



# Unilever Ventures Responsible Partner Policy

Our Responsible Partner Policy (RPP) and its Fundamental Principles embody our commitment to responsible, transparent and sustainable business. Our RPP describes what Unilever Ventures requires from its portfolio companies and fund partners so we can do business together responsibly.

**Embedding human rights and committed to fighting corruption** In line with the UN Guiding Principles on Business and Human Rights, we are committed to respecting internationally recognised human rights. We base our human rights commitments and policy, including the Fundamental Principles of our RPP, on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises. We are committed to doing business with integrity, consistently demonstrating high global standards, and fighting corruption in all its forms. We expect our partners to adhere to values and principles consistent with our own.

**Protecting and preserving the environment** We are committed to conducting business through an approach that embraces sustainability and increases our positive impact on the environment. This includes investing in companies that are managing operations, sourcing, manufacturing and distributing products, and supplying services in ways that protect and preserve the environment. Here we address holistic environmental sustainability, with emphasis on climate, water, waste, biodiversity, no deforestation and plastic. We are committed to working with you to achieve the Fundamental Principles of our RPP and recognise our responsibilities.

The Fundamental Principles of our RPP are organised into three main pillars:

- Business Integrity & Ethics
- Human Rights
- Planet

We recognise that these three pillars are increasingly interconnected and interdependent, and therefore you need to consider them together to meet the requirements. Each Fundamental Principle of our RPP provides guidance on what Unilever Ventures expects of our responsible and sustainable portfolio companies and partner funds. You are expected to determine and take responsibility for the steps required for your organisation to be able to meet or exceed the Mandatory Requirements of our RPP.

Unilever Ventures team

# BUSINESS INTEGRITY & ETHICS

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## Compliance with laws

- All laws and regulations are complied with, and required permits are held for the countries where the business operates.

## Anti-bribery & corruption

- All forms of corruption, including bribery, extortion and embezzlement, are prohibited and prevented through adequate and proportionate procedures. Bribery of public officials or private organisation officials, as well as facilitation payments and other forms of corruption (for example, fraud or theft), are all covered by this prohibition. Any breach of this requirement is promptly disclosed to Unilever.
- The business must report any attempt by Unilever employees to solicit bribes through our [speak-up channels](http://www.unilevercodesupportline.com) at [www.unilevercodesupportline.com](http://www.unilevercodesupportline.com).

## Gifts and hospitality

- Gifts or hospitality offered to Unilever Ventures or Unilever employees are not intended to influence decisions by Unilever Ventures or Unilever and are legitimate, proportionate and respectful of Unilever's internal policies, which limit significantly the acceptance of gifts and hospitality.

## Avoiding conflicts of interest

- All business transactions are free of conflicts of interest. Any material ownership or beneficial interest in the business by a public official, representative of a political party, Unilever Ventures or Unilever employee or their relatives are declared to Unilever Ventures prior to any business relationship with Unilever Ventures so that we can take appropriate action.
- Any other conflict of interest in any business dealings with Unilever Ventures is declared to allow Unilever Ventures the opportunity to take appropriate action.

## Protecting Unilever's information and property

- Unilever, Unilever Ventures, or any other party's confidential information, know-how and intellectual property are respected and safeguarded.
- All information provided by Unilever or another party that is not in the public domain is deemed confidential and only used for its intended and designated purpose.

## Accurate records, anti-money laundering and economic sanctions compliance

- All business and commercial dealings are transparently performed and accurately recorded in a timely manner.
- Confidential information regarding Unilever Ventures, Unilever, or any other company is not used to either engage in or support insider trading.
- All economic sanctions, anti-money laundering and anti-tax evasion legislation and rules must be complied with. Any suspicions of occurrence of any of these issues are promptly reported to Unilever, and effective steps are taken to mitigate risks.

## Competitor information

- All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations.
- No attempt is made to divulge to Unilever Ventures, or to any other party, any commercially sensitive or confidential information about competitors.
- Unilever's commercially sensitive or confidential information is not used for other business purposes or shared with any third party unless expressly permitted by Unilever.

## Data ethics and privacy

- Personal data is collected, processed, stored, transferred and disposed of in line with applicable laws and with respect to the protection of privacy as a human right.
- The risk to individuals when using their personal data is always considered, and steps are taken to mitigate those risks and restrict the collection or use of personal data to only the purpose it is being collected for.

## Product specifications and quality

- Products, materials and services meet relevant specifications and quality and safety industry norms for such items. They also comply with all applicable legal and regulatory requirements.
- Where relevant, the business conducts research and development activities responsibly, follows good clinical practice and generally accepted scientific, technological and ethical principles.

## **Animal welfare**

- No animal testing is carried out by the business on products, product ingredients or materials.

## **Responsible sourcing**

- The business has its own Code of Conduct and Responsible Sourcing Policy (“Policies”) or similar to enable the business to meet these Mandatory Requirements or, if it does not, it will create and implement its own Policies or similar to enable it to do so.
- The business will identify, prevent, mitigate and account for how it addresses and manages potential and actual adverse human rights and environmental impacts that it may cause or contribute to through its own activities or business relationships.

# HUMAN RIGHTS

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## Freely Agreed Terms of Employment

- All workers, both permanent and casual, are provided with employment documents that are freely agreed and which, at a minimum, respect their legal and contractual rights.
- Key components of the employer–worker relationship, including hours, overtime, pay, benefits, leave, and disciplinary and grievance systems, are freely agreed upon by the worker, documented in writing, and formally acknowledged by the employer and worker before the start of employment.
- Terms and conditions of employment are in a language understood by the worker, are explained verbally or diagrammatically if required, and are available throughout employment.
- All workers receive a copy of their terms and conditions of employment in a language they understand for their records that matches those the employer has on file.
- Any changes to the terms and conditions of employment are agreed in writing by both worker and employer.
- Where required by law, short-term, casual or agency workers are hired as permanent employees where the work involved is of a regular nature and is required all year round.
- Workers are entitled to maternity, paternity, adoption or parental protection, leave and benefits as required by law.

## Free from Discrimination

- There is no discrimination in employment (including hiring), any aspects of training, personal and professional development, compensation, advancement, discipline, employment termination or retirement.
- Discrimination based on race, ethnicity, age, role, sex, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership, personal characteristics, disease, health status or political views, or on any other grounds stated by local law is prevented.
- Engaging in, supporting or tolerating discrimination is prohibited.
- Any forms of health screening that might result in discrimination are not tolerated. When health tests are mandated under local laws, the results cannot be used to dismiss workers or otherwise discriminate against them or treat them unfavourably.

## Free from Harassment

- Workers are treated with dignity and respect. Physical, sexual, verbal or psychological abuse, any form of harassment, hate speech, intimidation, bullying, violence and corporal punishment are not engaged in or tolerated.
- Disciplinary measures are proportionate and do not include physical or mental punishment.
- All workers, and specifically managers, supervisors and site security, who subject workers to harassment or abuse are subject to appropriate disciplinary measures.
- There is zero tolerance for any abuse, threats, intimidation or reprisals against human rights defenders.

## Work is Voluntary

- 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'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 these Mandatory Requirements and can be verified.

## Appropriate Age

- Under no circumstances are individuals employed under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher.
- Responsible remedial measures are immediately implemented whenever any workers under the age of 15 are identified. These measures include immediately removing the child from all work and ensuring they are in a safe environment. Care and education of the child should be provided along with security of the same income to the family.
- In all circumstances, the health and safety of young workers (between 15 and 18 years of age) are considered and protected. This protection should preclude them from certain types of work, such as hazardous or night work, and requires extra care and commitment, ensuring that they must not do work that is mentally, physically, socially or morally dangerous or harmful.

## Fair Wages

- All workers are provided with a total compensation package for a standard working week that includes wages, overtime pay, benefits and paid leave which meets or exceeds legal minimum standards.
- Compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
- Wages are paid, on time, regularly and in full.
- Workers receive a pay slip for each pay period, clearly indicating the components of the compensation, including exact amounts for wages, specifying regular and overtime hours worked (where workers are paid on an hourly basis) and benefits, incentives/bonuses and any agreed deductions.
- Where a worker is paid based on volume output, piece-rate, quotas or similar, the pay rate allows the worker to be able to earn at least the equivalent of the minimum or collective agreement wage, whichever is higher, during normal working hours.
- All overtime work or work on statutory holidays is paid at the appropriate premium rate according to local legal requirements and/or collective bargaining agreements.
- Other than legally mandated deductions, all other deductions from wages are made only with the express and written consent of the workers in a language they understand.
- All legally mandated deductions, such as taxes and social or health insurance, are deposited each pay period in the legally stipulated accounts or agencies and as required by law.

- Insurance is taken to cover workers in the case of any work-related injuries, accidents, illness, invalidity and death in accordance with local worker compensation laws, as a minimum.

## Reasonable Working Hours

- Workers are not required to work more than the regular and overtime hours according to local legal requirements. Total weekly working hours including overtime must not exceed 60 hours for non-management workers even if local law would otherwise allow it, in order to prevent excessive physical and mental fatigue.
- All overtime is on a voluntary basis. If the employment contract allows for contractual overtime, then workers expressly agree to it.
- Workers are entitled to at least 24 consecutive hours of rest in every seven-day period, and to take legally required annual leave.
- If workers are required to work on a rest day due to a genuine need for continuity of production or service, workers must receive an equivalent period of compensatory rest immediately following to ensure a minimum of two days' rest in every 14 days.
- Workers are entitled to reasonable meal and rest breaks, which, at a minimum, must comply with applicable laws.

## Freedom of Association

- All workers can freely exercise their right to form or join a union of their choice, to seek representation and collectively bargain and do so without fear of intimidation, harassment or obtaining prior approvals, unless legally required
- Workers know and understand their rights, including any legal right to strike. No other worker, manager or other company representative impedes them in the enjoyment of these rights.
- Collective bargaining negotiations are entered into in good faith when requested from any legally recognised representative group of workers and collective agreements are concluded and implemented.
- Worker representatives are not discriminated against, and unfair labour practices do not take place against them because of their role as worker representatives. They have reasonable access to carry out their representative functions in the workplace.
- Where local law sets restrictions on the right to freedom of association and collective bargaining, alternative forms of worker representation, association and bargaining are allowed.

# PLANET

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## Health & Safety

- A healthy and safe workplace is provided to prevent accidents and injury, or illness (either physical or mental) arising out of, linked with or occurring in the course of work, or as a result of the employer's operations.
- All workers and other people who enter business premises are clearly informed about the inherent dangers of the workplace and are provided with adequate knowledge and personal protective equipment to avoid such dangers, and there is clear and appropriate signage or information provided on how to evacuate in the case of an emergency.
- All workers, visitors, and people who enter the premises to provide any operational services or deal with products are properly trained and informed about the appropriate actions to take should a health and safety incident occur.

## Access to Grievance Mechanisms & Remedies

- 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 UN Guiding Principles on Business and Human Rights 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.

## Protect and Regenerate Nature

- Current and valid legal permits and requirements relating to planning, development and business operations, with respect to the protection of the environment, nature and biodiversity, are held and complied with.
- Applicable laws and permits relating to water – including but not limited to water abstraction, water usage, surface water management and effluent discharge – are complied with.

## Climate Action

- All applicable legal requirements are complied with and permits held with respect to GHG emissions management and reduction.

## Waste-free World

- Applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors are complied with.
- Waste is stored, handled, transported and disposed of in a way that protects the health and safety of people and also protects the environment.
- All applicable legal requirements with respect to plastics are complied with.