



**FLORIDA ANTITRUST ACT
CIVIL INVESTIGATIVE DEMAND**

Unilever

Demand No. 26-030

**TO: Unilever United States, Inc.
C/O C T CORPORATION SYSTEM
1200 SOUTH PINE ISLAND ROAD
PLANTATION, FL 33324**

**(Or Such Other Address as
Service Can be Made)**

THIS CIVIL INVESTIGATIVE DEMAND is issued under Section 542.28(1), *Florida Statutes*, in the course and authority of an official investigation to determine whether there is, has been, or may be a violation of Chapter 542, *Florida Statutes*, the Florida Antitrust Act of 1980, by conduct or activities of the following nature:

**Agreements that unreasonably restrain trade and result in increased costs,
reduced output and reduced quality of goods and services.**

YOU ARE HEREBY COMMANDED to produce the documents described in Attachment A of this CIVIL INVESTIGATIVE DEMAND. You are required to search for and produce all materials in accordance with the definitions and instructions contained therein. You are required to produce the documents described to Assistant Attorney General Steven Orban or his designee at or before 5:00 PM, May 26, 2026.

You must attest to your compliance in the form printed on the reverse side of this document, which shall be executed by the person to whom this document is directed, or, if not directed to a natural person, by a person having knowledge of the facts and circumstances relating thereto.

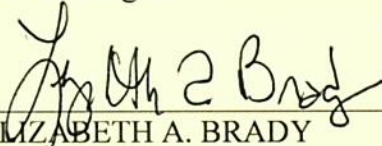
Please note Section 542.28(1), *Florida Statutes*, and Section 837.02, *Florida Statutes*, printed on the reverse side of this document.

Issued at Tallahassee, Florida, this 21st day of April 2026.

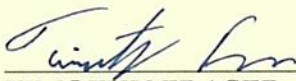
**JAMES UTHMEIER
ATTORNEY GENERAL**

Countersigned:

By:



ELIZABETH A. BRADY
Director, Antitrust Division



TIMOTHY FRASER
Special Counsel

FORM OF CERTIFICATE OF COMPLIANCE

I have read the provisions of Section 542.28(1), *Florida Statutes*, and do hereby certify that all information required by this CIVIL INVESTIGATIVE DEMAND No. **26-030**, which is in the possession, custody, control or knowledge of the person to whom the CIVIL INVESTIGATIVE DEMAND is directed, has been submitted to Assistant Attorney General Steven Orban.

Signature _____

Title _____

Date _____

Sworn to before me this _____ day of _____ 2026.

Notary Public

542.28 Civil investigative demand.—

- (1) Whenever the Attorney General, or a state attorney with appropriate jurisdiction and with the written consent of the Attorney General, has reason to believe that any person may be in possession, custody, or control of any documentary material, or may have any information, which documentary material or information is relevant to a civil antitrust investigation authorized by s. 542.27(3), the Attorney General or such state attorney may, prior to the institution of a civil or criminal proceeding thereon, issue in writing and cause to be served upon such person a civil investigative demand requiring such person to:
 - (a) Produce such documentary material for inspection and copying or reproduction;
 - (b) Answer, under oath and in writing, written interrogatories;
 - (c) Give sworn oral testimony concerning the documentary material or information; or
 - (d) Furnish any combination of such material, answers, or testimony

837.02 Perjury in official proceedings

- (1) . . . [W]hoever makes a false statement, which he or she does not believe to be true, under oath in an official proceeding in regard to any material matter, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

- (3) Knowledge of the materiality of the statement is not an element of the crime of perjury under subsection (1) . . . and the defendant’s mistaken belief that the statement was not material is not a defense.

If you believe that any part of this CIVIL INVESTIGATIVE DEMAND can be narrowed in any way that is consistent with this Office’s need for information, you are encouraged to discuss possible modifications with:

Steven Orban, Assistant Attorney General
 Antitrust Division
 PL-01, The Capitol
 Tallahassee, FL 32399-1050
 (850) 414-3300

ATTACHMENT A

PRODUCTION OF DOCUMENTS

DEFINITIONS

1. “Agreement(s)” means any oral or written contract, arrangement, or understanding, tacit or express, whether formal or informal, between two or more Persons, together with all modifications or amendments thereto.

2. “Communication(s)” means any exchange, transfer, or dissemination of information, regardless of the means or medium by which it is accomplished.

3. “Document(s)” as used in these requests is defined as data or information in any tangible form, including, but not limited to, the original and any non-identical copy (which is different from the original because of notations on such copies or otherwise) of all correspondence, telegrams, teletype messages, faxes, contracts (including drafts, proposals and any and all exhibits thereto), draft minutes and agendas, memoranda (including white papers, Hart-Scott-Rodino filings and submissions, inter- and intra- office memoranda, memoranda for file, pencil jottings, sticky notes, diary entries, desk calendar entries, reported recollections, and any other written form of notation of events or intentions), transcripts and recordings of conversations and telephone calls, books, records, presentation slides or notes, photographs, reports, tabulations, charts, books of account, ledgers, invoices, financial statements, purchase orders, receipts, canceled checks, computer files, data files, or any communications on any platforms, whether for ephemeral or non-ephemeral messaging, for email, chats, instant messages, text messages, and other methods of group and individual communication (e.g., Microsoft Teams, Slack), and all other documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith, as well as data or Communications stored, maintained or organized electronically or magnetically

through computer equipment. This definition includes Documents in electronic or magnetic form shall be obtained or translated, if necessary, by You into reasonable usable form. The term “Document” shall also include audio and/or video recordings.

4. “Each,” “any,” and “all” mean “each and every.” “Each” includes “every,” and vice versa.

5. “Identify,” when used with respect to a person or entity, means information sufficient to allow employees of the Attorney General to determine the current contact information (name, home or business address, telephone number, email), and if not a natural person, the current contact information for Your point of contact with the entity or facility to be identified, as well as the relationship of that person or entity to You.

6. “Identify,” when used with respect to a meeting, conference, conference call, or videoconference, means to state with specificity (1) the date and time of the event; (2) the location of the event; (3) the medium of communication (*e.g.*, in-person meeting; telephone; videoconference; etc.); (4) all of Your personnel who attended or participated in the event; and (5) all other individuals and entities that attended or participated in the event.

7. “Identify,” when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to determine the fact or event with reasonable particularity, and to identify each person believed to have knowledge about the fact or event and each document that refers or relates to the fact or event.

8. “Identify,” with regard to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the name(s) and alias(es) of the person(s) who made the Communication; and the name(s) and alias(es) of all persons who were present when the statement was made, who received the Communication,

who heard the Communication, or who came to know of the content of the Communication at a later time.

9. “Including” means including but not limited to.

10. “Person” means any natural person; public or private corporation, whether or not organized for profit; governmental entity; partnership; association; cooperative; joint venture; sole proprietorship; or other legal entity. With respect to a business entity, “Person” includes any natural person acting formally or informally as an employee, officer, agent, attorney, or other representative of the business entity.

11. A Person is a “party to” a Communication if that Person was the sender, speaker, or disseminator of the Communication; the person was a recipient (including via “cc” or “bcc”) or hearer of the Communication; or the Communication was otherwise disseminated to or received by the person.

12. “Problematic Materials Statement” means the “position statement” regarding “problematic materials” issued by the Sustainable Packaging Coalition, as well as all prior iterations of that position statement and all other lists developed or distributed by the Sustainable Packaging Coalition for the purpose of identifying materials considered to be problematic or unnecessary.

13. “Problematic and Unnecessary Materials List” means the U.S. Plastics Pact’s Problematic and Unnecessary Materials List, as well as all prior iterations of the Problematic and Unnecessary Materials List and all other lists developed or distributed by the U.S. Plastics Pact for the purpose of identifying materials considered to be problematic or unnecessary.

14. “Relating” or “Relating to” means constituting, concerning, embodying, reflecting, identifying, regarding, describing, referring to, evidencing, discussing, connected with, bearing

on, pertaining to, involved with, revealing, having to do with, or in any way relevant to a given subject.

15. “Relevant Period” - Unless otherwise indicated, You must produce all responsive Documents for the time period of August 1, 2020 to the date of the production of all Documents by You in response to this Civil Investigative Demand (“Relevant Period”). If a Document relates to the Relevant Period, it must be produced, regardless of when it came into being.

16. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request all responses that might otherwise be construed to be outside of its scope.

17. The use of the singular form of any word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.

18. “You,” “Your Company,” and “Your” refer to Unilever United States, Inc., its parent corporation, predecessors, successors, divisions, subsidiaries, related corporations, special purpose vehicles, departments, affiliates, and its present and former owners, officers, directors, employees, agents, representatives, and any other persons acting, or purporting to act on its behalf, including, but not limited to, the person to whom this request is addressed, in his/her individual capacity and as an officer and agent of Unilever United States, Inc.

INSTRUCTIONS

1. This Civil Investigative Demand calls for the production of all responsive Documents in Your possession, custody, or control without regard to the physical location of said Documents.

2. If You do not possess any Documents responsive to a request, state this fact and specify the paragraph of this request to which it is responsive.

3. If You withhold any Documents based on a claim of privilege, provide a statement of the claim of privilege and all facts on which You rely in support of Your claim, including (a) author(s), (b) recipient(s), (c) date(s), (d) title(s), (e) subject matter(s) and (f) location(s) of the Document, and (g) the paragraph(s) of this Demand to which it is responsive. If You withhold any Documents based on a claim that they constitute or contain attorney work product, provide the information called for by (a)-(g) above and identify the litigation in connection with which the Document was prepared.

4. If the person to whom the attached Civil Investigative Demand is directed believes that any part of the Demand can be narrowed in any way that is consistent with this Office's needs, you are encouraged to discuss such questions and possible modifications with the representative of this Office identified in the Demand as the one to whom inquiries concerning compliance should be directed. All modifications to the attached Demand must be agreed to in writing by said representative.

5. The response to this request should be submitted in the following manner:

- a. Provide a cover letter with each production that identifies the volume(s) and includes the Bates range for the documents produced in each volume.
- b. Produce Microsoft Excel and other spreadsheet files (including delimited

text files), Microsoft Access files, and audio/video files in Native Format. Before producing data from structured data sources, consult with the representative of this Office identified herein as the one to whom inquiries concerning compliance should be directed on acceptable formats for the production of such data.

c. Produce all other documents as single page Group IV TIFF black and white files (one file per page) with an image resolution of 300 DPI. OCR files must be provided in a separate \TEXT\ directory containing Document level text files. If Foreign Language/Unicode text exists, TEXT files should be in appropriate UTF-8 or UTF-16 format.

d. Each production containing electronically stored information (ESI) must be accompanied by two Load/Unitization files.

e. The first load file must be a metadata import file in Concordance format with a .dat file extension that contains all metadata fields listed in Table 1, below, to the extent applicable.

f. The first load file must use standard Concordance delimiters:

- i. Comma - ¶ (ASCII 20);
- ii. Quote - ¢ (ASCII 254);
- iii. Newline - ® (ASCII 174).

g. The second load file must be a cross-reference file that contains the corresponding image information identifying the document breaks. The acceptable formats for the cross-reference files are .log and .opt.

h. All attachments and embedded files must sequentially follow the parent document.

TABLE 1

Field Name	Description
BegBates	Beginning Bates Number.
EndBates	Ending Bates Number.
BegAttach	Beginning Bates Number of the first document in a document family range. (Only populated for documents that are part of document families, i.e., containing parents or attachments)
EndAttach	Ending Bates number of the last document in attachment range in a document family range. (Only populated for documents that are part of document families, i.e., containing parents or attachments)
AttachmentCount	Populated for email parent records and indicates the number of attachments that constitute the whole family (BegAttach to EndAttach).
Custodian	Name of the custodian of the document.
FileName	Filename of the original source ESI
EmailSubject	Subject line extracted from an email
Importance	Email importance flag
Title	Title field extracted from the metadata of non-email ESI
Author	Author field extracted from the metadata of non-email ESI
From	From or Sender field extracted from an email
To	To or Recipient field extracted from an email
CC	CC or Carbon Copy field extracted from an email
BCC	BCC or Blind Carbon Copy field extracted from an Email.
DateSent	Sent date of an Email (mm/dd/yyyy format).
TimeSent	Time of an Email (hh:mm:ss format).
DateReceived	Received date of an Email (mm/dd/yyyy format).
TimeReceived	Received time of an Email (hh:mm:ss format).
DateCreated	Creation date of a file (mm/dd/yyyy format).
TimeCreated	Creation time of a file (hh:mm:ss format).
DateLastModified	Last modification date (mm/dd/yyyy format).
TimeLastModified	Last modification time (hh:mm:ss format).
File Extension	File extension of Document (.msg, .doc, .xls, etc.)
Full Text	File path to full text/OCR File.
Confidentiality	Confidentiality level requested by producing party.
Message-ID	The Outlook Message ID assigned by the Outlook mail server, if applicable.
ConversationIndex	Unique alphanumeric identifier for an email conversation, which may be populated by the e-mail client for each outgoing message, if applicable.
PageCount	Number of pages in the file.
FileSize	Size of the file in bytes.
Application	Indicates software application that generated the ESI item (e.g., Outlook, Word)
Production Volume	Production volume name or number
SourceParty	The Producing Party.

REQUESTS FOR PRODUCTION

You are required to produce the documents described to Assistant Attorney General Steven Orban or his designee on or before 5:00 PM, May 26, 2026, at the following location:

OFFICE OF THE ATTORNEY GENERAL
107 WEST GAINES STREET
TALLAHASSEE, FL 32301

Your production must include an executed copy of the Certificate of Compliance located on the reverse side of the first page of this document.

You are commanded to produce the following documents or material:

1. For every meeting, conference, conference call, and videoconference associated with the U.S. Plastics Pact, the Consumer Goods Forum, or the Sustainable Packaging Coalition that any of Your personnel attended, produce all invitations, agendas, handouts, slide decks, attendee notes, and meeting minutes associated with the event.

2. All Communications to which the Sustainable Packaging Coalition or the U.S. Plastics Pact was a party Relating to the Problematic Materials Statement or the Problematic and Unnecessary Materials List, Including Communications regarding the development of either of those documents or steps to eliminate or reduce the use of materials identified in either of those documents.

3. Documents Relating to all steps that You have taken to eliminate or reduce the use of any materials identified in the Problematic Materials Statement or the Problematic and Unnecessary Materials List during the Relevant Time Period, and all Documents Relating to any actual or projected increases in consumer price, decreases in output, decreases in innovation, and/or decreases in consumer choice resulting directly or indirectly from those steps.

4. All Communications to which the U.S. Plastics Pact was a party Relating to the U.S. Plastics Pact's Design for Recyclability Playbook, Design for Reuse Playbook, or Design

for Compostability Playbook, as found on the U.S. Plastics Pact website at

<https://usplasticspact.org/design-for-circularity-playbooks/>.

5. Documents that show all steps that You have taken to implement any aspect of the U.S. Plastics Pact’s Design for Recyclability Playbook, Design for Reuse Playbook, or Design for Compostability Playbook.

6. All Agreements between You and the U.S. Plastics Pact.

7. All Agreements between You and the Sustainable Packaging Coalition and/or Green Blue Institute.

8. All Communications to which the Sustainable Packaging Coalition was a party Relating to the Sustainable Packaging Coalition’s *Guide to Recycled Plastics for Packaging*, as found on the Sustainable Packaging Coalition’s website at <https://sustainablepackaging.org/2025/03/06/guide-recycled-plastic-packaging/>.

9. All Communications to which the Sustainable Packaging Coalition was a party Relating to the Sustainable Packaging Coalition’s *Materials Decision Matrix*, as found on the Sustainable Packaging Coalition’s website at <https://sustainablepackaging.org/materials-matrix/>.

10. Documents Relating to all steps that You have taken to implement any aspect of the Sustainable Packaging Coalition’s *Guide to Recycled Plastics for Packaging* or the Sustainable Packaging Coalition’s *Materials Decision Matrix*, and all Documents Relating to any actual or projected increases in consumer price, decreases in output, decreases in innovation, and/or decreases in consumer choice resulting directly or indirectly from those steps.

11. Documents that show all actions You have taken Relating to the development of any shared technical standards, guidance, position papers, and frameworks (together “resources”) promulgated by the U.S. Plastics Pact, Including draft versions.

12. For each resource You contributed to that was identified in response to RFP 11, above, produce all Communications with any other “Activators,” “Activator Accelerators,” as found on the U.S. Plastics Pact website at <https://usplasticspact.org/about/activators-of-the-u-s-plastics-pact/>, and/or the U.S. Plastics Pact Relating to their development.

13. All Documents and Communications Relating to the U.S. Plastics Pact antitrust policy.

14. All Documents and Communications Relating to the Sustainable Packaging Coalition antitrust policy.

15. All internal analyses done by You based, in whole or in part, on information, technical standards, position papers, guidance, frameworks, or progress reports provided by U.S. Plastics Pact to You.

16. Your Antitrust compliance policy and materials and all Communications relating to them.

17. All document retention policies, Including Your electronic retention policies Relating to electronic media Including email, Slack messages, and Microsoft Teams chats.

18. All Documents and Communications Relating to the October 29, 2025 letters sent by the Florida Office of the Attorney General to the U.S. Plastics Pact, Consumer Goods Forum, and the Green Blue Institute, and the February 10, 2026 letter sent by the Florida Office of the Attorney General to You, Including all Communications with Crystal Bayliss at cbayliss@usplasticspact.org and Paul Nowak at paul.nowak@greenblue.org.

19. All Documents and Communications in which representatives of the U.S. Plastics Pact, Consumer Goods Forum, and/or the Sustainable Packaging Coalition made statements or representations Relating to the impacts, Including any actual or projected increases in consumer

price, decreases in output, decreases in innovation, and/or decreases in consumer choice, of their respective targets, goals, benefits, or any other objectives to You. This request includes, for example, marketing or promotional materials; white papers and/or research relied on; any internal Communications discussing the accuracy or viability of their goals, benefits, or other objectives; and any disclaimers or clarifications made to You relating to the targets, goals, benefits, and/or objectives of the U.S. Plastics Pact, Consumer Goods Forum, and/or Sustainable Packaging Coalition.