

# Modern slavery statement

March 2026



Unilever

# Preface

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As the UK Modern Slavery Act reaches its ten-year anniversary, further legislation is emerging around the world to drive responsible business behaviour and help tackle forced labour. However, labour exploitation remains a stark reality in global value chains, with an estimated 27 million adults and children worldwide subject to forced labour. This is devastating for the individuals, their families and communities and society at large.

Forced labour also has a significant impact on the economy. Goods produced with links to forced labour inevitably undercut businesses that act responsibly. Research indicates that approximately £20 billion worth of goods are imported into the UK each year that are at risk of having been produced through forced labour.

We are supportive of human rights due diligence (HRDD) legislation which mandates responsible business action to address human rights impacts, including forced labour. This Statement details the actions we are taking to prevent, mitigate, and where necessary, remediate any forced labour impacts that we have identified.

Collaboration continues to be central to our strategy and is critical to addressing systemic issues effectively. We have engaged with peer businesses through the Consumer Goods Forum (CGF) to develop an Ethical Recruitment Marketplace, which aims to tackle some of the root causes of forced labour relating to migrant workers in global value chains. This Statement includes further details about this and other collaborative initiatives.

Despite unsettling times, respect for human rights remains a non-negotiable foundation for how we conduct business, and we remain wholeheartedly committed to taking action to tackle forced labour.



**Fernando Fernandez**  
Chief Executive Officer, Unilever

This document builds on [last year's statement](#) and explains the steps Unilever has taken to prevent, detect and respond to slavery in our business and throughout our supply chain. This Statement covers Unilever PLC and its group companies, with other reporting companies proceeding with their own board approvals according to the Modern Slavery Act (the 'Act'). It covers the period of 12 months ending on 31 December 2025.

- 1 U.S. Customs and Border Protection, *Intelligent Enforcement Subcommittee Forced Labor Working Group: Forced Labor Issue Paper*, March 2025. Available [here](#).
- 2 Independent Anti-Slavery Commissioner, *Strengthening the UK Forced Labour and Human Rights Legislative Framework*, final report, accessed January 9, 2026. Available [here](#).

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# About Unilever

## Our organisation, structure and supply chain

Unilever is a multinational consumer goods company producing food, drink, personal care, beauty, wellbeing and home care products. About 3.4 billion people use our products every day and consumers worldwide choose from more than 400 Unilever brands. Our brands are available in 190 countries, and we employ approximately 96,000 people. In 2025 our turnover was €50.5 billion with 59% in emerging markets.

We have a large and diverse supply chain with over 6.1 million invoices paid to approximately 76,000 suppliers in 2025. Our upstream value chain includes sourcing raw materials for the manufacture and sale of our products, covering many different crops and packaging materials. Tier 1 suppliers are defined as those who invoice Unilever for goods and services. We also work with suppliers subcontracted by Tier 1 suppliers in our upstream value chain and we partner with third parties to outsource the manufacturing and packaging of certain products, referred to as collaborative manufacturing. Our downstream value chain consists of distributors and large and small retailers across different trading environments and channels as well as agents, franchisers and importers.

Unilever's workforce consists of permanent, temporary and non-guaranteed hours employees. Employees are recruited through direct human resources channels and labour agencies. Our suppliers and business

partners oversee the recruitment of employees for their own operations. They are expected to carry out effective due diligence in line with our **Responsible Partner Policy (RPP)** to manage risks of forced labour, particularly where migrant workers are recruited. Suppliers are also expected to cascade due diligence throughout their supply chains, including monitoring responsible recruitment.

Many of our suppliers rely on migrant workers, who are predominantly recruited through intermediaries such as agents or brokers. Due to the seasonality of many of our raw material crops, workers migrate within their nation state and across borders to work on harvests through informal arrangements that have existed for many years. There are also well-established expatriate migrant routes, such as workers from Bangladesh, Myanmar, Laos and Nepal travelling to Malaysia and Thailand for work. This complexity creates a challenge in effectively managing labour exploitation risk. In response, we take a risk-based approach in our human rights strategy, with specific focus on those rights that are at risk of the most severe negative impact through our activities and business relationships. Further details about salience can be found on our **salient human rights** webpage and in the 'Identifying and assessing potential and actual impacts' section of this Statement.



# Our commitment to human rights: policy and governance

## Governance

Respect for human rights underpins everything we do and is embedded into our organisational structure. The Unilever leadership and its Corporate Responsibility Committee (CRC) oversee governance of our human rights due diligence and risk management. 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.

The Unilever Leadership Executive (ULE) recognises the importance of human rights for the business and the need for their integration in 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 identifies emerging issues for the ULE to consider.

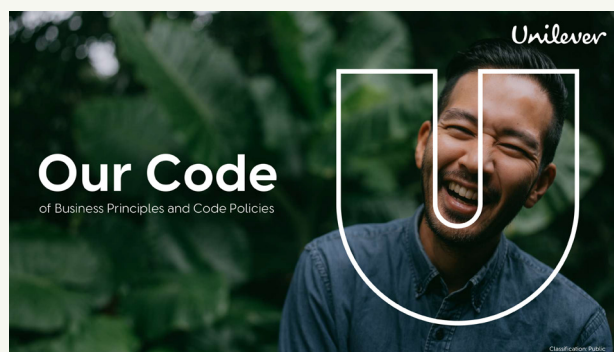
The business is also guided by the Unilever Sustainability Advisory Council, an independent body of external sustainability specialists, including a business and human rights expert, who advise on and challenge our strategy.

We monitor potential and actual human rights impacts in conflict-affected and high-risk areas (CAHRAs). Findings are shared with senior stakeholders, including members of the ULE, as appropriate.

The delivery of our human rights strategy spans across Sustainability and Corporate Affairs, Supply Chain and Procurement, Legal, HR, Finance and our Business Groups. Programmatic work is focused through salient issue action plans, including forced labour.

## 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 senior leadership level. Our publicly available policies on [Unilever.com](https://www.unilever.com) set clear requirements and standards for our people and for the business partners we work with. These policies drive action consistent with our commitments, while assigning responsibility and accountability. In addition, we maintain internal standards and guidance documents that clarify processes such as preventing excessive working hours, carrying out appropriate



due diligence when engaging temporary staff, and following Unilever protocols during land transactions.

The revised Respect, Dignity and Fair Treatment Policy within our updated [Code of Business Principles](#) sets out what employees must do to ensure that all workplaces respect human rights. This includes 'zero tolerance for forced labour, including any form of compulsory, trafficked or child labour'. We expect line managers to 'ensure all work is based on freely agreed and documented terms that employees understand' and 'ensure that no one has paid recruitment fees or related costs to gain employment'.

Our RPP details what we look to from our business partners through 17 Fundamental Principles, including 'Work is Voluntary'. The Mandatory Requirements of this principle include ensuring that:

- Under no circumstances will forced labour be used, whether in the form of trafficked labour, indentured labour, bonded labour or other forms including mental and physical coercion, and slavery.
- Workers enter employment freely and are neither required to surrender any identity or personal papers nor pay a deposit in relation to their employment.

- Workers are free to terminate their employment after a reasonable notice period without penalty, as agreed in the terms and conditions of employment.
- Workers have freedom of movement and are not confined to the business partner's premises, including dormitories or provided housing.
- Workers are not required to pay a fee or deposit in connection with obtaining employment, to the employer or to any person, company or agency involved in the recruitment process.
- Employers are responsible for the payment of all fees and expenses in connection with a worker obtaining employment or incurred in connection to the worker performing their duties. If workers have paid any fees, these must be reimbursed by the employer.
- The use of prison labour is prohibited except in circumstances where their terms and conditions of employment uphold the Mandatory Requirements of this policy and can be verified.

In 2025, we initiated a comprehensive review of our sustainability and human rights policies, standards, guidance, and supporting documents, which have evolved over time. This process aimed to streamline and simplify documents under a consolidated framework, including updating our [Human Rights Policy Statement](#), which we will publish in 2026. We will provide an overview of the outcomes of this work in our next Modern Slavery Statement and on [Unilever.com](https://www.unilever.com).

A key element of this review process has included engagement with rightsholder representatives to ensure that the updated documents reflect their needs and are communicated effectively. We convened a dedicated roundtable at the UN Forum on Business and Human Rights in November 2025, titled 'Listening and Learning from Rightsholders: Perspectives on Human Rights and Livelihoods'. This brought together partners and organisations representing rightsholders in our global value chain to discuss emerging trends shaping human rights and livelihoods. The discussion explored ways to strengthen human rights due diligence through inclusive engagement and examined how our policies can better reflect rightsholders' needs and expectations. Insights from the roundtable will help shape the review of our policies and our human rights strategy, ensuring that rightsholder voices remain central to our human rights work.

We engage internally and externally to raise awareness of, and ensure compliance with, our policies. All business partners are expected to provide contractual assurances that they meet the Mandatory Requirements of the RPP. This is confirmed



through self-declarations at registration and annual re-registration via our supplier management system. We also expect business partners to cascade equivalent requirements within their own supply chains and to carry out their own human rights and environmental due diligence, which helps prevent modern slavery from entering the supply chain. By the end of 2025, approximately 86% of our procurement spend was through business partners compliant with the RPP requirements. All suppliers are continuously assessed against the RPP's mandatory requirements and general terms and conditions. If an existing supplier fails to remain compliant, Unilever may restrict the ability to raise new purchase orders until remediation actions have been completed. New suppliers that do not declare compliance with requirements of the RPP are not onboarded, and Unilever will not conduct business with them.

Business partners are also expected to address any identified negative impacts. To support implementation, business partners can access guidance, training and other resources. Further information is available in the 'Preventing and mitigating forced labour impacts' section of this Statement.

We monitor the effectiveness of our policies through dedicated programmes and committees. For business partners, effectiveness is monitored 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) and in the 'Monitoring the effectiveness and impact of our strategy' section of this Statement.

# Identifying and assessing potential and actual forced labour impacts

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## Forced labour: a salient human rights issue

As a global business operating in 190 countries, our human rights strategy follows a risk-based approach where we assess and prioritise risks based on impact materiality (salient risks) and financial materiality (financial risks). Our 2023 saliency assessment identified forced labour as a salient human rights issue for Unilever. We have an action plan to address forced labour risks and impacts. It draws on leaders across our business, including the Global Human Resources Lead, Head of Safety, Health and Environment, and Global Head of Social Sustainability and Responsible Business. The actions and outputs of this plan are reported throughout this Statement.

In 2026, following the completion of our Ice Cream business demerger, we will carry out a review of our salient human rights risks. This will also evaluate how our business model and practices influence human rights in our own operations and value chain.

## Using data to focus and prioritise

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 Programme
- Historic [Code of Business Principles](#) concerns
- Grievances raised and direct engagement with workers
- Insights from industry experts, civil society, trade unions and peers
- Worker-facing technologies to gather insights from workers about their experiences

In 2025, our procurement team partnered with [LRQA](#), a global risk management partner, to conduct an impact assessment of a selection of the countries we source from and the commodities we procure.

This analysis provided heat maps highlighting forced labour and child labour risks and evaluated how we prioritise these risks to meet legislative human rights due diligence requirements. Findings highlighted opportunities to strengthen our processes for selecting locations for deep dive assessments, review our approach to segmenting suppliers and utilise the heat maps when prioritising focus areas in our strategic planning.

## Identifying forced labour impact in our own operations

We expect everyone at Unilever to be an ambassador for our high ethical standards. Our Business Integrity team provides robust procedures and controls to help us prevent, detect and respond to breaches of our Code of Business Principles (COBP), including forced labour impacts. We analyse COBP concerns to gather insights and identify root causes, then take action to improve our performance. For more information, see our [Business Integrity](#) page on Unilever.com.

## Identifying forced labour impact in our value chain

### Identifying risk using audits

Unilever looks to all high-risk business production item suppliers to conduct site audits, using our preferred methodology, [Sedex Member Ethical Trade Audit](#) (SMETA). Launched in 2024, the SMETA 7.0 introduced changes that strengthen the identification of systemic issues, such as forced labour, by investigating root causes. More information on our due diligence requirements for business partners is available on the [‘Becoming a Unilever supplier’](#) page.

Business partners are expected to create a corrective action plan (CAP) to address any issues identified during an audit. This could include, for example, reimbursing fees paid by workers and returning their original identity documentation to them. Third-party auditors then carry out a review to verify that the corrective actions are sufficient and that the issue has been resolved satisfactorily.

## Deep dive risk assessments

In our previous statement, we indicated plans to conduct a deep dive into potential forced labour and child labour impacts in our tea supply chain in India. This did not go ahead as planned; however, we did carry out an assessment in Vietnam. We partnered with the [Centre for Development and Integration \(CDI\)](#), which engaged with 181 workers across eight sites managed by seven suppliers in Unilever's Vietnam supply chain. The study found significant gaps between formal policy compliance and workers' lived experiences. While suppliers have strong policy frameworks, implementation failures result in risks being insufficiently managed. Key findings relating to forced labour include lack of formal recruitment policies and missing written hiring procedures in place across all facilities. Suppliers are developing action plans that address these findings. In addition, we will review our purchasing practices to evaluate potential impacts on working conditions.

Unilever has commissioned a third-party consultancy to carry out a deep dive human rights assessment focused on recruitment risks relating to internal migration of tea workers in south India. This work will improve our understanding of the potential and actual human rights impacts in this industry and inform our future actions to address these. In 2026, the consultancy will visit sites to engage directly with rightsholders to gather insights, identify root causes and develop actionable recommendations. We will share the findings in our next statement.

## Multistakeholder initiatives

Accurate, relevant and available data is important in building a clear picture of potential and actual forced labour risks. Unilever is participating in a multistakeholder, cross-industry initiative facilitated by [Impactt](#) to develop a freely available map of labour migration corridors at higher risk of recruitment fees and related costs. This resource aims to provide free public access to data on recruitment fees and related costs paid by workers to enable and inform human rights due diligence processes and decisions affecting migrant workers' human rights.

## Assessing and improving grievance mechanism infrastructure to increase visibility of risks and impacts

The seasonal nature of agriculture means that workers engaged in crop harvesting are often employed on an informal and temporary basis. These working conditions increase the risk of forced labour, which is further exacerbated by limited effective channels for workers to raise concerns or issues.

Sugarcane harvesting carries a high risk of forced labour in Brazil. In 2025, Unilever participated in a multi-phase initiative to assess and improve grievance mechanism infrastructure in Brazil's sugarcane sector, to improve identification of impacts. This programme was led by [Oxfam Business Advisory Service \(OBAS\)](#), [Oxfam Brasil](#), [CONTAR](#), and [AIM-Progress](#). The project aims to assess and improve existing grievance mechanisms using the United Nations Guiding Principles on Business and Human Rights (UNGPs) effectiveness criteria. The first phase, completed in July, included consultations with existing mechanism coordinators, demonstrating that both government-led mechanisms assessed and trade unions have been recognised for their high levels of legitimacy and trust.

The second phase involves piloting the grievance mechanism model evaluated in phase one across two sugarcane farming systems, to assess the adaptability and relevance for this group of rightsholders. In late 2025, participatory webinars and initial roundtable meetings brought together grievance mechanism coordinators, CONTAR, local rural worker unions and other civil society organisations. These roundtables aim to map intended users, develop and deliver strategies to engage them, and collectively agree action plans to improve the mechanism.

In 2026, we will collaborate to develop indicators to measure impact. We will provide an update on the progress of these action plans and the impact of these improvements in our next Statement.

# Preventing and mitigating forced labour impacts

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In line with the UNGPs and OECD [Guidelines for Multinational Enterprises on Responsible Business Conduct](#), we address potential human rights impacts through prevention and mitigation measures. Actual impacts are addressed through mitigation and remediation (see [Access to remedy and remediation of forced labour impacts](#) section for more on remediation). Our response to potential and actual adverse human rights impacts considers several factors, including the location of the issue, our leverage, and our relationship to the impact (whether we have caused, contributed to or are directly linked to it).

Our actions to prevent and mitigate forced labour impacts include:

- Embedding effective management systems across our own operations and supporting suppliers to do the same
- Delivering training and capability building with appropriate partners
- Collaborating in partnerships with peer companies, suppliers and expert partners, to address root causes of impacts and drive systemic industry-wide change
- Engaging in advocacy in support of strengthened regulatory requirements that create a level playing field for business to carry out effective human rights due diligence that addresses risks and impacts

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## Training for our employees

All employees are trained on our COBP, which includes human rights requirements. We maintain robust safety protocols and regularly update safety guidance. Further information is available on [Unilever.com](https://www.unilever.com).

Employees have access to learning resources, including short interactive e-learning modules, expert-led webinars, and function-specific training to build deeper expertise.

In August and September, the Responsible Business team shared sessions for procurement colleagues, covering all

aspects of the RPP including forced labour. The team regularly shares case studies and updates on internal channels to raise awareness and show how we support suppliers to remediate impacts.

We 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.

## External training

### Supplier development programme

We are focused on building a supply chain ecosystem where our suppliers champion human rights and workers exercise their rights freely. In our [2025 Statement](#), we provided an overview of our supplier capability building programme (see page 9).

Facilitated by a local implementing partner, participating suppliers complete a human rights due diligence (HRDD) maturity assessment that evaluates their approach to:

- Managing effective grievance mechanisms
- Training and development for managers and workers
- Carrying out risk assessments for workers on-site and in their supply chains
- Taking action on specific issues such as forced labour, child labour, harassment, living wages, freedom of association, and - where relevant - land rights

Our implementation partner works with each supplier to complete the assessment, helping identify issues not typically found during on-site compliance audits.

The programme is being rolled out in phases to ensure effective implementation and engagement. In 2025, 85 suppliers participated across Brazil, Mexico, India, Thailand, Indonesia, the Philippines and Türkiye.

Employees of the participating suppliers were invited to complete in-person and virtual (verbal and SMS) surveys, with 6,099 workers responding. These responses indicated that workers in multiple regions have paid recruitment fees and employers had not reimbursed these costs.

Alongside worker surveys, the maturity assessment carried out by the suppliers in the programme identified gaps including:

- Sufficient policy coverage on key topics such as prevention of forced labour and child labour
- Adequate training on preventing forced labour
- Effective measures to control risks of forced labour and child labour
- Robust due diligence of agencies to effectively implement the Employer Pays Principle

The implementation partners are supporting participating business partners in addressing these findings and monitoring progress. A key success factor is improving awareness of rights for managers and workers, who receive training in person and through digital platforms. Further details can be found on [Unilever.com](#). This programme incorporates learnings from the AIM-Progress [Ganapati Responsible Recruitment Project](#) that we previously participated in and reported on. We will continue to deliver our supplier capability building programme, and may revisit the expanded Ganapati programme at a later date.

### Malaysian Supplier Capability Building Programme

AIM-Progress launched its Supplier Capability Building Programme in Malaysia and Thailand, each attracting over 200 participants, including representatives from 17 Unilever suppliers. Running from November 2025 to May 2026, the initiative aims to strengthen suppliers' ability to implement HRDD, promote responsible recruitment and improve grievance management systems through webinars, in-person events, online training and direct engagement with rightsholders.

The programme is delivered by technical partners [Embo](#) and the [International Organization for Migration](#) supported by Unilever and peer company members. [Quizrr](#) provides monitoring

and evaluation support. The format consists of both online training and in-person events in Bangkok and Kuala Lumpur. The in-person sessions bring together representatives from government, business, and civil society to foster dialogue between brands and suppliers.

Key topics include contracting standards, agency contracting and responsible recruitment, worker engagement and social dialogue, remediation and grievance mechanisms, and, specifically for Malaysia, working conditions. All materials are provided in Thai and English for Thailand, and Malay and English for Malaysia. We will provide an update on this programme in our next statement.

## Building collective capability to address risks in Thailand's sugarcane supply chain

In 2023 a collaborative partnership was launched with funding from Bonsucro Impact Fund and in partnership with the IOM, Diginex, Unilever, peer companies and local organisations to enhance our understanding of human rights risks in Thailand's sugar supply chain. Assessments highlighted risks relating to recruitment practices, with workers predominantly hired through informal channels.

Following the assessment, we worked with the IOM and key stakeholders across three important areas:

- We agreed a multi-pronged corrective action plan with the supplier involved in the assessment, covering risks relating to recruitment practices, working conditions and lack of access to effective grievance mechanisms.
- We co-authored a policy brief with the IOM and Bonsucro to raise awareness of the findings, highlight gaps in Thai labour law enforcement and propose new ethical recruitment and employment standards.
- We participated in capability-building sessions with Thai sugar industry stakeholders, including a public - private roundtable with the IOM and the government's Office of the Cane and Sugar Board to foster dialogue on improving recruitment and employment practices. Further information can be found on [Unilever.com](https://unilever.com).

In addition, we continue to signpost guidance and tools that can be accessed by business partners. In 2025, we developed a digital platform to support suppliers as they progress on their living wage journey. We plan to expand on this with forced labour content in 2026.

## Industry partnerships

We are active members of AIM-Progress and its working groups, collaborating to co-create solutions that collectively advance human rights in our own business and throughout our value chain. Through the CGF, we commit to the Priority Industry Principles,

participate in the Human Rights Coalition, and serve on the steering committee developing an **Ethical Recruitment Marketplace**. The Marketplace aims to establish ethical recruitment as standard practice across industries.

### Consumer Goods Forum Ethical Recruitment Marketplace

Unilever is part of the steering group developing the Marketplace, a joint brand-led initiative that uses market principles to make ethical recruitment the norm across global supply chains. The Marketplace builds on member companies' joint efforts to tackle the economic root causes of exploitative recruitment practices and barriers to ethical recruitment.

The Marketplace will host tools and programmes that form an end-to-end ecosystem for ethical recruitment. It is designed to shift market dynamics by generating demand for transparent and fair recruitment of migrant workers. Interventions will focus on key areas including:

- Responsible procurement practices
- Harmonisation and mutual recognition of labour provider assessments
- Certification maturity pathways for recruitment agencies
- Transparency of recruitment fees
- Inclusive labour monitoring and shared grievance mechanisms
- Capability building to support labour providers and suppliers

The steering group has developed an action plan and key deliverables for 2026. These include setting up governance structures, engaging strategic partners and donor fundraising to support Marketplace expansion. We will provide an update on progress in 2026.

**The Office of the High Commissioner for Human Rights (OHCHR) Helpdesk on Business and Human Rights** is a global resource supporting businesses, states, rightsholders, civil society organisations and other relevant actors to effectively understand and apply the UNGPs. Unilever inputted funding to establish the Helpdesk as it is a key resource for suppliers, particularly SMEs, to build capability to progress their own HRDD and effectively address risks and impacts.

The transport sector is a network of global value chains which we know is vulnerable to forced labour and the trafficking of people. We continue to engage with the **Road Transport Due Diligence Foundation (RTDD)** on worker-centred supply chain monitoring, using innovative approaches tailored to the unique needs of workers in the European road transport sector.

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## Advocacy

Unilever proactively engages in advocacy where our risk exposure is high and our scale enables meaningful impact, including tackling forced labour issues.

We support due diligence legislation which is key to creating a level playing field for businesses to operate responsibly and act on potential and actual human rights impacts within their value chains. During the European Commission's Omnibus proposal negotiations, we endorsed the proposed alignment of the Corporate Sustainability Due Diligence Directive with the UNGPs' recommended risk-based approach to HRDD. In 2026, we will continue to advocate for new and strengthened HRDD legislation including in Canada, Taiwan, UK and Switzerland.

Unilever has participated in the Forced Labour Forum led by the Home Office Modern Slavery Unit. This forum brings together businesses, civil society, academia, NGOs and trade unions, to improve identification of potential and actual forced labour risks, share intelligence and best practice, and boost the quality of transparent reporting under the Modern Slavery Act. The Forum provided key consultation on the revised Section 54 Transparency in Supply Chain guidance, published in March 2025. We also participated in UK government consultations on aligning the UK Modern Slavery Act with international standards and introducing mandatory human rights due diligence in the UK.

Unilever attended the Roundtable on Contemporary Forms of Slavery hosted by OHCHR and [The Freedom Fund](#) in June. The roundtable brought together over 30 senior participants from survivor networks, government, business, philanthropy, trade unions, civil society, academia and the UN. This event marked ten years since the UK Modern Slavery Act was enacted

and explored the need for survivor-centred, rights-based approaches, stronger legal and business accountability, and systemic collaboration. The event underscored the importance of due diligence legislation and the advancement of worker and migrant rights in dismantling structural drivers of modern slavery.

Unilever presented at the [International Labour Organization \(ILO\) Fair Recruitment Initiative](#) Global Conference in May 2025. The conference reviewed a decade of progress on fair recruitment and set priorities on the agenda for 2030. While 110 countries regulate recruitment fees, abuses persist, particularly for migrant workers. Its new strategy focuses on enforcement, sector-specific interventions, digital innovation and empowering workers. Key recommendations included strengthening legal frameworks, supporting labour inspectorates, enhancing partnerships and embedding fair recruitment in business practices. We are using insights from this event to shape our approach to advocacy and collaborative initiatives that drive transformation at scale, including the CGF Ethical Recruitment Marketplace (see [page 11](#)).

Industry benchmarks play an important role in addressing forced labour, identifying where industry improvements are needed, and driving corporate accountability for meaningful action. In 2025, we participated in a workshop hosted by [CCLA Investment Management](#) to input into a review of its Modern Slavery Benchmark. We evolve our approach to ensure that we continue to advance human rights, using external benchmarks to measure our effectiveness. More information about measuring performance is available in the 'Monitoring the effectiveness and impact' section of this Statement.

# Access to remedy and remediation of forced labour impacts

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Effective grievance mechanisms are essential in order for us to listen to, understand, and act on the concerns of our employees, workers in our value chain, and individuals and communities in the areas where we operate. Where an impact is substantiated, we take steps to address it, including expecting suppliers to remediate it, verify the effectiveness of the remediation, and strengthen processes to help prevent recurrence.

## Access to remedy in our operations

For employees, our Business Integrity programme manages cases reported through the [Speak Up platform](#). We formally acknowledge each grievance on receipt and, where possible, provide transparency on the status and expected timeframe of investigations. Our processes provide confidentiality for the person raising the concern and we do not tolerate retaliation for speaking up.

We ensure timely investigations into alleged or suspected breaches of the COBP, including any relating to forced labour. Our target is to reach a determination within 60 days.

We analyse investigation outcomes to identify trends and opportunities for improvement. Each quarter, 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 also applies to business partners under our RPP. In 2025, we reviewed our grievance mechanisms, policies, and processes to assess performance and addressed identified gaps to strengthen our approach.

## Access to remedy in our 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 employees or representatives, [via phone or online](#). Reports can be made 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.

## Remediating impacts

Where human rights risk is identified, we work collaboratively with stakeholders to address it. If the risk materialises and an impact is found to have occurred, we support our business partners in remediation, verify its effectiveness, and put appropriate processes in place that seek to prevent recurrence.

Where an audit identifies an issue, we require the business partner to establish a CAP. 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, business partners must provide an interim plan to mitigate risks until a permanent solution is in place. Business partners should also evaluate the root cause of any forced labour issues identified, which may include:

- Lack of social protections, making workers highly vulnerable to coercion
- Restrictions on mobility because of legal and practical barriers such as visa restrictions or limited alternative employment opportunities or housing
- Exploitative recruitment practices such as charging fees to workers or requiring deposits to secure employment
- Weak regulatory frameworks and enforcement of labour laws

We make resources available for business partners to access, including our [Responsible Partner Policy Implementation Guidance](#), Repayment on Recruitment Fees and Related Costs (available via our RPP Implementation Guidance), and online training on building a responsible recruitment system.

We engage directly with rightsholders, and through third-party partners where appropriate, to understand the impact and ensure that remediation meets their needs.

Where suppliers do not sufficiently engage in remediation, we seek to use our 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.

#### Case study

### Workers paying fees to temporary agency in North America

In January 2025, a third-party audit was conducted at a collaborative manufacturing business partner based in North America. The audit revealed that a temporary agency engaged by the business partner was charging fees to workers, including application costs and drug test expenses.

In response, we looked to the business partner to submit an immediate action plan to address the issue and reimburse affected workers. The Responsible Business team supported the development of an effective CAP, aiming for all active employees linked to the findings to receive prompt reimbursement. The agency

also committed to cease charging any future recruitment fees.

To prevent recurrence, the business partner strengthened its due diligence processes for labour agencies. This included introducing service level agreements focused on ethical recruitment and document checks to monitor ongoing compliance.

A follow up audit in April 2025 confirmed that these issues had been fully remediated. The business partner has since committed to conducting internal biannual audits of its agencies to ensure continued compliance.

We regularly publish case studies about remediating issues identified through our Responsible Sourcing Programme and provide data relating to the audit findings on our [Human Rights webpage](#). In 2026 we will undertake a review of purchasing practices

and recruitment processes to evaluate the impact these may have on exacerbating the root causes of these issues. More information about our 2026 plans is available in the 'Looking ahead' section of this Statement.

# Monitoring the effectiveness and impact

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Our action plan for addressing forced labour risks and impacts includes impact measures that demonstrate progress towards our vision that all workers across Unilever's value chain are free from exploitation.

## Training

Business Integrity training completion rate for in scope online Unilever employees:

99.9%

Buyers across global procurement function attended training sessions on the RPP and responsible recruitment

550+

## RPP compliance

Suppliers compliant with the RPP approximately

86%

## Grievances raised

Supply chain: number of grievances related to forced labour raised through the People and Nature Grievance Mechanism:

0

## Recruitment fees

Amount of recruitment fees agreed to be repaid based on audit findings in 2025:

€54,634

Number of workers agreed to be reimbursed based on audit findings in 2025

952

# Looking ahead

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We continue to align our strategic approach with the UNGPs, evidencing effective risk-based human rights due diligence. In 2026 our forced labour strategy will focus on:

- **Advocacy for robust modern slavery legislation that ensures a level playing field for business and mandates human rights due diligence aligned with the UNGPs.**
- **Reviewing purchasing practices, and analysing compliance costs for SMEs under the RPP.**
- **Evaluating and enhancing recruitment practices and labour agency agreements to reinforce the Employer Pays Principle, ensuring that no employee incurs fees to obtain employment.**
- **Enhancing our impact reporting through the introduction of defined KPIs across detection, prevention, and remediation. This will enable clearer measurement of outcomes for workers, suppliers and systems, and demonstrate the effectiveness of our forced labour action plan.**



**Fernando Fernandez**

Chief Executive Officer, Unilever

This statement has been approved by the Unilever PLC Board at its meeting on 5th March 2026.