

Complaints Policy (incl. GDPR complaints)

1. Background

In the first instance, a complaint should be discussed with the UPP Daily Management team (via GPT@unilever.com) to avoid unnecessary completion of the formal complaint procedure described below. They will carry out an initial examination of the grievances and inform the interested party within one month of the application whether the complaints can be remedied immediately, or whether a more thorough investigation is required, and the formal complaints procedure must be followed. It would be useful to bring any supporting documents to their attention. The Daily Management team will be able to initially assess your complaint. The Daily Management team can assist you with writing to the Board or the Compartment Committees¹ (as relevant) and gathering relevant documentation.

2. Who can file a complaint? - Definitions

Only an interested party can submit a complaint within this procedure.

The person concerned is understood to mean the person who has rights at the expense of the pension fund in implementation of the articles of association and/or the plan rules and/or the law.

It may refer to:

- An active participant,
- A deferred beneficiary,
- A pensioner,
- A beneficiary,
- One of the companies that is a member of the pension fund.

A complaint is understood to mean a formal declaration by an interested party in which he states that he believes that he has been violated in the way in which the articles of association and/or the plan rules of the pension fund are applied.

A complaint can also relate to Data Protection (GDPR complaints).

A dispute with an interested party concerning the performance of his function within the pension fund (Board or Committee) is not covered by this complaint procedure.

In this complaint procedure, the terms have the same meaning as in the articles of association and/or the plan rules of the pension fund.

¹ Committee in this context means for each UPP Compartment:

International Compartment (IPP) = UPP Daily Management Team

Defined Benefit Netherlands Compartment = Dutch Compartment Committee

Defined Benefit Ireland Compartment = Irish Compartment Committee

Defined Benefit Belgium Compartment = Belgian Compartment Committee

3. How should a complaint be filed?

If an interested party has a complaint, he or she can send a letter to the Board of Directors, the Compartment Committee or the UPP Daily Management team (via GPT@unilever.com)

In that letter, the interested party gives a description of the complaint and all the information about it, for example the date, the facts, the reason why the interested party believes that he has been treated unfairly, the steps already taken, etc... The documents supporting the complaint are added to it.

4. Which complaints should be considered?

A complaint must meet a number of conditions in order to be taken into account:

- The interested party must have submitted the complaint to the pension fund for an initial investigation at least one month before the start of the formal complaints procedure).
- The complaint must state the name and coordinates of the person who submitted it and be signed by the complainant.
- The complaint may not concern facts that are already the subject of a complaint that is pending, or of a complaint that has already been dealt with and for which a final decision has been made on the merits.
- The complaint must be about facts that occurred less than a year ago:
 - If the complaint concerns a one-off event, it is admissible if it was lodged during a period of one year after the fact
 - If the complaint concerns a series of related facts, the above period shall be calculated from the time when the last event occurred.
- The complaint may be about a Data Privacy Problem (GDPR)

If the complaint does not qualify for further processing, the interested party shall be informed in writing of this reasoned decision and the complaint procedure shall be closed, unless the interested party submits the same complaint before the expiry of the limitation period of 1 year which does meet the conditions for further treatment.

5. How is a properly submitted formal complaint handled?

The complaint is entered in a register within seven days of receipt, and a copy is sent to the compliance officer and the Board of Directors or the Compartment Committee. The compliance officer investigates the complaint. If the complaint concerns GDPR, the data protection officer (DPO) will also be informed.

First, the compliance officer or DPO will examine whether the complaint can be considered, based on the criteria mentioned above. If the complaint must be taken into account, the interested party will be informed by a letter stating the next steps and the calendar provided for the handling of complaints. If the complaint cannot be processed, the justification for the decision will be communicated in a letter.

The compliance officer and/or the DPO then investigates the basis of the complaint. He may request additional information from the person concerned. If the interested party so requests, the compliance officer and/or the DPO will give the interested party the opportunity to explain

his position, in the manner, place and time determined by the compliance officer and/or the DPO.

The compliance officer and/or the DPO will take his position within a reasonable period. That period shall not exceed two months and shall start from the date of the written confirmation of the admissibility of the complaint. The compliance officer and/or DPO communicates his position together with a justification to the Board of Directors or the Compartment Committee. The Board of Directors/Compartment Committee will decide within a period of one month on the follow-up that will be given to the complaint. The reasoned decision shall be communicated to the interested party without delay, and a copy shall be provided to the compliance officer and/or the DPO. The decision is entered in the complaints register.

6. The possible follow-up

If the interested party does not agree with the pension fund's position, he can address a registered letter to the chairman of the Board of Directors. For the complaint to be dealt with again, new arguments and/or elements must be put forward.

The Board of Directors examines the new arguments within a reasonable period, together with the compliance officer and/or the DPO. The Board shall communicate its reasoned decision to the interested party. He also provides a copy to the compliance officer and/or the DPO and to the UPP Daily Management team. The new decision will be entered in the complaints register.

If the interested party cannot agree with the result of the complaints procedure, he or she can contact either the Belgian or local country supervisory authorities. The authority to be contacted depends on the nature of the complaint as per the table below.

Authority name and contact details	Reason for contact
FSMA (Belgium regulator) Congresstraat 12 - 14 1000 BRUSSELS Phone 02 220 52 11 Fax 02 220 58 19 Email: pva.pp@fsma.be www.fsma.be	Belgian pension, social and labour laws. Any matter not related to local country pension, social and labour laws
Irish Financial Services and Pensions Ombudsman The Office of the Pensions Ombudsman 36 Upper Mount Street Dublin 2 www.pensionsombudsman.ie	Irish pension, social and labour laws.
Geschillen instantie pensioenfondsen (Dutch Pensions Ombudsman) https://geschilleninstantiepensioenfondsen.nl/	Dutch pension, social and labour laws.
Greek pension regulator Hellenic Republic Ministry of Labour and Social Affairs	Greek pension, social and labour laws.

29 Stadiou str., 105 59, Athens Greece https://ypergasias.gov.gr/	
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If the interested party is unsure of which supervisory body to contact, they can contact the UPP Daily Management team.

If the interested party does not agree with the DPO's opinion regarding a GDPR complaint, the data subject can submit a complaint to:

Data Protection Authority
Drukpersstraat 35
1000 BRUSSELS

If the interested party cannot agree with the result of the complaints procedure, he or she can also apply to the competent court.

7. Contact person for the handling of complaints and for contacts with the supervisory authority

The Board has appointed the Daily Management team as the contact persons for submitting complaints. The complaints will be followed up by the compliance officer and/or the DPO.

The Board has appointed the Daily Management team as the contact persons for the supervisory authority. This contact persons are charged, among other things, with keeping a copy of all written contacts with the supervisory authority.

**Approved by Unilever Pension Plan Board of Directors
Date 13 February 2025**

This policy has been sent to the appropriate contacts to ensure that they are aware of their obligations.

Version Control

Date	Version	Author	Update
21 Sept 2023	1.0	Daily Management	Initial version after relocation
12 Sept 2024	2.0	Daily Management	Updated to reflect local country regulators
13 Feb 2025	3.0	Daily Management	Updated to reflect UPP resource changes