



DISCLOSURE MATERIALS

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire and B Lab deems them to be material, the company must:

- 1) Be transparent about the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue.
- 3) Demonstrate that management systems are in place to avoid similar issues from arising in the future.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to background checks by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.

DISCLOSURE QUESTIONNAIRE

Company Name: Unilever ANZ
 Date Submitted: 05/27/2022

Industries & Products	Yes	No
Please indicate if the company is involved in production of or trade in any the following. Select Yes for all options that apply.		
Animal Products or Services		✓
Biodiversity Impacts		✓
Chemicals	✓	
Company Explanation Of Disclosure Item Flags		✓
Disclosure Alcohol		✓
Disclosure Firearms Weapons		✓
Disclosure Mining		✓
Disclosure Pornography		✓
Disclosure Tobacco		✓
Energy and Emissions Intensive Industries		✓
Fossil fuels		✓
Gambling		✓
Genetically Modified Organisms		✓
Illegal Products or Subject to Phase Out		✓
Industries at Risk of Human Rights Violations	✓	
Monoculture Agriculture		✓
Nuclear Power or Hazardous Materials		✓
Payday, Short Term, or High Interest Lending		✓
Water Intensive Industries		✓
Tax Advisory Services		✓

Supply Chain Disclosures	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		✓
Child or Forced Labor		✓
Negative Environmental Impact	✓	
Negative Social Impact		✓
Other		✓

Outcomes & Penalties	True	False
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		✓
Breaches of Confidential Information		✓
Bribery, Fraud, or Corruption		✓
Company Explanation Of Disclosure Item Flags		✓
Company has filed for bankruptcy		✓
Consumer Protection		✓
Financial Reporting, Taxes, Investments, or Loans		✓
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		✓
Labor Issues		✓
Large Scale Land Conversion, Acquisition, or Relocation		✓
Litigation or Arbitration		✓
On-Site Fatality		✓
Penalties Assessed For Environmental Issues		✓
Political Contributions or International Affairs		✓
Recalls		✓
Significant Layoffs		✓
Violation of Indigenous Peoples Rights		✓
Other	✓	

Practices	True	False
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		✓
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		✓
Company Explanation Of Disclosure Item Flags		✓
Company prohibits freedom of association/collective bargaining		✓
Company workers are prisoners		✓
Conduct Business in Conflict Zones		✓
Confirmation of Right to Work		✓
Does not transparently report corporate financials to government		✓
Employs Individuals on Zero-Hour Contracts		✓
Facilities located in sensitive ecosystems		✓
ID Cards Withheld or Penalties for Resignation		✓
No formal Registration Under Domestic Regulations		✓
No signed employment contracts for all workers		✓
Overtime For Hourly Workers Is Compulsory		✓
Payslips not provided to show wage calculation and deductions		✓
Sale of Data		✓
Tax Reduction Through Corporate Shells		✓
Workers cannot leave site during non-working hours		✓
Workers not Provided Clean Drinking Water or Toilets		✓
Workers paid below minimum wage		✓
Workers Under Bond		✓
Other		✓

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Unilever ANZ

UPDATED AS OF:

05/27/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Supply Chain Human Rights Risks
TOPIC	Allegations of child/forced labour risks in the company supply chain.
SUMMARY OF ISSUE	Company sources from high risk human rights supply chains such as palm oil.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Palm oil based ingredients account for 2.8% of overall Unilever ANZ supplier expenditure.
IMPACT ON STAKEHOLDERS	Accusations from advocacy groups include systematic abuses in palm oil supply chains.
IMPLEMENTED MGT PRACTICES	<p>Unilever has a Human Rights Policy and Responsible Sourcing Policy which sets out expectations and requirements to our suppliers with regards to respect for human rights, including labour rights, of the workers in our extended supply chain.</p> <p>The company publishes a Human Rights Report which highlights the work done to continue implementing the UN Guiding Principles on Business and Human Rights. The Unilever Modern Slavery report outlines the processes and targets in place to identify and mitigate risks to human rights in the supply chain.</p> <p>Unilever's palm oil suppliers are expected to adhere to their People and Nature Policy throughout their operations and supply chains. The four principles for sustainable sourcing include respecting and promoting human rights, protecting natural ecosystems from deforestation and conversion, being a force for good for nature and people and transparency and traceability. Covering multiple commodities, this replaces the Palm Oil Sourcing Policy, which built on and extended the Roundtable on Sustainable Palm Oil (RSPO) Principles & Criteria (P&C), including the prevention of forced labour, and have in place methods to monitor and enforce compliance.</p> <p>Unilever has a grievance mechanism in place for palm oil and publish a list of grievances to provide transparency on the progress that they and their palm oil suppliers make on specific issues. The company publishes a full list of their direct suppliers, mills and palm oil facilities on their website as well as a list of suspended suppliers so they openly communicate who they will no longer work with.</p>
OTHER MANAGEMENT COMMENTS	<p>Unilever actively participates in the RSPO Human Rights Working Group (HRWG), helping to strengthen implementation of the standards, and support members' ability to deliver on their sustainability commitments.</p> <p>Unilever is a member of the Consumer Goods Forum's Human Rights Coalition, the company works in collaboration with peer companies and expert organisations to develop and implement human rights due diligence from the refinery to the plantation level.</p> <p>As a member of the Palm Oil Collaboration Group, the company launched and co-convened the Social Issues Working Group (dedicated to labour and land issues) to accelerate change and impact together with companies from every stage of the palm oil supply chain.</p>

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Supply Chain Human Rights Risks Cont.
REPORTS	<p>Links to the following reports are available on the palm oil section of the Unilever and Unilever ANZ websites:</p> <ul style="list-style-type: none"> • Unilever human rights policy statement: https://assets.unilever.com/files/92ui5egz/production/b1943aa804e0b9817f826feedfaf1e7179ce51e0.pdf/unilever-human-rights-policy-statement.pdf • Unilever Responsible Sourcing Policy: https://assets.unilever.com/files/92ui5egz/qa/93055db1df9d3c3f24e88c3f72ee841d90fa7700.pdf/responsible-sourcing-policy-interactive-final.pdf • Unilever Palm Oil Grievance Tracker: https://assets.unilever.com/files/92ui5egz/production/ab41ce472680816623a2f4428e9703765726742b.pdf/unilever-palm-oil-grievance-tracker-nov2021-regular.pdf • Grievance Procedure for Sustainable Palm Oil: https://assets.unilever.com/files/92ui5egz/production/564966a883e6160aeee155d8b6a47b3562c78bfc.pdf/palm-oil-grievance-procedure.pdf • Suspended Palm Oil Suppliers or Growers List: https://www.unilever.com/files/origin/90830e5092ce393caff8582ddc3d8c98b68c5295.pdf/unilevers-suspended-palm-oil-suppliers-and-growers-with-mill-list-updated-june-2021.pdf • Unilever ANZ Modern Slavery Statement: https://www.unilever.com.au/unilever-australia-modern-slavery-act-transparency-statement/

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UPDATED AS OF:

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DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Environmental Risks in the Supply Chain
TOPIC	Company sources from high risk environmental risk supply chains such as palm oil.
SUMMARY OF ISSUE	The company sources from various supply chains that have been called out by advocacy groups for their negative environmental impacts.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The company has made environmental commitments related to their palm oil (2.8% of supplier expenditure), soy (0.1% of supplier expenditure), cocoa (3.1% of supplier expenditure), and paper and board (3.2% of supplier expenditure) supply chains.
IMPACT ON STAKEHOLDERS	Allegations from advocacy groups include plastic pollution, deforestation, and green washing
IMPLEMENTED MGT PRACTICES	<p>The company has set out a range of ambitious actions to fight climate change and protect nature as part of the Unilever Compass. Targets to help protect and regenerate nature include:</p> <ul style="list-style-type: none"> • empowering farmers and smallholders to protect and regenerate farm environments; • to create a deforestation free supply chain by 2023 for palm oil, tea, soy, cocoa, paper and board; • to help protect and regenerate 1.5 million hectares of land, forests and oceans by 2030; • to source 100% of their key agricultural crops sustainably. <p>The Unilever Sustainable Agriculture Code and Responsible Sourcing Policy, along with the Unilever Regenerative Agriculture Principles provide the basis for the sustainable sourcing programme. The Regenerative Agricultural Principles look at metrics such as:</p> <ul style="list-style-type: none"> • Number and variety of crops in the rotation • Number and abundance of species, i.e. insects, earthworms, birds, rodents, predatory birds • Presence of landscape elements which provide habitats for animal species (e.g. field margins, ponds, hedges, windrows, shadow trees, pockets of forest or coppice) • Soil microbial biomass and diversity <p>The company also monitors supplier compliance using the No Deforestation, No Expansion on Peat and No Exploitation Implementation Reporting Framework (NDPEIRF) available at ndpeirf.net. The company's People and Nature Policy also outlines certification standards such as how they work with suppliers and measure traceability. The Regenerative Agriculture Principles were developed in conjunction with the following third parties: International Institute for Environment and Development; NAIB UK; Proforest UK; CLM The Netherlands.</p> <p>Unilever also works with third parties on projects to help regenerate nature. One example is the Palm Oil project in Malaysia with WWF - The WWF Sabah Landscapes programme supports the Roundtable on Sustainable Palm Oil (RSPO) certification of 60,000 hectares of oil palm plantations which helps protect the land from further clearing.</p>

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PROVIDED BY: **Unilever ANZ** UPDATED AS OF: **05/27/2022**

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Outcomes & Penalties
TOPIC	In 2011 Unilever Australia was investigated by the ACCC (Australian Competition and Consumer Commission) in relation to the supply in Australia of concentrated detergent products by Unilever, Colgate-Palmolive Australia (Colgate), PZ Cussons Australia (Cussons) and Woolworths between 2008 and 2009. The ACCC alleged that the parties had engaged in conduct in breach of Australian competition laws.
SUMMARY OF ISSUE	Following the investigations, in 2013 the ACCC took legal action against Colgate, Cussons and Woolworths alleging they, with Unilever, agreed to stop supplying standard concentrate detergent in favour of ultra-concentrate detergent between 2008 and 2009. Unilever fully co-operated with the investigations and the ACCC granted immunity to Unilever and relevant ex-employees as part of the investigations. Unilever preserved its immunity throughout, including by cooperating with the ACCC throughout the litigation which culminated in financial penalties being imposed against Colgate and Woolworths.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Unilever was granted immunity and no financial penalty was imposed.
IMPACT ON STAKEHOLDERS	As the concentrated products were smaller in size, consumers seeing them for the first time might be confused into believing the larger packs were better value. Colgate admitted that it and Unilever shared sensitive market information, including information about when they would increase the price of their laundry detergents, through telephone contact between Colgate managers and senior Unilever executives, including Unilever's sales director at the time. The information sharing started as social calls, but turned to unlawful exchanges of pricing information.
RESOLUTION	<p>In early 2016, Colgate admitted their involvement in entering into understandings, which limited the supply, and controlled the price, of laundry detergents, and sharing market sensitive information regarding laundry detergent price increases. Colgate was ordered to pay penalties totaling \$18 million.</p> <p>In the same year, Woolworths admitted being knowingly concerned in the making of, and giving effect to, an understanding to cease supplying standard concentrate laundry detergents to Woolworths in early 2009 and supply only ultra concentrates to Woolworths from that time, and was ordered to pay \$9 million in penalties. The Court dismissed the case against Cussons in 2017.</p>
IMPLEMENTED MGT PRACTICES	<p>In 2011 Unilever replaced the leadership of Unilever ANZ following internal investigation of the matter. The replacements included the CEO and Sales Director. It introduced and maintains a broad competition law compliance program which includes both compulsory annual online training, face to face training, and written materials. Governance was improved, including appointment of legal counsel to the board of Unilever Australia.</p> <p>The company outlines their Anti Competitive/Antitrust practices in their Code of Business Principles and Code Policies available here: https://assets.unilever.com/files/92ui5egz/production/3658b4c9c7a33bd719b8dd98d0f7621446e7fa6d.pdf/2021-code-of-business-principles-english.pdf</p>
REPORT	ACCC release: https://www.accc.gov.au/media-release/accc-takes-action-against-alleged-laundry-detergent-cartel

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Disclosure Outcomes & Penalties Cont.
OTHER MANAGEMENT COMMENTS	<p>Unilever fully co-operated with these investigations since their inception in 2011. As part of these investigations, Unilever commenced its own internal investigation and conveyed its findings to the ACCC and the NZCC.</p> <p>The company has already taken firm action in response to the regretted past behaviour of a small number of ex employees discovered in its own investigations, including:</p> <ul style="list-style-type: none"> · The introduction of new leadership to the Australia & New Zealand business including the appointment of a new Australian Chairman and CEO in 2012; · The imposition of strong disciplinary sanctions on all relevant individuals. At this time, none of those individuals remain employed by Unilever.



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UPDATED AS OF:

05/27/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Chemical Intensive Industry
TOPIC	Company operates in an industry that is reliant on chemicals in the manufacturing process.
SUMMARY OF ISSUE	Unilever ANZ operates in the personal care industry and uses regulated hazardous chemicals in their manufacturing process. This includes chemicals with GHS's highest hazard classification (i.e. category 1).
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>Unilever ANZ uses two chemicals on the European REACH restricted list as ingredients in the manufacture of Unilever ANZ anti-perspirant deodorant products. These chemicals have some restrictions in the EU, but are not prohibited for use in the EU, and are used by Unilever ANZ in compliance with ANZ limits and restrictions.</p> <p>In FY2021, Unilever ANZ produced anti-perspirant deodorant products in which these chemicals were used, as emollient ingredients. Products produced accounted for 6% of the company's overall revenue in that year.</p>
IMPACT ON STAKEHOLDERS	Industries that rely on the use of chemicals, including chemicals of very high concern, pose both human health risks to those exposed to such chemicals as well as environmental risks if the use and disposal of chemicals is not properly managed.
REPORT	<p>Your ingredient questions answered:</p> <p>https://www.unilever.com/brands/whats-in-our-products/your-ingredient-questions-answered/</p>

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DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Chemical Intensive Industry Cont.
TOPIC	Company operates in an industry that is reliant on chemicals in the manufacturing process. Cont.
IMPLEMENTED MGT PRACTICES	<p>Unilever has strict safety and quality controls in place to ensure uses of chemical ingredients comply with applicable laws and regulations, Unilever's internal safety assessments, and consumer preferences. Unilever ANZ's uses of chemicals include use as ingredients in its products, and for cleaning and sanitation purposes.</p> <p>Unilever Safety and Environmental Assurance Centre Unilever has a dedicated team of scientists housed in the Unilever Safety and Environmental Assurance Centre, the primary purpose of which is to assess the safety and environmental sustainability of products and their ingredients, including to ensure they are safe for the people who use them, employees and the environment. The safety assessments consider two key factors – hazard and exposure – in determining the level of risk of an ingredient or a product.</p> <p>Chemical ingredients Unilever ANZ assess permissibility of use of all chemical ingredients for under the Australian Industrial Chemicals Introduction Scheme (AICIS, https://www.industrialchemicals.gov.au/). This regime is similar to the EU's REACH regime. Both AICIS and REACH assess ingredients for their human health and environmental risk. Unilever ANZ maintains an inventory of chemical substances they are responsible for importing, which highlights usage restrictions, and links to associated risk assessments.</p> <p>Unilever ANZ also checks for compliance with the Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP), Australian legislation monitored by the Australian Therapeutic Goods Administration, and the New Zealand Cosmetic Products Group Standard maintained by the NZ Environment Protection Authority. In addition, Unilever ANZ complies with the requirements of the Australian and New Zealand work safety regulators, including Safe Work Australia, which requires manufacturers or importers of chemicals supplied to workplaces to determine if a chemical is hazardous and to classify and manage it using the Globally Harmonised System (GHS 3 or 7). Safety data sheets highlighting the classification of Unilever's personal care and homecare products and their ingredients are available.</p> <p>Safety and Environment For site safety management, as part of the Site's ISO 14001 certified Environmental Management System, risks have been identified and controls and procedures have been put in place to manage safety and environmental risks, including safe usage and disposal of chemicals.</p> <p>Unilever ANZ currently contracts with waste management specialist partners to manage the company's wastewater treatment plants (WWTP). At all sites, the Chemical Oxygen Demand (COD) of the site's wastewater is measured and reported. Opportunities to improve wastewater and associated chemical usage have been identified and are tracked through consistent monitoring. Investments have been made through automatic dosing, process improvements and tank replacements to ensure more accurate chemical usage.</p> <p>Wastewater samples are taken to ensure the quality of discharged water is within discharge targets as agreed with local water regulators. In addition, monthly formal meetings are held with Unilever Engineering, Unilever Quality and WWTP contractors to review progress and improvement opportunities. A "Clean Tech Funding" program has been set up to provide the funds required to improve various sustainability initiatives including the quality of wastewater produced at Unilever ANZ's sites.</p>