever.com](#).

In 2025, we are undertaking a comprehensive review of our sustainability and human rights policies, standards, guidance, and supporting documents, which have evolved over time. This process will streamline and simplify them under a consolidated framework. We will also engage rightsholder representatives to ensure that the updated documents reflect their needs and are communicated effectively.

We monitor the effectiveness of our policies through dedicated programmes and committees. For our own operations, this includes oversight by the Global Code and

Policy Committee. For business partners, effectiveness is assessed through the Responsible Sourcing Programme and the Procurement Business Integrity Committee. More details on these can be found on [Unilever.com](https://www.unilever.com).

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

We strive to identify and understand both potential and actual impacts on people, as well as the root causes behind them. Our aim is to prevent potential impacts from becoming issues, while continually monitoring for new and emerging risks.

The UN Guiding Principles on Business and Human Rights (UNGPs) define salient human rights as those “at risk of the most severe negative impacts through a company’s activities or business relationships.” Unilever has identified eight salient human rights, each assessed through the additional lenses of gender and climate impact, which help us understand how these factors can exacerbate risks.



We regularly review the severity (scale, scope, and remediability) and likelihood of human rights impacts across our operations and value chain to ensure we focus on the most serious issues. In 2023, we reviewed and updated our salient human rights framing, integrating gender and climate considerations. For each salient issue, we have developed a framework that includes:

- A description and common understanding of the issue, who is impacted, how, and the root causes
- A theory of change, setting out how we aim to address the issues and the outcomes we seek
- Interventions or strategic priorities to deliver this change

Our next review of salient human rights risks will take place in 2026, following the completion of our Ice Cream business demerger, and will include an evaluation of how our business model and practices influence these issues.

We take a multidimensional approach to identifying potential and actual human rights impacts in our global value chain, drawing on:

- [Verisk Maplecroft](#) external risk indicators, based on country-level analysis
- Insights from our Business Integrity committees, internal experts and local market teams
- Business partner self-assessments and on-site audits through our Responsible Sourcing Program
- Historic [Code of Business Principles](#) breaches
- Grievances raised and direct engagement with workers
- Insights from industry experts, civil society, trade unions and our peers
- Worker-facing technologies such as [Diginex](#) to gather insights from workers about their experiences

Our Business Integrity team oversees procedures and controls to prevent, detect, and respond to human rights impacts in our operations. We analyse breaches of our Code of Business Principles to identify root causes and improve performance. More information on our Business Integrity programme is available on [Unilever.com](https://www.unilever.com).

We also monitor for situations where there is a risk of Unilever being linked to negative human rights impacts, including in conflict-affected contexts. Where risks are identified, we apply proportionate due diligence.

In 2025, we launched a review of our purchasing practices to evaluate how our ways of working support business partners in upholding human rights. While some initiatives exist to strengthen two-way communication with suppliers, improve processes, and balance contractual arrangements, we recognise this as a priority area for improvement in our strategy.

Rightsholder engagement is central to our due diligence approach, including in identifying potential and actual human rights impacts. We gather insights through direct worker engagement, partnerships, and technology solutions such as mobile apps and survey platforms. These perspectives inform our actions to address impacts. Examples include our [case study](#) on a project financed by the Bonsucro Impact Fund and initiatives outlined on page 9 of our [2025 Modern Slavery Statement](#).

In collaboration with Oxfam, we developed a [Rightsholder Engagement Playbook](#), which provides a consistent approach and best practice methods for engaging with people in our value chain. We piloted the playbook in our plastic packaging value

chain in India and Indonesia, and used lessons learned to improve our approach. More details are available on [our corporate website](#).

## Prevent and mitigate

In line with OECD guidelines, we address potential human rights impacts through prevention and mitigation measures. Actual impacts are addressed through mitigation and remediation (see section below for more on remediation). Our response to potential and actual adverse human rights impacts takes into account several factors, including the location of the issue, our leverage, and our relationship to the impact (whether we have caused, contributed to, or are linked to it).

Our actions to prevent and mitigate impacts include:

- Embedding effective management systems across our own operations
- Delivering training and capability building
- Engaging 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 employees are trained on our [Code of Business Principles & Code Policies](#), which include human rights requirements. We maintain robust safety protocols and regularly update safety guidance. Further information is available on [Unilever.com](#).

Employees have access to learning resources on demand, including short interactive e-learning modules, expert-led webinars on specific topics, and function-specific training to build deeper expertise. In high-risk areas, tailored training has been introduced – for example, forced labour prevention training for procurement teams working with partners in Thailand and Malaysia (see page 8 of our [2024 Modern Slavery Statement](#)).

We also engage in regular consultations with trade unions, both formal and informal, including with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) and IndustriALL. These consultations support constructive dialogue on workplace practices, enabling proactive approaches to industrial and employment relations issues.

## Value chain

Collaboration is central to our approach. In 2024, we partnered with an implementation organisation to support business partners in strengthening their due diligence processes and improving workers' ability to exercise their rights (see [case study](#)). We also provide publicly available resources, such as our [Living Wage](#)

[Resources Page](#), which offers suppliers guidance and tools to help implement living wages in their organisations.

### Industry partnerships

We work through industry platforms to drive improvements at scale. For example, Unilever is a founding member of the [Fair Circularity Initiative](#), which brings FMCG companies together to prevent and mitigate impacts on waste pickers in the informal sector (see [case study](#)). We also established a [partnership](#) with the Bonsucro Impact Fund to strengthen human rights due diligence in the sugar sector in India and Thailand.

In addition, we are active members of AIM-Progress and its working groups, advocating for industry-wide improvements. Through the Consumer Goods Forum, we commit to the Priority Industry Principles, participate in the Human Rights Coalition, and serve on the steering committee developing an [Ethical Recruitment Marketplace](#), designed to establish ethical recruitment as standard practice across industries.

### Advocacy

Unilever proactively engages in advocacy where our risk exposure is high and our scale enables meaningful impact. In 2025, we refocused our human rights advocacy strategy on three areas:

- Living wage – raise awareness and drive commitment and action
- Forced labour – promote a level playing field for recruitment agencies in both source and destination countries of migrant workers, engaging government to strengthen forced labour prevention
- Women's safety – advocate for the adoption of ILO Convention 190 and promote implementation of industry standards and frameworks

### Access to remedy and remediation of impacts

Effective grievance mechanisms are essential for listening to, understanding, and acting on the concerns of our employees, workers in our value chain, and individuals and communities in the areas where we operate. When a potential impact or risk is reported or identified, we work to address it – often in collaboration with relevant stakeholders. Where an impact is substantiated, we remediate it, verify the effectiveness of the remediation, and strengthen processes to help prevent recurrence.

### Own operations



For employees, our *Business Integrity* programme manages cases reported through the [Speak Up platform](#). Once a grievance is received, it is formally acknowledged. Where possible, we provide transparency on the progress and expected timeframe of investigations.

Business Integrity Committees are responsible for ensuring timely investigations of alleged or suspected breaches of the Code of Business Principles. The target is to reach a determination within 60 days. More information is available on [Unilever.com](#).

Investigation outcomes are analysed to identify trends and opportunities for improvement. Quarterly, we consolidate case information across geographies to capture lessons learned and develop best practice examples. These insights are shared with functional and country leaders, Code Policy owners, and our wider Business Integrity network.

We strive to ensure grievance mechanisms in our own operations meet the effectiveness criteria of the UNGPs. This expectation also applies to business partners under our RPP. In 2025, we reviewed our grievance mechanisms, policies, and processes to assess performance and address identified gaps.

## Value chain

Business partners, workers in our value chains, communities, and other stakeholders can report suspected or actual breaches of the RPP - including misconduct by Unilever workers or representatives - [via phone or online](#), confidentially and anonymously (where permitted by law). Our [People and Nature Grievance Mechanism](#) also provides a framework for handling, investigating, and resolving social and environmental issues in our supply chain.

Where an audit identifies an issue, we require the business partner to establish a Corrective Action Plan (CAP). Findings classified as “business critical” - significant human rights contraventions - are escalated to Unilever by auditors within 24 hours. Business partners must provide an action plan to address such issues within seven days.

All non-conformances require follow-up audits by an independent third party within 90 days to confirm remediation. In some cases, issues cannot be fully resolved within this period - for example, where significant capital investment or major operational changes are required. In these situations, suppliers must provide an interim plan to mitigate risks until a permanent solution is in place.

To support business partners, we provide [Responsible Partner Policy Implementation Guidance](#), which includes resources and checklists to help prevent, remedy, and avoid recurrence of impacts.

## Engagement with rightsholders

We engage directly with affected rightsholders to better understand the impact on them and ensure that remediation meets their needs. Case studies are published in our Modern Slavery Statements and on Unilever.com.

Where suppliers do not sufficiently engage in remediation, we seek to use leverage through constructive engagement. Termination is considered only as a last resort, when adverse impacts cannot be addressed. Our internal *Responsible Disengagement Guidelines* provide teams with a framework for considering the potential human rights consequences of commercial decisions, including country, regional, or sector exits.

## Monitoring and reporting

### Reporting

We previously published annual reports that detailed our work over the calendar year. However, this cadence restricted us from providing more frequent updates to investors, customers, and other stakeholders as progress occurred. To communicate in a more accessible way to a wider audience, we now provide regular updates on our corporate website in the form of case studies, and we revise this iterative document periodically. We will continue to produce statements and reports required to meet legislative requirements (including the UK Modern Slavery Statement, which can be found in our [online repository](#)), as well as to 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 progress difficult to capture and quantify over time. Best practice in this area continues to evolve, and we are adapting our approach accordingly. We have developed an impact measurement framework that enables us to consistently assess the impact of our human rights strategy. Our measures are aligned with the framework and indicators developed by the AIM-Progress impact measurement working group, strengthening industry-wide alignment on impact reporting. This remains a work in progress, as we refine indicators and improve the quality of available data.

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

Our supplier performance management process focuses on evaluating and improving supplier performance to ensure quality, enhance operational efficiency,



and maintain compliance with our RPP. We provide structured feedback to suppliers, collaborate with them to develop and implement improvement plans, and recognise top performers through awards and incentives. This encourages continuous improvement and strengthens our supplier relationships.

Human rights due diligence is an ongoing process, and we continue to adapt our approach as we learn. We will keep building on our scale and collaborating with other companies, civil society, trade associations, governments, and rightsholders to address the root causes of human rights issues and to drive systemic, lasting change.