Unilever PLC
Unilever House
100 Victoria Embankment
London EC4Y 0DY

+44 (0)20 7822 5252

Unilever responses to BHRC HRDs questionnaire - Sept 2026

1. Since the publication of the Principles in Support of Human Rights Defenders (HRDs) and implementation guidance in 2023, Unilever has further embedded consideration of risks to HRDs within its existing human rights and environmental due diligence processes.

We have carried out a number of human rights impact assessments. The scope of most of these assessments have included consideration of the potential impact to communities in which we operate and source from. The challenge we have is that many individuals and groups don't self-identify, or are not formally identified as HRDs, which means findings specifically linked to HRDs are not commonly reported through HRIAs. In many cases, proxies for HRDs are consulted as part of the process, and risks are documented if these have been identified.

Unilever has taken steps to strengthen our sustainability and human rights policy framework. As part of this process, the Unilever Code of Business Principles and Code Policies has been updated and requires all employees to 'Respect the rights of all individuals and communities who are defenders of human rights and civic freedoms'. We have also incorporated elements of the Principles in Support of HRDs and Implementation Guidance into our new internal HRDD Standard which will be used by site leaders, HR representatives and M&A teams.

We have a grievance mechanism in place to cover social and environmental issues across all our deforestation/conversion risk crops, in line with our People & Nature Policy (UPNP). The UPNP includes our commitment to 'engaging and consulting openly and constructively with HRDs...We condemn any threats, intimidation or reprisals against HRDs.' Incidents reported via this mechanism are published here.

2. What steps does your company take to ensure that affected or potentially affected stakeholders - including local communities, Indigenous Peoples, workers, and civil society organisations - are aware of the "Principles in Support of Human Rights Defenders and implementation guidance for existing commitments and requirements"? Please provide an example of how these commitments have been communicated in practice.

The publication of the Principles in 2023 was also communicated externally through Unilever's human rights channels and stakeholder engagement activities. The document is intended as a living resource and is referenced alongside our wider human rights commitments when engaging with external stakeholders. The Principles are publicly available on Unilever's website and are supported by related public commitments in our Human Rights Policy Statement,

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People & Nature Policy and Responsible Partner Policy (RPP). The RPP Implementation Guidance emphasises meaningful and safe engagement with human rights defenders, civil society organisations, workers, Indigenous Peoples and affected communities.

In practice, awareness is supported through stakeholder engagement activities undertaken as part of our human rights and environmental due diligence processes, including consultations with rightsholders, civil society organisations and local communities. An example of this was a stakeholder roundtable convened in Geneva, which brought together rightsholder representatives, civil society organisations and other stakeholders to discuss Unilever's human rights-related policies and approaches. The discussion provided an opportunity for participants to share perspectives on policy implementation and identify areas for improvement, including ensuring accessibility and meaningful participation for diverse rightsholder groups. Insights from the roundtable have helped inform our ongoing approach to stakeholder engagement and policy development.

3. What steps does your company take to ensure that business partners - including suppliers, contractors, and other relevant business relationships - understand and respect your "Principles in Support of Human Rights Defenders and implementation guidance for existing commitments and requirements"? Please provide an example of how a business partner has engaged with or implemented these principles and guidance.

Unilever's expectations for business partners are embedded in our Responsible Partner Policy (RPP), which applies across our value chain. The RPP includes a mandatory requirement that there is zero tolerance for abuse, threats, intimidation or reprisals against human rights defenders and states that Strategic Lawsuits Against Public Participation (SLAPPs) should not be used to silence defenders or civil society organisations supporting affected rightsholders.

Business partners are required to provide contractual assurances that they meet the requirements of the RPP. Compliance is supported through due diligence processes, supplier onboarding, capability-building activities, audits, grievance mechanisms, corrective action plans and remediation processes where appropriate.

The HRD implementation guidance also contains specific guidance for business partners and is designed to help suppliers and other business relationships understand how risks to defenders can be identified, prevented and addressed as part of their own due diligence activities. While implementation approaches vary by context and business partner, the expectations are integrated into our broader responsible sourcing and responsible business partner programmes.

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4. Please provide an example of how a Human Rights Defender or affected community member safely raised a concern related to your company's operations, projects, or business relationships, and describe the steps the company took to address the concern and prevent retaliation.

Unilever maintains a range of grievance and speak-up mechanisms that are available to workers, community members, civil society organisations and human rights defenders. The Principles and implementation guidance emphasise that grievance mechanisms should be accessible, safe and designed to minimise risks of retaliation.

While we do not generally disclose details of individual cases due to confidentiality, privacy and security considerations, concerns raised through our grievance mechanisms are assessed in accordance with our human rights due diligence and remediation processes. Where a concern relates to potential impacts on a human rights defender or affected community, the guidance requires consideration of retaliation risks, engagement with affected stakeholders where appropriate, and actions to prevent, mitigate or remediate adverse impacts. Measures may include enhanced monitoring, engagement with business partners, corrective action plans and strengthening safeguards around grievance processes.