

## **Confidential ethics hotline**

At the request of the Audit Committee, a confidential ethics hotline was introduced as part of the actions required by the Sarbanes-Oxley legislation in the United States, to ensure that employees could anonymously submit concerns regarding accounting and auditing issues. This facility was extended at the request of the Board to the handling of all Code of Business Principles issues. The ethics hotline is available 24 hours a day, 365 days a year.

People who are aware of a violation of the Code of Business Principles are encouraged to use the normal channels to report their suspicions - through their line manager or HR director. But the hotline provides an extra method for people who wish to report issues.

If any employee reports, in good faith, what they consider to be illegal or unethical activities, they need not be concerned about retaliation from others, and Unilever will take disciplinary action against any employee involved in retaliation. This may include action up to, and including, termination of employment.

## **Reporting and Recording Breaches and Frauds**

A record of all breaches of the Code is monitored by Company Chairmen and available in operating companies.

All breaches of the Code are regarded as serious and treated as such.

However, some breaches and frauds are so significant that reporting must be made to the Code of Business Principles Committee. These include: -

- breach of Code involving misuse of money, assets, information and wrongful conduct or behaviour where the loss exceeds €10,000
- breach of Code the result of deliberate and systemic acts by one or more employees
- any breach which has the potential to damage the corporate reputation
- any allegation of a bribe, given or received
- a breach following investigation of which dismissal or suspension of a manager is proposed.

This is not an exhaustive list and management will use their discretion as to whether reporting is appropriate even if the above criteria are not met.

## **Method of Reporting by management**

Reporting to the Code of Business Principles Compliance Committee can be in writing, via fax or e-mail.

The initial report should be made within a week of discovery, with whatever level of detail is known initially.

Following the initial alert, the aim is to send a full report, together with recommendations for remedial action, sanctions etc., within a month.

Any further investigations and reporting that may be necessary must be agreed with the

Code of Business Principles Compliance Committee.

Each quarter end management will supply:

- A collected summary of all breaches reported to the Code of Business Principles Compliance Committee during that quarter, along with an update on breaches reported to the Code of Business Principles Compliance Committee in previous quarters in respect of which actions remain outstanding or investigations continue; and
- the total number of all other breaches of the Code during the quarter in question, categorised by type.

### **Code of Business Principles Compliance Committee**

This Committee consists of the two Joint Secretaries, the Chief Auditor, the SVP HR Development and the Head of Corporate Relations. It meets quarterly to review the reports from management (including breach reports originating through the ethics hotline), to agree any further investigations and reporting which may be necessary, and to decide if issues need to be brought to the attention of UEX, the Audit Committee, the External Affairs Committee or the Board.