

Shift

Putting Principles into Practice



Business and Human Rights Impacts: Identifying and Prioritizing Human Rights Risks

Workshop Report, 15 & 16 January 2014
Social and Economic Council (SER)
The Hague, The Netherlands

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Shift

Shift is an independent, non-profit center for business and human rights practice. It is staffed by a team that was centrally involved in shaping and writing the UN Guiding Principles on Business and Human Rights, and is chaired by the author of the Guiding Principles, Professor John Ruggie.

Shift provides the expert knowledge and guidance for businesses and governments to put the UN Guiding Principles into practice. Based on lessons from this work, Shift develops public guidance materials to support improved practices for the respect and protection of human rights globally.

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EXECUTIVE SUMMARY

I. Background

This report summarizes the key lessons learned from a workshop facilitated by Shift on identifying and prioritizing human rights risks. The workshop was convened by the Dutch Social and Economic Council of the Netherlands (SER) on 15 and 16 January 2014, in The Hague, the Netherlands. The workshop involved over 20 representatives from 12 participating companies, as well as 12 expert stakeholders, including from trade unions, NGOs and other non-profit organizations.

The objectives of the workshop were to:

- 1) build practical experience in applying key tools and approaches for identifying, appropriately prioritizing and taking action on human rights risks;
- 2) generate broader learning about implementing these approaches to share with a wider audience in order to contribute to evolving understandings of how to put business respect for human rights into practice.

The workshop focused on the first two steps of human rights due diligence as they are elaborated in the UN Guiding Principles on Business and Human Rights, and incorporated in the OECD Guidelines for Multinational Enterprises – assessing impacts and integrating and taking action on identified impacts. It drew on existing methodologies developed by Shift through its work on putting the Guiding Principles into practice.

In advance of the workshop, participating companies were asked to prepare an initial identification of human rights risks related to their operations. In addition, three pilot companies applied the relevant methodologies in more depth, with support from Shift. During the workshop, participants engaged in table discussions (with 3 companies and 2-3 expert stakeholders at each table) about the methodologies for identifying, appropriately prioritizing, and taking action on human rights risks. The companies shared their own efforts and received feedback from the other participants. The role of the expert stakeholders was two-fold: to provide sector-specific knowledge about human rights risks in a particular commodity and/or country, and to help stimulate critical thinking by company participants. Each session ended with a plenary discussion about key learnings, as well as common pitfalls and challenges experienced by companies, which are summarized in the body of this report. The workshop was held under the Chatham House Rule.

II. Identifying Actual and Potential Impacts

Identifying human rights impacts is the first step in human rights due diligence: in order to effectively prevent and address impacts, a company first needs to know what its actual and potential impacts are. This involves identifying relevant activities of the company or a business partner in the value chain; stakeholders that could be affected by those activities; and specific human rights impacts that could result.

Learnings from the workshop included:

- Choosing a specific entry point (eg. a critical business relationship, supply chain input, product line, function, or operating context) can help focus attention and also gain traction internally; but this is not a substitute for considering all parts of the business when assessing a company's human rights risks.
- It is important to take an approach that makes sense for the business, for example by distinguishing between different geographies when mapping relevant activities and stakeholders.
- Adopting a systematic approach proved valuable in helping identify potential impacts that companies had otherwise not thought of.
- Company participants found that the interaction with expert stakeholders was crucial in helping them identify relevant risks – both complementing and testing their own approaches.

III. Appropriately Prioritizing Impacts

Understanding the severity of a company's actual and potential impacts is particularly important in situations where a company cannot address all identified impacts at the same time. This can help ensure that its efforts are appropriately focused on those impacts where the risk to individuals' human rights is greatest (as defined by the scale, scope and irremediability of impacts). Companies will also need to understand the likelihood of a potential impact occurring, through an analysis of the country context and specific business relationships involved.

Learnings from the workshop included:

- In order to assess severity and likelihood, impacts need to be placed in context, because they are specific to each country and set of business relationships.
- Sometimes companies may need to make "educated guesses" early on in the process in order to prioritize certain parts of the value chain for closer attention; however, testing these guesses with expert stakeholders will be key.
- Often (internal or external) risk mitigation strategies for a particular impact may already be in place, and these should be taken into account when assessing likelihood and severity.
- Risk management is often primarily an internal exercise for companies; however, when prioritizing human rights impacts, stakeholder engagement is critical in order for companies to take full account of the perspectives of affected stakeholders. Expert stakeholders can be important proxies in this regard.

IV. Integrating and Acting on Identified Risks

Once companies have identified and appropriately prioritized impacts for attention, the Guiding Principles make clear that they need to take action to prevent, mitigate, and/or remediate the identified impacts. The type of action a company is expected to take will depend on how it is involved with the impact - that is, whether it caused, contributed or is linked to the impact – but leverage will often play a key role. (For reasons of time, the workshop focused on prevention and mitigation of risks, rather than remediation of actual impacts.)

Learnings from the workshop included:

- Understanding the nature of business relationships in the value chain (eg, by mapping them) can help the company understand what leverage it has with the different entities involved.
- Using and building leverage requires creativity because it is highly contextual. Leverage does not require a contractual or other direct relationship; simply having a conversation can create its own leverage.
- Building internal leverage – for example, with colleagues in operations or senior management – can be as critical as creating external leverage.
- Taking action alone is typically harder – effective action requires collaboration both with internal stakeholders and external stakeholders, who can provide expert knowledge and enhance creative thinking.

V. Conclusion

Especially for companies relatively new to the concept, conducting human rights due diligence may at first feel overwhelming and complex. However, workshop participants overwhelmingly agreed that going through the steps systematically, engaging in cross-functional conversations with colleagues, and engaging with expert stakeholders on specific human rights challenges and approaches are all essential to robust human rights due diligence. Based on their experience, participants identified some key points of advice for companies not at the workshop, summarized on page 24 of the report. As one put it, perhaps the most important lesson is: “Just get started.”

I. Background

There is an increasing expectation that companies will identify, prevent and address adverse impacts on human rights related to their business operations and activities. The OECD Guidelines for Multinational Enterprises (“OECD Guidelines”) and the UN Guiding Principles on Business and Human Rights

(“UN Guiding Principles”) captured this expectation by expecting companies to conduct ‘Human Rights Due Diligence’ where they are, or risk being, involved with negative human rights impacts. However, many companies struggle with the practical realities of implementation: faced with a broad range of potential impacts, not all of which they are able to immediately address, companies are asking what action they should take. Companies

often focus first on impacts where they have the greatest “leverage” or control, rather than on impacts that are the most severe from the perspective of affected stakeholders.

Recognizing these practical challenges, the Social and Economic Council (SER) of the Netherlands invited Shift, a leading non-profit center of practice on the UN Guiding Principles, to facilitate a workshop with Dutch companies to explore practical approaches to identifying and appropriately prioritizing human rights risks. The workshop brought together business leaders from 12 Dutch companies along with expert external stakeholders to apply key tools and approaches for identifying potential human rights impacts, prioritizing them appropriately where that is necessary, and starting to develop mitigation and remediation strategies to address them. The workshop took place over 1.5 days, from 15-16 January, 2014, in Den Haag, The Netherlands.

Shift is an independent non-profit center for business and human rights. Our team was centrally involved in shaping and writing the UN Guiding Principles on Business and Human Rights. We help governments, businesses and their stakeholders put the UN Guiding Principles into practice.

As an advisory and consultative body of employers' representatives, union representatives and independent experts, the Social and Economic Council of the Netherlands (SER) aims to help create social consensus on national and international socio-economic issues.

The workshop had two clear objectives:

- First, to build practical experience among the participants in applying key tools and approaches for identifying, appropriately prioritizing and taking action on human rights risks, in line with the OECD Guidelines and UN Guiding Principles;
- Second, to generate broader learning about implementing these approaches to share with a wider audience (through this report) in order to contribute to evolving understandings of how to implement business respect for human rights in practice.

In advance of the workshop, on November 14, 2013, SER and Shift facilitated an introductory session for participants on the UN Guiding Principles’ expectations with regard to the identification and appropriate prioritization of human rights risks. Participating companies were then asked to prepare for the workshop by

beginning to identify potential human rights risks related to their activities and business relationships. In addition, three companies were selected (based on size, level of experience and key human rights issues) as ‘pilots’; they applied the tools in more depth in advance of the workshop (supported by Shift) in order to deepen the discussion on the day.

Critical to the workshop’s success was the involvement of a number of expert stakeholders, including from trade unions, NGOs, and other non-profit organizations. Their role was two-fold: to provide sector-specific knowledge about human rights risks in a particular commodity and/or country, and to help stimulate critical thinking by company participants. *The full list of participants can be found in Annex 6.*

Participating Company	Sector
ABN AMRO	Financial
AkzoNobel	Chemical
Dadtco	Agriculture
Geolog	Oil & Gas
H2OnSite	Water technology
Heineken	Beverages
KLM	Air Transport
Nidera	Agriculture/ trading
Nuon	Energy
Nutreco	Food
Triodos	Financial
VimpelCom	Telecom

Participating expert stakeholder organizations:

- **Amnesty International Netherlands**
- **Cordaid**
- **FMO (Dutch DFI)**
- **FNV (Dutch labor union)**
- **Human Rights @ Work**
- **Oxfam Novib**
- **SOMO/OECD Watch**
- **VBDO**

During the workshop, participating companies were guided through a step-by-step approach to identifying and prioritizing human rights risks. Together with the expert stakeholders, companies engaged in small-group discussions intended to broaden and challenge their initial thinking. The workshop was not intended to simulate a robust due diligence exercise, but rather to introduce key tools and approaches, apply them to particular focal areas chosen by the participating companies, and equip business leaders with the ability to take these approaches back to their companies to support and deepen their existing human rights due diligence processes.

The workshop was held under the Chatham House rule, meaning that the content of the discussions could be shared externally, but no comments would be attributed to or identifiable to specific individuals or organizations.

This report summarizes the main points of discussion in the workshop. The examples provided in the Annexes are provided with the consent of the participating companies. SER and Shift are grateful to all participants in the workshop for sharing their experiences and challenges in an open and constructive manner. Special thanks is due to the pilot companies for their particular engagement.

II. Introduction to Identifying and Prioritizing Human Rights Risks

A. What are companies expected to do?

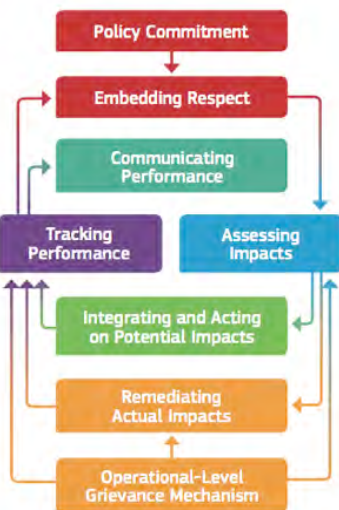
The UN Guiding Principles outline the corporate responsibility to respect, which means to avoid infringing on the rights of others and address adverse impacts with which a company may be involved. This concept also underpins the revised OECD Guidelines.

Internationally recognized human rights are, at a minimum, those listed in the International Bill of Human Rights (including the Universal Declaration on Human Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (based on the ILO Core Conventions).

The responsibility to respect applies to all internationally recognized human rights (see box), and extends to actual and potential impacts that a company may cause, contribute to, or that may be directly linked to its operations, products or services through a business relationship. The UN Guiding Principles make clear that company efforts to prevent and address impacts should take full account of the severity (meaning the scale, scope and irremediability) of those impacts from the perspective of affected stakeholders. Respect for human rights is about a company's core operations; it is not possible to "offset" human rights harms in one area through philanthropic contributions in another.

In order to meet their responsibility to respect, companies are expected to have three core elements in place:

1. A **policy commitment** that supports embedding respect for human rights throughout the company;
2. **Human rights due diligence** processes, consisting of processes for:
 - a. Assessing impacts,
 - b. Integrating and acting on identified impacts,
 - c. Tracking performance, and
 - d. Communicating on performance, and
3. **Remediation** processes for situations where the company identifies that it has caused or contributed to a human rights impact, which includes the role of operational-level grievance mechanisms.



The diagram on this page illustrates the connections between these core elements.¹

The workshop focused on the first two elements of human rights due diligence – Assessing impacts and Integrating and Acting. SER's activities and discussions with companies and other stakeholders had highlighted that many companies are struggling with understanding "where to start" when it comes to implementing human rights due diligence. Specifically, companies are seeking guidance on how to appropriately prioritize identified risks where resources may be limited in order to focus on specific actions they can take to address the most severe human rights impacts with which they may be involved.

¹ European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, p. 15. (See Annex 5 for links to publication).

B. Why should companies conduct human rights due diligence?

The workshop began with a discussion among participants of some of the main reasons why conducting human rights due diligence is critical for business – beyond the fact that it is expected by the UN Guiding Principles and OECD Guidelines. These included:

- **It is the right thing to do:** ensuring respect for human rights is how the company wants to do business, it aligns with company values and “who we are.”
- **It helps run the business:** human rights due diligence can help companies make informed business decisions, determine where to focus, and identify business opportunities.
- **Risk management:** Boards of publicly listed companies have particular duties with regarding to protecting the interests of shareholders – and increasingly, other stakeholders – and due diligence helps protect value, including intangible assets such as the company’s reputation, and avoid costs related to conflicts with workers and communities.
- **Social license to operate:** in practice, companies increasingly find that having a legal license to operate alone may not be enough, and that a “social license to operate” (from local communities or other stakeholders) is necessary to carry out their activities without opposition or interruption.
- **Compliance with internal policies:** many companies have formal policies (such as Supplier Codes of Conduct) with provisions on human rights. Human rights due diligence can help ensure compliance with existing policies.
- **Building sustainable relationships with key stakeholders:** human rights due diligence can help companies meaningfully engage with their key stakeholders about their efforts to prevent and address human rights risks. It can also help build sustainable relationships with suppliers and other business partners, as well as increase employees’ confidence and motivation.

C. What is different about human rights due diligence?

The UN Guiding Principles do not prescribe a “one-size-fits-all” approach to conducting human rights due diligence. Companies may develop stand-alone systems or they may integrate human rights into existing systems. Participants noted that the different steps of due diligence resemble or align with many existing company systems, including risk management systems, the Demming cycle (“Plan-Do-Check-Act” or similar), and management standards for key topics such as health and safety or environment. Where they choose to integrate human rights, workshop participants discussed key considerations when applying a “human rights lens” to existing processes (see box below).

Applying a “human rights lens” includes:

- *Focusing on **risks to the human rights of stakeholders** and not (just) risks to the business (eg. reputational, financial or legal risks).*
- ***Looking across the value chain** to include not just the company’s own activities but also the full range of business relationships.*
- *Engaging in a **cross-functional conversation** can be particularly important in large companies in order to avoid “silo”-ing of key departments.*
- ***Engaging with affected stakeholders**, including when identifying and prioritizing human rights risks.*
- *Understanding that human rights due diligence should be **ongoing, broad and systematic**, and able to respond to changing circumstances.*

III. Identifying Actual and Potential Impacts

Identifying human rights impacts is the first step in human rights due diligence: in order to effectively prevent and address impacts, a company first needs to know what its actual and potential impacts are.

A. Key Considerations

When companies seek to identify their impacts, it can be particularly helpful to do so by considering both the company’s own operations and the range of stakeholder groups that may be impacted.²

Activities is broadly understood to include actions by the company or a business partner in the value chain that may lead to an adverse human rights impact on an individual. These can range from raw materials sourcing to hiring and from sales and marketing to lobbying.

² See further the European Commission’s Sectoral Guides (links in Annex 5).

Affected stakeholder groups can range from a company’s own employees and contract workers to local community members, smallholders selling to suppliers, customers and end-users. The Guiding Principles highlight in particular the need to identify potentially vulnerable individuals and groups (see box).

Mapping activities and stakeholder groups can help companies be precise about specific impacts involved – and the human rights that may be affected. For an example of one company’s mapping of relevant activities and stakeholder groups, see Annex 1.

The publication **Human Rights Translated** is an excellent resource for companies seeking to understand how they may be involved with impacts on internationally-recognized human rights (reference in Annex 5).

What is an “impact”?

An ‘adverse human rights impact’ occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights.

Vulnerable individuals or groups often face a higher risk of being exposed to adverse impacts and may need particular attention in impact identification processes. Examples can include children, women, indigenous peoples, ethnic or other minorities, migrant workers, or persons with disabilities.

The table below gives some examples of potential impacts (examples are from the ICT industry but many apply to other sectors) and the relevant human rights that may be affected.

Example of an impact	Human rights affected
• Child labor used in extracting of minerals and/or informal recycling of e-waste	Children’s rights, including Right to Be Free from Child labor
• Supplier factory workers lack adequate protective equipment and training leading to significant negative impacts on their health	Right to Highest Attainable Standard of Health
• Factory releases toxic fumes that are not adequately treated or pollutes water sources that local community relies on leading to significant negative impacts on local communities’ health and livelihoods.	Right to Highest Attainable Standard of Health; Right to an Adequate Standard of Living
• Workers are denied the opportunity to join a legitimate trade union	Right to Form and Join a Trade Union

B. Key learnings from the workshop

Focusing can help generate internal attention, but is not a substitute for looking across the business

A number of companies found that choosing an entry point – a critical business relationship, supply chain input, product line, function, or operating context – could help focus attention on the exercise and also gain traction internally. For example, one pilot company had chosen to focus on the value chain of a key mineral, because it is a market leader in that sector and a significant portion of its customer base is in that value chain. Another was on the verge of engaging with its first major joint venture partner in an African country, involving the launch of a new product.

However, participants emphasized that all parts of the business need to be considered when assessing a company's human rights risks. If a company needs, or finds it helpful, to focus on a specific area for initial attention, it may be helpful to test this with expert stakeholders to ensure that it is addressing relevant risks.

Mapping business relationships

It is important to take an approach that makes sense for the business. Several companies found it necessary to make a geographical distinction in the mapping of activities, stakeholders and impacts, because the nature of the relationships and activities was very different in each case. One company's procurement function, for example, buys prepared food through locally-based suppliers throughout the world, while beverages and hardware are procured centrally.

Some companies found it helpful to map business relationships involved in particular business units and/or country operations (including suppliers, customers, distributors, retailers etc). For one company example, see Annex 2.

There is value in the process alone

Initially, some companies were concerned that the process of identifying impacts would be overly rigid. However, by the end, participants observed that taking a systematic approach was valuable in helping them identify potential impacts that they had otherwise not thought of – such as risks that may arise from failing to remove an installation in a local community at the end of its life cycle, or moving from a focus on impacts related to customers to appreciate that risks further down the supply chain may pose equally or more severe human rights risks.

In the case of one company that had recently undertaken an extensive “CSR materiality” analysis and questioned whether a human rights impacts identification process would lead to different results, participants pointed out that the inputs for a typical CSR process focus on risk to the business rather than focusing on risks to stakeholders.

Stakeholder engagement is crucial for complementing and testing approaches

Company participants commented that the interaction with expert stakeholders – or as they came to be called during the workshop, “critical friends” – was extremely valuable in identifying relevant risks. The stakeholders' specific knowledge of human rights risks in particular supply chains, country contexts or sectors, helped company participants identify new and diverse impacts, and made the process more robust and therefore credible. Company participants were relieved to see that expert stakeholders did not always have all the answers either, and that together they could in fact achieve more than either could alone.

“If you really want to know what is going on, ask the ‘enemy;’ engaging with those that are most critical of our company, is what we have learned from the most.”
-Company participant

Identifying actual and potential impacts: Common pitfalls and challenges identified by workshop participants

- **Being too rigid about following the steps:** *When assessing impacts, one does not always have to start with identifying the activities. Sometimes it can be more helpful to start with identifying stakeholders or impacts and then work backwards to identify the other elements, as long as all three of activities, stakeholder and impact are identified.*
- **Jumping too quickly to prioritization and taking action:** *Some level of discipline is needed to focus on identifying impacts, and not be “tempted” to move too quickly to prioritization and taking action as it risks missing relevant potential impacts and may limit the company’s ability to be creative. For example, one activity commonly missed in mapping risks is transportation, which often involves high risks of accidents and loss of life.*
- **Mapping “issues” or mapping rights instead of impacts:** *It is critical to define the activity that relates to the impact, and which stakeholder group(s) may be impacted. Simply stating “freedom of expression” as an impact does not define whose freedom of expression is potentially affected (eg. a political dissident) and what activity (eg. blocking access to the network or an online service) is involved.*
- **Focusing too much on the known risks:** *Companies tended to consider and discuss impacts already on their radar rather than making efforts to learn about new impacts, which may lead to blind spots in their analysis. Involving external stakeholders can be critical in this regard.*
- **Limitations on sources of information:** *Many companies based their research on internet searches. While this can generate valuable information, it is essential to supplement this from additional sources with first-hand knowledge or insight, such as members of NGO networks or industry organizations, as well as sources of information within the company.*
- **Making “educated guesses” and working iteratively:** *Companies need to look across their value chain for impacts but this can initially seem overwhelming, particularly for large companies with multiple business lines, countries of operations, and large numbers of suppliers. Choosing a focus to learn and build the internal capacity and necessary buy in from senior management and others in the business can be helpful, as can repeating the exercise for other parts of the company. Where companies need to make “educated guesses” about where risks exist based on limited information, it can be important to test these assumptions with internal and external stakeholders.*

IV. Appropriately Prioritizing Impacts

Understanding the severity of a company's actual and potential impacts is particularly important in situations where a company cannot address all identified impacts at the same time. This can help ensure that its efforts are appropriately focused on those impacts where the risk to individuals' human rights is greatest.

As Guiding Principle 24 indicates: "Where it is necessary to prioritize actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable". As the Commentary to that Principle makes clear, businesses should of course address *all* their negative impacts; but where it is not possible to address them simultaneously, then the Guiding Principles offer a principled way for companies to prioritize.

A. Key Considerations

In order to appropriately prioritize impacts for attention, where that is necessary, companies will need to understand both the likelihood and the severity of the impact.

Likelihood means asking about the presence of factors—external to the company—that can increase the likelihood that potential impacts may occur or be occurring. This, in turn, depends on two factors:

- a) the **country context** in which the activity potentially causing the impact takes place, and
- b) where the impact is through a business relationship, the **capacity of business partners** or others in the value chain to adequately manage their impacts.

Several factors can make negative impacts more likely in a particular **country context**, such as:

- Existence and enforcement of national laws and regulations;
- Conflicts between national laws and international human rights;
- Social customs and practices;
- Presence of corruption;
- Presence of conflict.

There are a range of reliable, publicly available resources that companies can turn to for information on these issues – for a useful list, see the Sectoral Guides developed by Shift and the Institute for Human Rights and Business for the European Commission (see Annex 5 for links).

The following factors can increase or decrease the likelihood of negative human rights impacts arising through a company's **business relationships**:

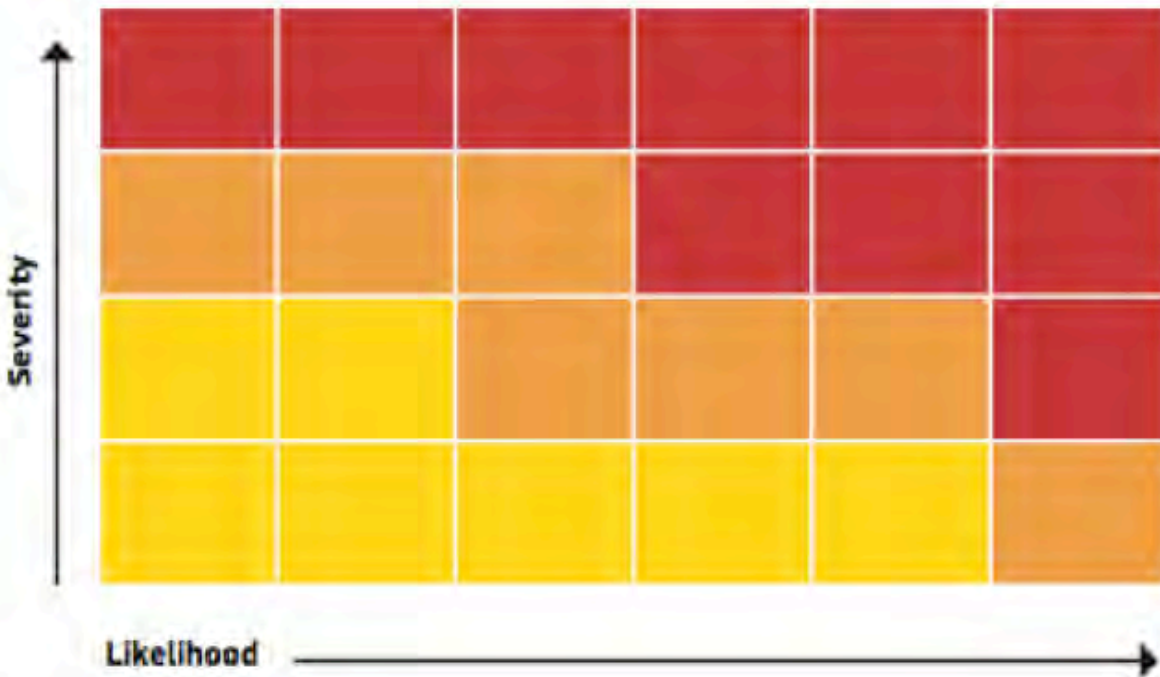
- Whether their policies address respect for human rights;
- Whether they have effective processes for meeting their responsibility to respect;
- Their record for upholding or breaching human rights;
- Their practices with regard to corruption;
- Whether they are in conflict with local stakeholders.

Companies also need to understand the severity of impacts. **Severity** involves asking about the potential harm(s) to stakeholders if an identified impact were to occur, based on its:

- **Scale:** the number of individuals that are or will be affected.
- **Scope:** the gravity of the impact (for example, the risk of loss of life, or forced or child labor).
- **Irremediability:** any limits on the ability to restore those affected to a situation at least the same as, or equivalent to, their situation before the impact (for example, grave impacts on workers' health).

For further guidance on how to understand severity, companies can consult *The Responsibility to Respect: An Interpretive Guide*, issued by the Office of the UN High Commissioner for Human Rights with the approval of Prof Ruggie. See link to publication in Annex 5.

Once the likelihood and severity of an impact has been assessed, it can be “plotted” on a risk matrix like the one below. For an example of one company's effort to do this, see Annex 3.



B. Key learnings from the workshop

Impacts need to be placed in context

Identified impacts need to be placed in a country context because questions related to the existence and enforcement of laws as well as the presence of corruption are highly context-specific. Answers to questions about social customs and practice, and the presence of conflict, can vary significantly even within one country. Similarly, questions about business relationships can generally only be answered for a particular business partner. However, where there are large numbers of similar suppliers, an assessment of likelihood might be made by considering a ‘typical’ business relationship. For example, the absence of fire safety measures can be

considered typical for Bangladeshi apparel suppliers; social acceptance of child labor may be common in certain agricultural communities where suppliers are based.

Answering questions related to “business relationships”

In many instances, identified impacts may be several tiers removed in the value chain; or a company may buy certain raw materials on a ‘spot market’ and not know who the “business partner” is. In the former case, diagnostic questions about business partners might be answered in the aggregate for all the entities between the company and the specific entity in the value chain that is or may be causing the impact. In the latter case, analysis may focus on known risks for certain commodities, for example sugarcane production is often associated with child labor and Uzbek cotton with forced labor. It is important to consider not only the systems that business partners have in place when assessing likelihood, but also the degree to which they may be contributing to impacts by others in the value chain.

Prioritization is relevant at different stages of human rights due diligence

As noted above in Section III, initially, it may be necessary for a company to make “educated guesses” about where potential risks might lie for the company as a whole – and to test these with key stakeholders. Once impacts have been identified, prioritization is again relevant in determining where to focus attention. Several companies use participation in a credible multistakeholder initiative as an indication that a business partner has a certain level of seriousness and/or systems in place that would reduce the likelihood that it is involved with negative impacts.

Taking into account existing (internal and external) mitigation measures

Several cases presented by companies in the workshop highlighted that risk mitigation strategies are already in place and that it could be helpful to take these into account when assessing likelihood and severity. Such strategies may be by the company itself or external to the company such as sector-based initiatives or certification schemes.

An example of mitigation measures in a mineral supply chain is included in Annex 4. The company took these measures into account in determining the contexts and business relationships where the risk of negative impacts is greatest. Discussions with expert stakeholders and other companies during the workshop gave the company confidence that it was taking a credible approach.

“When eating an elephant, take one bite at a time”

Company participants with experience of human rights due diligence acknowledged that the task may initially feel like “eating an elephant,” but emphasized the importance of getting started and doing the analysis “one bite at a time.” Expert stakeholders agreed that they do not expect companies to get it “all right the first time”, but that this should not prevent the company from addressing known risks. Rather, the focus is on whether the company is making reasonable and genuine efforts to take the perspective of potentially affected stakeholders into account, including through meaningful stakeholder engagement, when engaging in prioritization.

Stakeholder engagement is key to assessing severity and prioritization

Risk management is often a primarily internal exercise for companies. However, where it concerns prioritization of human rights impacts, stakeholder engagement is critical because:

- Understanding social, including human rights, risks often requires a qualitative assessment that companies find difficult to make on their own;
- Determining whether one human rights impact is more “grave” than another is often a delicate decision and companies may lack the required expertise. Indeed companies expressed discomfort with making these determinations on their own;
- Companies need to bring the perspective of potentially affected stakeholders “inside” and integrate it into their decision-making; expert stakeholders can be important proxies in this regard;
- Engaging stakeholders in the early steps of prioritizing risks avoids the perception (or reality) that stakeholders are only involved at the end of the due diligence process, when decisions have already been made.

Appropriately prioritizing impacts: Common pitfalls and challenges identified by workshop participants

- ***Focusing on risk to business vs. risk to stakeholders:*** Prioritization in traditional risk management processes (often called materiality analysis) is typically based on the size or proportion of business, reputational risks, or degree of control (eg, where the issue involves a first tier supplier). From a human rights perspective, prioritization should be driven by the severity of the impact(s) on affected stakeholders. This can pose challenges when seeking to integrate human rights risk prioritization into existing systems.
- ***Putting impacts into context:*** Companies found they needed to adapt key questions on likelihood to the particular sets of impacts under analysis. The value of the factors does not lie in rigidly applying them in every case, but rather to serve as a guide that informs the prioritization process and focuses it on risk to human rights, rather than risk to the business.
- ***Assuming all is well in the face of uncertainty or lack of information is risky:*** When answering diagnostic questions about likelihood and severity, workshop participants frequently felt that they were lacking critical pieces of information. Companies reported that they could be tempted to assume that, in the absence of clear information to the contrary, their business partners likely had the necessary policies and practices in place. However, they acknowledged that not knowing this information is a risk.
- ***Paralysis by analysis:*** Some companies may feel overwhelmed by the task at hand and either become stalled or try to do everything at once. Companies may therefore need to prioritize at an early stage based on educated guesses – which then get updated as they proceed with the more in-depth analysis required by appropriate prioritization. This can mean shifting back and forth from identification to prioritization, and frequently updating risk mappings. Prioritization should help a company to get started and to focus, while also improving the robustness of the human rights due diligence process over time.

V. Integrating and Acting on Identified Risks

Once companies have identified and appropriately prioritized impacts for attention, the Guiding Principles make clear that they need to take action to prevent, mitigate, and/or remediate the identified impacts. This section looks at the steps companies can take to integrate their findings and take action on potential impacts. (In-depth discussion of remediation of *actual* impacts which the company has caused or contributed to was beyond the scope of this workshop.)

A. Key Considerations

The larger the company, the more likely it is that those with responsibility for assessing impacts are different and sit apart from those responsible for the business activities or relationships that typically generate the impacts. Cross-functional engagement can therefore be key to effective integration and action – and indeed some company participants in the workshop deliberately invited representatives from the relevant departments, such as sustainability, procurement, health and safety, or key business relationship owners.

The type of action a company should take depends on how it is connected to the impact. The UN Guiding Principles and OECD Guidelines distinguish three ways in which companies might be involved with human rights impacts – **cause, contribution and linkage**. The implications of these different forms of involvement are summarized in the table below.

UNDERSTANDING IMPACT AND RESPONSIBILITY		
If we have...	...then we should...	
...caused (or may cause) the harm...	...cease or prevent the action causing the harm...	...and remediate the harm
...contributed to (or may contribute to) the harm...	...cease or prevent the action contributing to the harm; Use leverage to mitigate the risk that any remaining impact continues or recurs and contribute to remediation of the harm
...identified a linkage between the harm and our operations, products or services, but no cause or contribution...	...use leverage to mitigate the risk of the impact continuing or recurring to the greatest extent possible.	

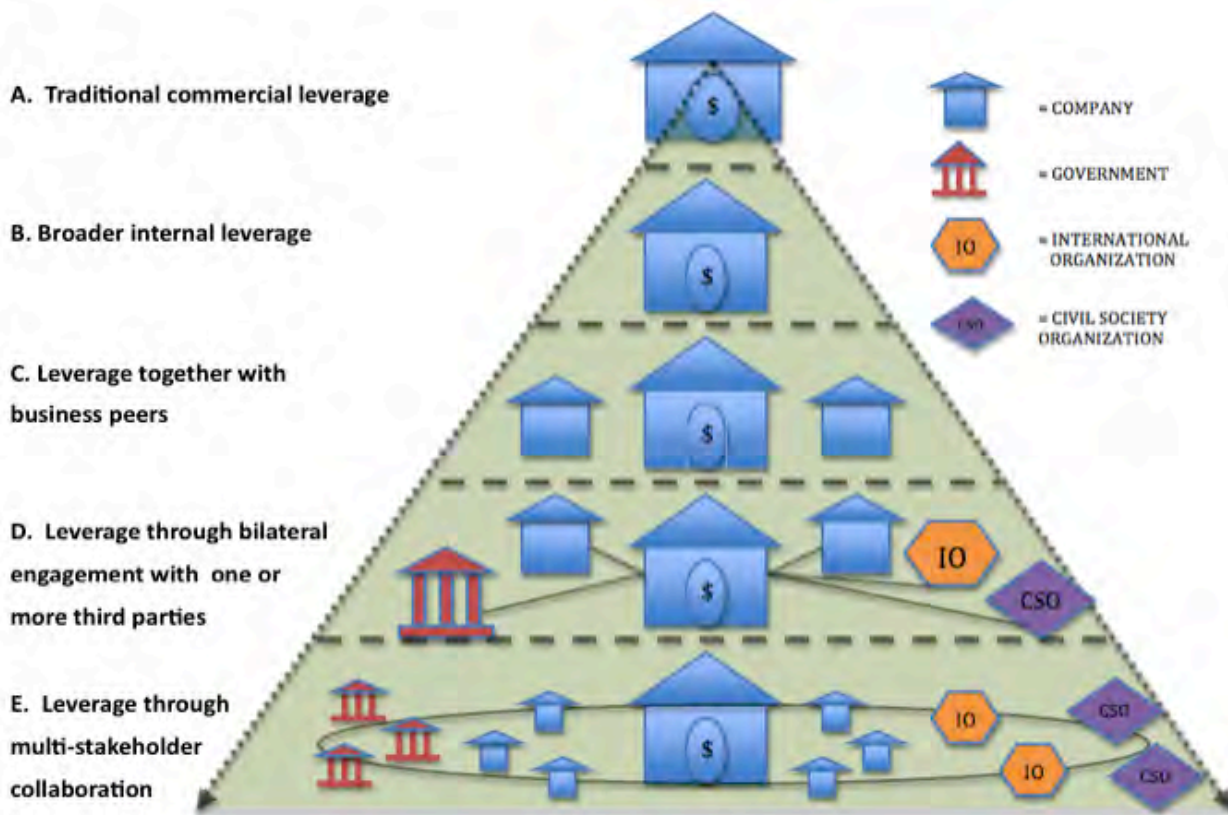
Leverage is a critical concept in taking action on human rights risks and impacts. Leverage means the influence a company has over the behavior of those entities that are or may be causing or contributing to negative impacts. This may include upstream suppliers, joint venture partners and other ‘horizontal’ business partners, down-stream business clients or customers.

The diagram below, which draws on Shift’s broader work on implementing the UN Guiding Principles³, shows different “sources” of leverage that companies can draw on or seek to build, namely:

- A. **Traditional commercial leverage** sits within the activities the company routinely undertakes in commercial relationships, such as contracting.
- B. **Broader business leverage** is leverage that a company can exercise on its own but through activities that are not routine or typical in commercial relationships, such as capacity-building.
- C. **Leverage together with business partners** is created through collective action with other companies in or beyond the same industry.

³ See further “Using Leverage in Business Relationships to Reduce Human Rights Risk.” See Annex 5 for link.

- D. **Leverage through bilateral engagement** is generated through engaging bilaterally and separately with one or more other actors, such as governments, business peers, international organizations, or civil society organizations.
- E. **Leverage through multistakeholder collaboration** is generated through collaborative action – collectively with business peers, governments, international organizations and/or civil society organizations.



B. Key Learnings from the Workshop

Understanding relationships in the value chain is critical to understanding leverage

Workshop participants found it helpful to map the value chain and their particular relationship with the different entities involved. For example, in the mineral supply chain that one company focused on (see Annex 2), there are only a handful of mining companies, while there are thousands of traders, so the mining companies have significant leverage over the traders. Therefore, it may appear to be more effective for financial actors in that sector to engage directly with the mining companies. However, if a bank has no direct relationship with the mining companies, but has customer relationships with 50-75% of the trading companies, then it may have significant leverage over that part of the value chain.

Another example involved a company seeking a joint venture partner in an African country. One of the potential candidates had many customers and the prospective business would never be more than 10 or 20% of its total business, whereas for the other business partner it might become 50% or more. This would give the company

potentially much more leverage over the latter as a partner than the former, which may be useful should significant human rights challenges arise in the course of the relationship.

Thinking creatively about increasing leverage

Thinking about and exercising leverage requires creativity because it is highly contextual. For example, merger and consolidation with another company may give a company more leverage over joint suppliers, as well as new ones, through the ability to offer bigger size contracts. Reducing the total number of suppliers can increase leverage to demand better implementation of a supplier code of conduct. Building long-term relationships with suppliers can provide a rationale for both parties to work on capacity-building. Partnering with a customer to jointly visit a subcontractor can help stress the importance placed by both companies on respect for labor rights as well as provide an opportunity to offer the supplier support where needed. Benchmarking what peers are doing to manage human rights risks can create internal leverage as well as providing useful ideas for the company's own efforts.

Leverage does not always require a contractual or other direct relationship; simply having a conversation can create its own leverage. Such a conversation could inform the counterpart about the importance of managing human rights risks, raise awareness of good practices, and lead to more structured engagement – and thus potentially greater leverage. Several company participants commented on the surprising effectiveness of simply starting with a conversation and urged others not to underestimate the power of persuasion.⁴

Building leverage with internal stakeholders

Individuals with responsibility for human rights in companies can often face the challenge of securing support from the business for these issues. Participants discussed one example where a business leader was seeking greater attention and resources for implementation of the company's human rights policy for which he had responsibility. The CEO had signed off on the policy and signaled its importance for the regional business units, which had their own resources that they could bring to bear. Participants discussed whether the company could mandate each region to devise its own human rights risk mapping and mitigation plan along the lines of the steps followed in the workshop.

The information obtained through grievance mechanisms can also increase leverage internally, with senior leadership and other colleagues in core operations, to dedicate attention and resource to prevention and mitigation of demonstrated risks.

Taking action alone is usually harder than with others

Because integration, including exercising and increasing leverage, requires creativity and collaboration, workshop participants reflected that the CSR/sustainability department or human rights lead is unlikely to be effective if acting alone. This has both an internal and external dimension.

Local knowledge about impacts and business operations often sit in other parts of the business from those with responsibility for human rights – as does ownership of the relevant business relationships. For example, procurement typically interacts with suppliers and has the ability to heighten their awareness of human rights risks and potentially to help build their capacity. Where procurement

“Being creative is always better done together than alone.”

-Workshop participant

⁴ For more on *Persuasion*, see Shift Workshop Report No. 4 (previous note), pp. 7-8.

practices, such as frequent last minute changes to orders, contribute to negative impacts by suppliers, then procurement needs to be closely engaged in adapting these practices.

Moreover, the kind of creative brainstorming often needed for effective integration and action can benefit from a diversity of viewpoints and expertise, which can come from different functions and managers from various levels in the company. Company participants overwhelmingly supported the role of external stakeholders in providing knowledge and expertise that does not exist within the company.

Participants discussed the situation where the company decides to stay in a relationship with a challenging business partner, for example because the entity's products or services are critical to conducting its business and there are no feasible alternatives. In being prepared to explain its decision to external stakeholders, it can significantly help if expert stakeholders have been engaged from the start in identifying the risks and trying to develop approaches to mitigate them.

Taking action on potential impacts: Common pitfalls and challenges identified by workshop participants

- ***Not understanding the business:*** A common pitfall for those responsible for addressing human rights risks is not fully understanding the company's business operations. In order to devise effective prevention and mitigation measures, it is critical to understand the nature of the relationship between the company and the party causing the impact. Without such understanding key business colleagues are likely to regard suggestions made as unrealistic and/or unnecessarily burdensome.
- ***Not having defined the impact in the first stage:*** Integration is about taking action to prevent or reduce the likelihood of an impact occurring or recurring. If a company has not been sufficiently specific about an impact, it will be hard to determine what action to take, and it may be necessary to go back to the first step. Going through the steps in a disciplined way may save time and frustration later on. As participants put it: "go slow to go fast."
- ***Fear of involving expert stakeholders:*** Many companies are still wary of engaging "critical friends". But the workshop showed that stakeholders were willing to take valuable time to engage with companies that committed to share their risks and challenges openly – albeit in a confidential setting. All company participants confirmed this as the highest value of the workshop.
- ***Not being creative enough:*** Particularly where a company lacks commercial leverage through direct contractual relationships or size of business, creativity is important. Bringing more and different voices in the room and working with others can increase the range of ideas needed for effectively increasing leverage.

VI. Conclusion

Human rights due diligence, including identification, prioritization and action on human rights impacts, is not an easy task. Especially for companies relatively new to the concept, conducting human rights due diligence may at first feel overwhelming and complex. Nevertheless, workshop participants overwhelmingly agreed that going through the steps systematically, engaging in cross-functional conversations with colleagues and peers, and the interaction with expert stakeholders on concrete human rights challenges and approaches had been immensely valuable for their learning and for moving forward internally with more robust human rights due diligence.

Participants widely supported the following points of advice for companies new to these issues.

Advice for Companies from Workshop Participants:

- *Human rights due diligence is about having the right kinds of conversations internally with all the relevant parts of the business, as well as with affected and expert stakeholders externally;*
- *Companies have to work hard to put the focus on potential harm to stakeholders (vs. risk to business);*
- *The focus on impact rather than influence is relatively new for many companies, so it is important to guard against the tendency to take action only where the most leverage can be found;*
- *Do not overcomplicate the process but do start with a thorough analysis of the problems, before trying to identify solutions;*
- *An initial approach can be to conduct a relatively quick impacts identification process relying on “educated guesses” and to iteratively improve it over time; however, even (or especially) in this mode, engagement with expert stakeholders remains key;*
- *Human rights is not a stand alone issue and it can be useful to rely on existing channels within the corporate structure, however human rights need specific attention as it is a relatively new concept and can feel complex to companies, therefore: “unpack and repack” the issues, and learn from company experience addressing other topics (eg, health and safety, environment);*
- *Some pragmatism may be appropriate: stick to a key risk area or impact and move forward on it (ie, do not let the perfect be the enemy of the good) but check with expert stakeholders that you are focusing on a significant issue;*
- *Think hard and creatively about creating leverage, including by working with colleagues, peers, expert stakeholders and others.*

Next steps

Participants were keen to follow up on the workshop by: reconvening to share experiences; inviting new companies in to the discussion; and/or focusing on the remaining steps in human rights due diligence and on remediation.

The SER will incorporate the lessons learnt from the workshop into the various outputs from its due diligence workstream, including an online module, a thematic report and a project to develop guidelines to integrate “CSR due diligence” into existing business risk management systems executed by The Netherlands Standardization Institute (NEN). The outcomes of the SER and Shift workshop will also be presented at a conference on CSR due diligence on March 6, 2014 at the SER.

Quotes from participants:

- *“Diverse perspectives (multi-stakeholder) are key to bring this discussion and practice further.”*
- *“Not new to me but definitely a take-away: civil society needs to obtain knowledge on business practice and dilemmas to be a valuable critical friend.”*
- *“Just get started – don’t panic that you can’t address everything at the same time.”*
- *“All companies and stakeholders struggle with the subject. This does not mean that it’s too complex.”*
- *“Going through the steps was a kick-starter for our internal due diligence process.”*
- *“In relation to your suppliers and other business partners, move away from being the policeman, and move forward as partners.”*
- *“The what and the how are important, but don’t forget the why!”*

Annex 1:

Company example of an activities-stakeholders-impacts mapping

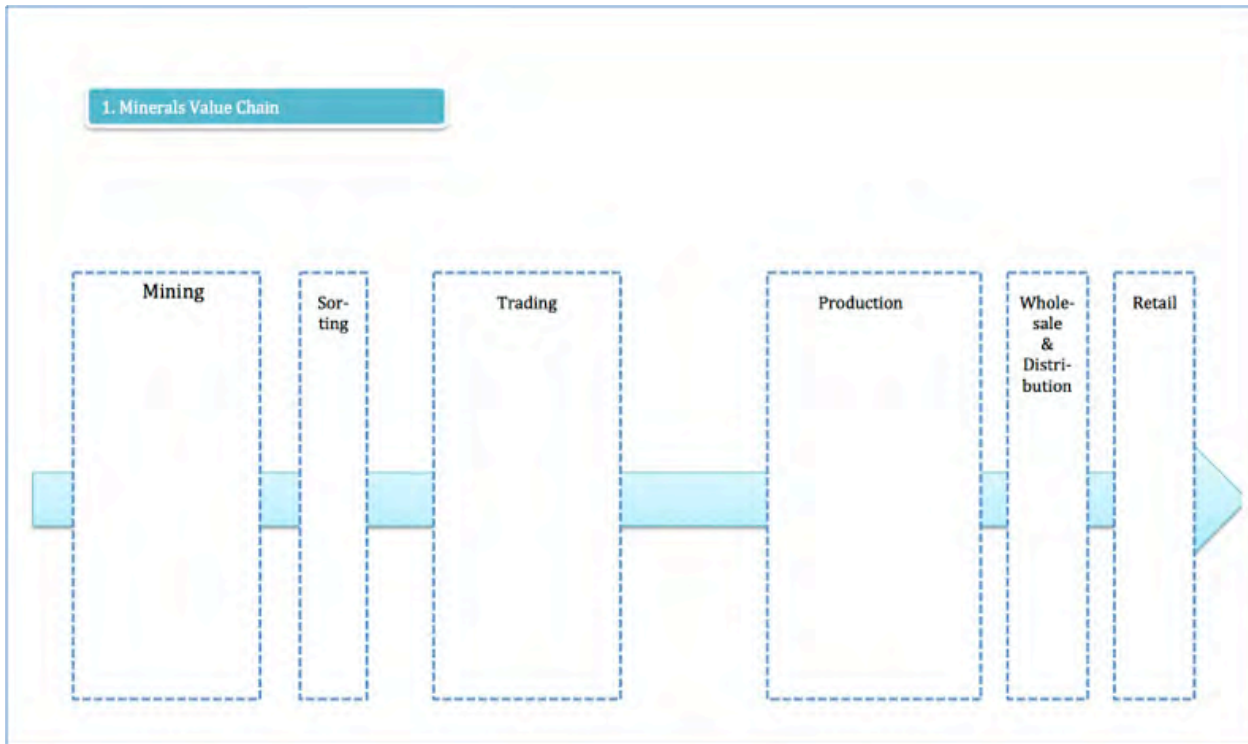
The table on the next page shows the results of a three-step process for mapping adverse human rights:

- *first, the company brainstormed all the activities (including through third parties) it will engage in for a particular product it produces and sells (Letters A to G listed in the rows);*
- *it then listed all the stakeholders that may be impacted by these activities (Number 1 to 5 listed in the columns); and*
- *thirdly, it brainstormed the potential impacts and their human rights dimensions (individual cells).*

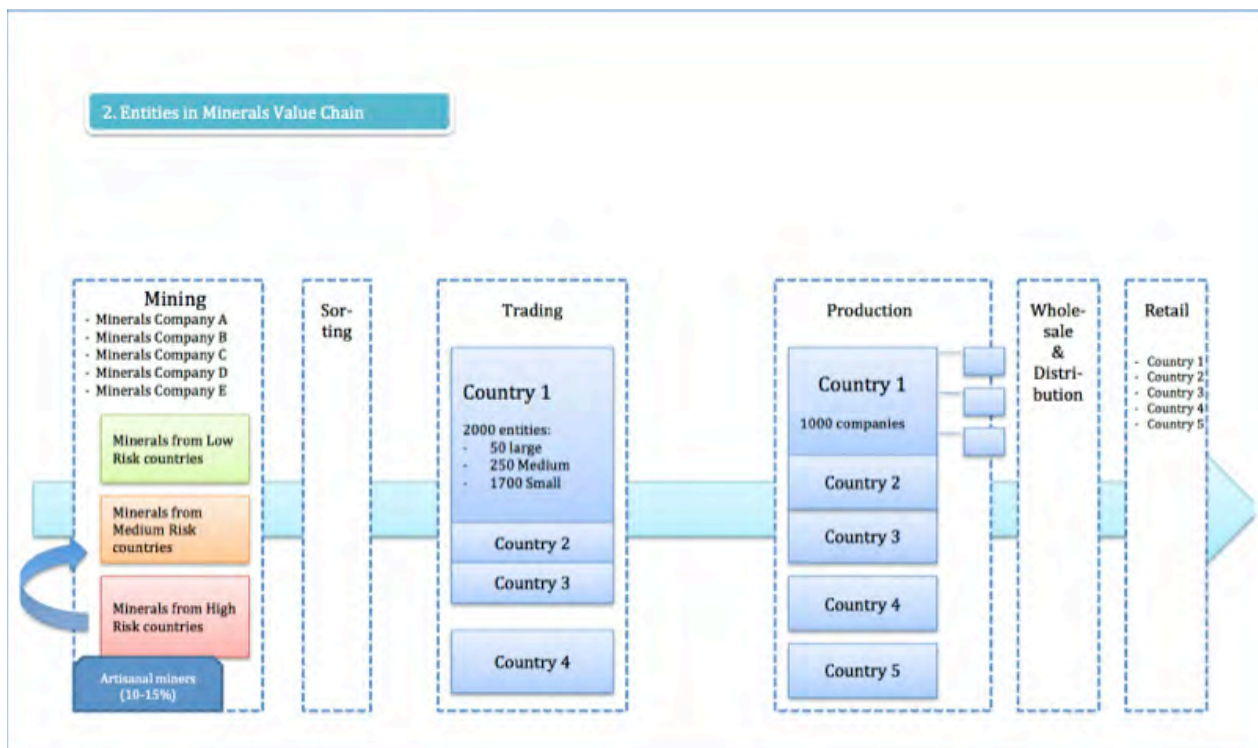
Note that not all cells can (or necessarily should) be filled out, although this may change as new risks arise. This matrix should not be static but an evolving tool.

	POTENTIALLY AFFECTED STAKEHOLDERS				
ACTIVITIES	1. Company staff	2. Workers at business partners	3. End users	4. Community members	5. Vulnerable people
A. Procurement	Local authorities can seize travel documents of staff in case of investigations making it impossible to travel-Right of freedom of movement (could occur throughout)	Container production is known to involve potentially (severe) impacts on workers' labor rights-Right to health, life, free from forced labor, freedom of association, right to collective bargaining, non-discrimination, fair wages, decent working hours.		Steel production has been associated with deforestation, displacement of people and loss of livelihoods. Steel production involves the use of large amounts of coal, mining of which has been associated with severe human rights violations.	
B. Production/ Manufacturing		Impacts on worker health and safety and labor rights (both in NL and Kenya)-Right to health, fair wages, freedom of association. Galvanizing (e.g. during process and as waste) may cause long-term health impacts—right to health		Noise and pollution from factory could affect local population around factory.	
C. Branding/ Sales / Marketing		Sales staff may face unrealistic targets or not receive adequate compensation-Right to fair wages, livelihood.		Community members may face undue pressures to "accept" a new installation.	Vulnerable members may feel disadvantage by a new installation, because may not have equal access to water. Right to non-discrimination.
D. Transport and Warehousing	When traveling to remote areas, staff could get into accident or face security threat (kidnapping)-Right to health, life	Working conditions on container ships may be in violation of labor rights. Truck drivers may have to drive on roads that are unsafe and where accidents happen frequently-Right to health, life Working conditions at warehouse		Unsafe driving of transportation trucks could cause incidents involving local population-Right to health, life. Not properly maintained installation could lead to oil spill, which may cause long-term damage on health of workers and community members—right to	
		(eg. unsafe use of forklifts; lifting weight) could lead to impacts on health-Right to health If warehouse is attacked/ robbed (because of valuables), could lead to security incidents-Right to life, security of person.		health, life.	
E. Installation/ Maintenance	When company staff go out to remote areas, could face dangers (e.g. attacks, getting stuck on the road)-Right to health, life.	When workers go out to remote areas, could face dangers-Right to health, life, security of person.	Lack of safety measures (e.g. access to construction site)-Right to health, life.	Lack of safety measures (e.g. access to construction site)-Right to health, life.	
F. Operations/ Consumption			Polluted drinking water could lead to adverse health-affects. Water installations could be sabotaged (e.g. poison added to extract compensation)-Right to health, life. Nurses have labor rights (e.g. dismissed by strike)-Right to fair wages, freedom of association.	Installations could attract elephants and other animals, which could affect local people's safety-Right to health, life, security. Failure of installation could lead to adverse impacts on people surrounding installations (eg. blades falling off)-Right to health, life.	Certain groups may not have equal access to the water, because they may not be able to afford it or are not part of the dominant tribe-Right to non-discrimination, equal access to water. As initially it is expected that the installations would be sold to hospitals and schools, patients and children are likely to be especially vulnerable to adverse health impacts from polluted water.
G. Waste and Recycling			Consumers may feel disadvantaged when installation is removed.	Disposable bottles. (e.g. waste) may cause long-term damage to environment—right to livelihood If device is not removed after life cycle, it may pose dangers to community members (eg. blades falling off, refrigerant)-Right to health, life.	

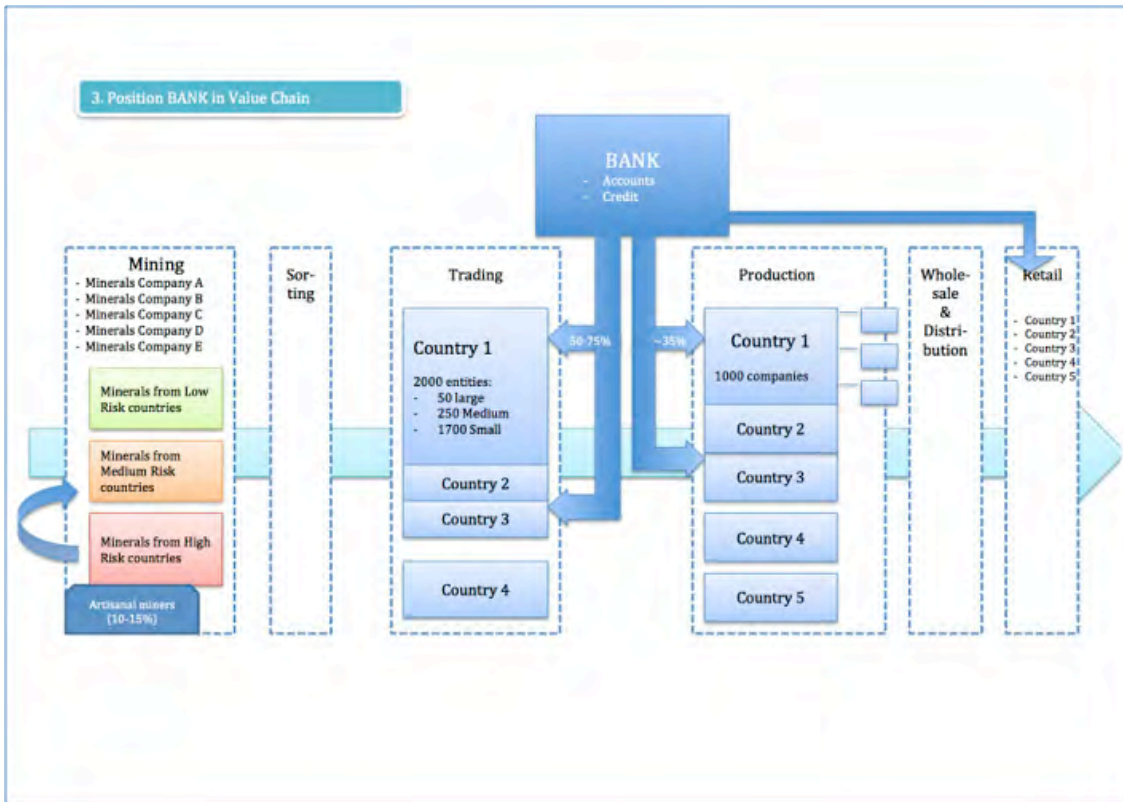
Annex 2: Company example of a mapping of potential human rights impacts in a mineral value chain



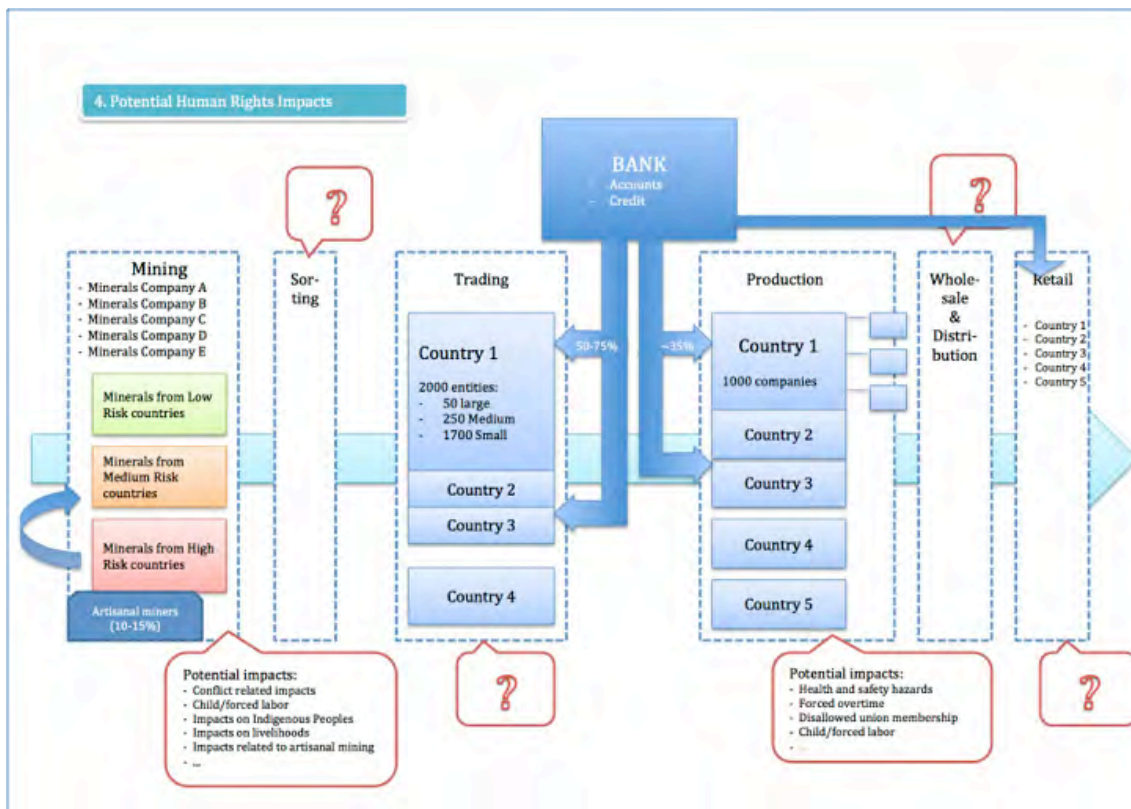
The company first started to draw the various parts of the value chain (recognizing there may be intermediate steps not yet drawn)



It then listed the main countries and number of entities in relevant parts of the value chain.



The company then mapped its direct relationships with customers and the percentage of the market it covers (note that the Bank does not have direct relationships with the mining companies)

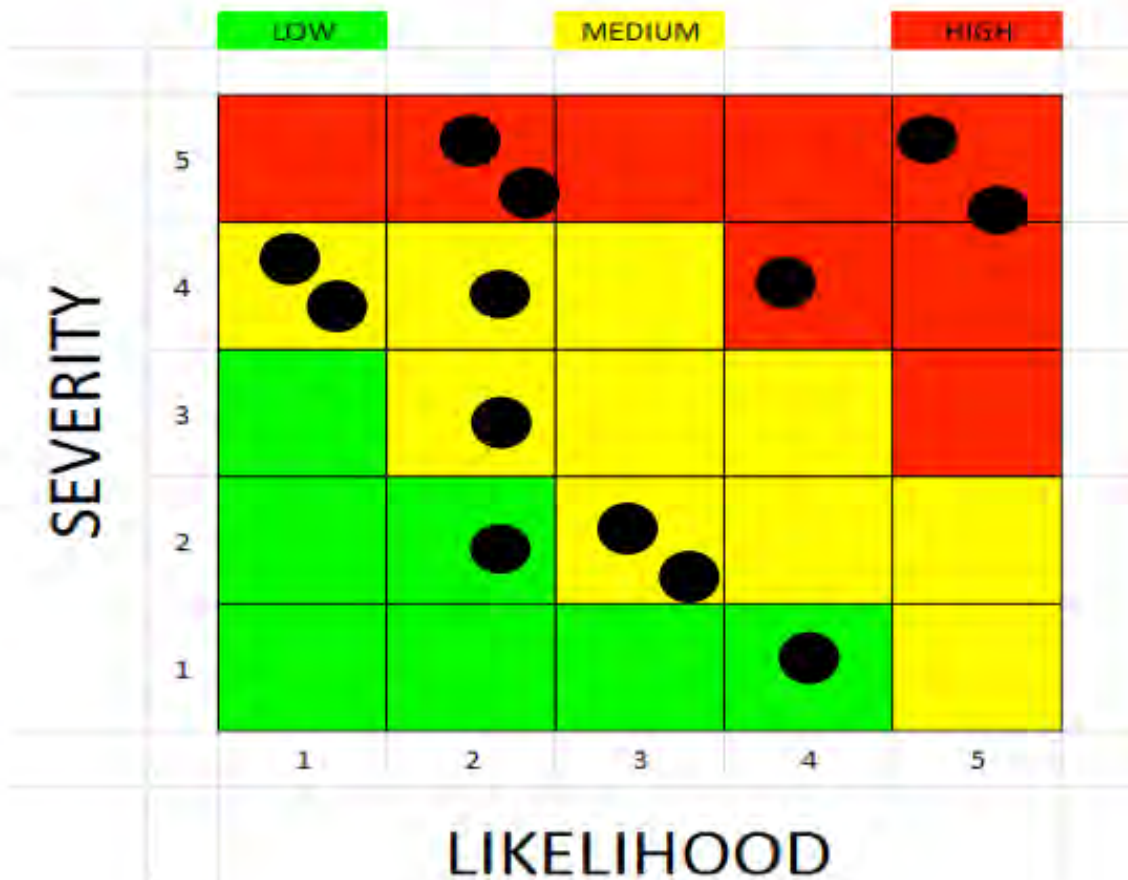


It then did investigations for potential human rights impacts. This is an ongoing process and still needs completion, but so far “mining” and “production” have been identified for potential impacts.

Annex 3: Company example of a likelihood-severity risk matrix

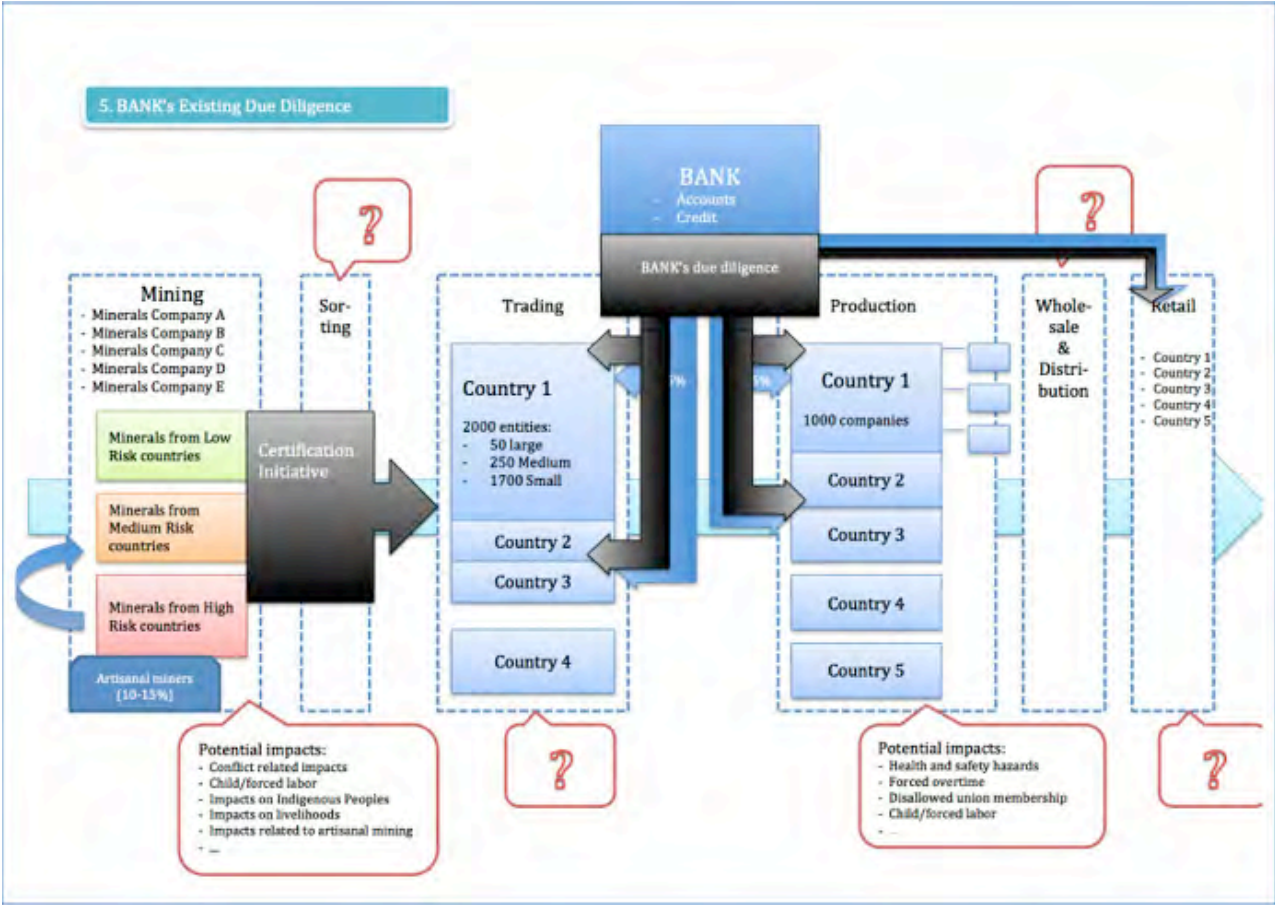
Note: some high-likelihood/high-severity impacts have been added for illustrative purposes.

Impact Identified	L	S	R
Employees can be involved in events that can put in danger their life	2	5	H
Possibility of attacks in certain countries or environments	2	5	H
Employees can be pressured to work overtime, or work without the adequate conditions of Health and Safety	2	2	L
The condition of living provided by the Company and the Clients could not be adequate	3	2	M
Failure to implement the Health standards by the Client (he could not provide a healthy work environment).	3	2	M
Water and sanitation conditions may be deficient	2	3	M
Employees could be subjected to discrimination during their activities	1	4	M
Minorities can be subjected of discrimination during the execution of their activities	1	4	M
Candidates can be discriminate during the recruiting process	2	4	M



Annex 4: Company example of prioritization—taking into account existing mitigation measures

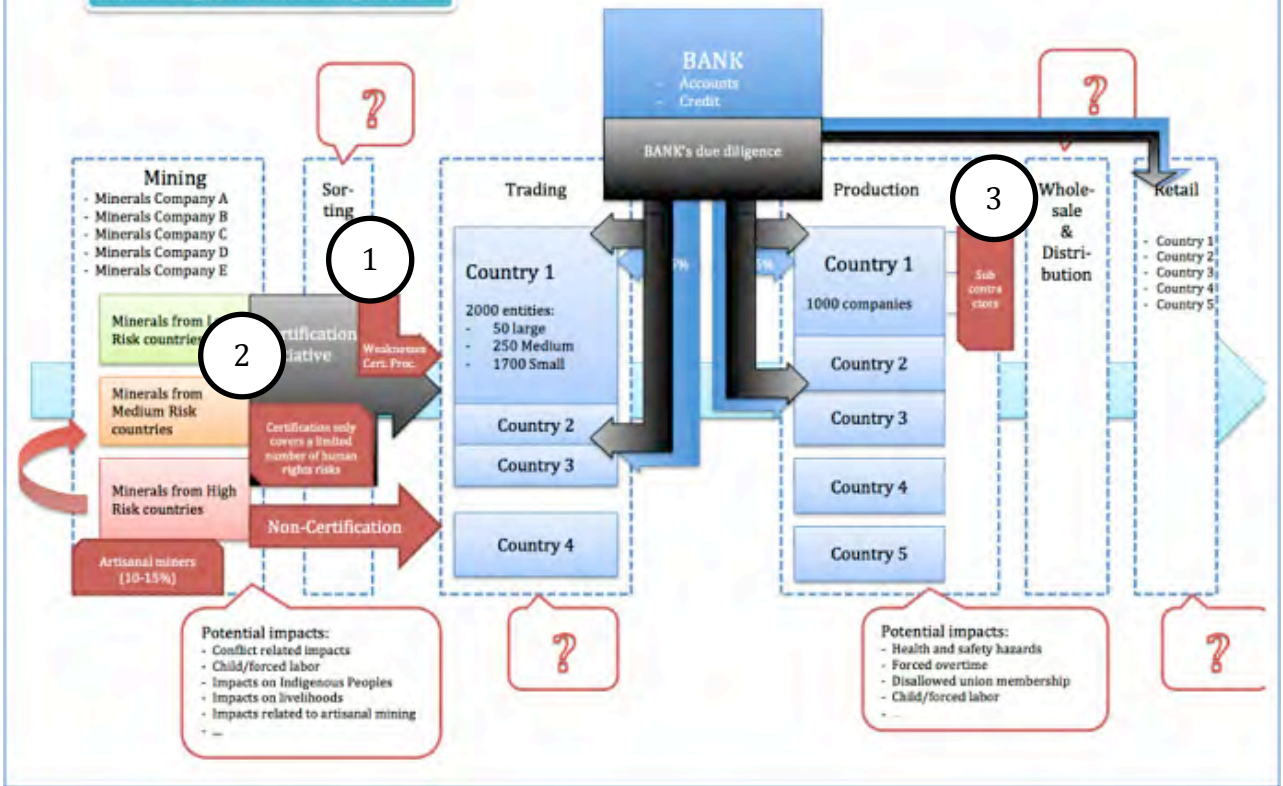
The following diagram shows that the bank (following from the example in Annex 2) already carries out due diligence on its customers in trading and production. It also includes the external certification scheme that mined minerals are subject to before being bought by the bank’s customers.



The diagram below then shows where the remaining risk areas can be found after accounting for existing (internal and external) due diligence mechanisms. These were identified by the bank, among others, to include (numbers match those in the diagram below):

1. There are documented weaknesses in the certification process, meaning that some minerals from high risk countries (associated with gross human rights violations) may still be certified.
2. The certification process does not assess all human rights abuses involved in mining, but focuses only on gross human rights violations.
3. In peak seasons the production companies may outsource some of their work to subcontractors in the informal sector, which has a higher likelihood of involving child labor and other labor rights abuses.

6. Remaining Areas of Human Rights Risks



Annex 5:

Recommended reading and other resources

1. Introductory/general materials on the UN “Protect, Respect and Remedy” Framework, the UN Guiding Principles, and the OECD Guidelines for Multinational Enterprises:

1.1 United Nations Guiding Principles on Business and Human Rights: http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

1.2 The Corporate Responsibility to Respect: An Interpretative Guide: http://www.ohchr.org/Documents/Publications/HR.PUB.12.2_En.pdf

1.3 The online portal of former Special Representative John Ruggie: <http://www.business-humanrights.org/SpecialRepPortal/Home>

1.4 OECD Guidelines for Multinational Enterprises (sections I, II, IV, and V): <http://www.oecd.org/daf/inv/mne/48004323.pdf>

1.5 Business and Human Rights – A Brief Introduction: <http://www.business-humanrights.org/GettingStartedPortal/Intro>

2. Specific sources on human rights risk identification, prioritization and integration and action:

2.1 European Commission Sector Guides on the Guiding Principles; for assessing human rights risks and impacts, see in particular section II in each of the guides; for mitigation, see section III in each report:

2.1.1 Oil & Gas: http://ec.europa.eu/enterprise/policies/sustainable-business/files/csr-sme/csr-oag-hr-business_en.pdf

2.1.2 ICT: http://ec.europa.eu/enterprise/policies/sustainable-business/files/csr-sme/csr-ict-hr-business_en.pdf

2.1.3 Employment & Recruitment Agencies: http://ec.europa.eu/enterprise/policies/sustainable-business/files/csr-sme/csr-era-hr-business_en.pdf

2.2 In the Interpretative Guide (1.2), see in particular:

2.2.1 For identification and prioritization: pages 18, 19, 28, 36-45, 82-85.

2.2.2 For mitigation: pages 26-31, 46-52.

3. Other relevant Shift publications:

3.1 Respecting Human Rights Through Global Supply Chains: <http://www.shiftproject.org/publication/respecting-human-rights-through-global-supply-chains-shift-workshop-report-no-2>

3.2 Embedding Respect for Human Rights: <http://www.shiftproject.org/publication/embedding-respect-human-rights-shift-workshop-report-no-1>

3.3 Bringing a Human Rights Lens to Stakeholder Engagement: <http://www.shiftproject.org/publication/bringing-human-rights-lens-stakeholder-engagement-shift-workshop-report-no-3>

3.4 From Audit to Innovation: Advancing Human Rights in Global Supply Chains: <http://www.shiftproject.org/publication/audit-innovation-advancing-human-rights-global-supply-chains>

4. Sources for learning about human rights risks and issues:

4.1 Business and Human Rights Resource Center:

4.1.1 By region/country: <http://www.business-humanrights.org/Categories/RegionsCountries>

4.1.2 By individual company (eg. to look up issues related to a specific business partner): <http://www.business-humanrights.org/Categories/Individualcompanies>

4.1.3 By human right/issue: <http://www.business-humanrights.org/Categories/Issues>

4.1.4 By Sector: <http://www.business-humanrights.org/Categories/Sectors>

4.2 US State Department Country Human Rights Reports: <http://www.state.gov/j/drl/rls/hrrpt/>

4.3 US Department of Labor List of Goods Produced by Child and Forced Labor (per country): <http://www.dol.gov/ilab/reports/child-labor/list-of-goods/>

4.4 Danish Institute for Human Rights' Human Rights and Business Country Guide (currently covers Argentina, Brazil, Colombia, Denmark, Peru, Zambia and Zimbabwe): <http://hrbcountryguide.org/>

4.5 Amnesty International Country Reports: <http://www.amnesty.org/en/human-rights/human-rights-by-country>

4.6 Human Rights Watch country overview: http://www.hrw.org/browse_by_country

4.7 Global Compact Human Rights and Business Dilemmas Forum: <http://human-rights.unglobalcompact.org/>

4.8 MVO-Nederland CSR Risk Check: <http://www.mvorisicochecker.nl>

Annex 6:

List of participants

ORGANISATION	NAME	
ABN AMRO	Ghislaine	Nadaud
ABN AMRO	Maria Anne	van Dijk
ABN AMRO	Iris	van den Akker
AkzoNobel	Elizabeth	Stokes
AkzoNobel	Frederike	Stikkelbroeck
AkzoNobel	Dick	Bartelse
DADTCO	Renske	Franken
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Geolog International	Martin	Bognanni
Geolog International	Matteo	Pellegrini
H2OnSite	Marco	van der Vliet
Heineken International	Ruud	van der Wel
KLM	Daan	Bos
KLM	Nao	Dekker
KLM	Nadia	Cicek
KLM	Jacqueline	Houweling
Nidera	Aukje	Berden
Nidera	Lies	Dieben
Nuon	Joël	Frijhoff
Nuon	Monica	Bowen-Schrire
Nutreco	Jose	Villalon
Triodos	Ellen	Willems
Triodos	Iris	Lether
VimpelCom	Anna	Boyko
VimpelCom	Chris	Burgess
Amnesty International	Heleen	Tiemersma
Cordaid	Eelco	de Groot
FMO	Karin	Verstralen
FNV	Sascha	Meijer
Human Rights@Work	Liesbeth	Unger
Oxfam Novib	Johan	Verburg
SOMO/OECD Watch	Joris	Oldenziel
VBDO	Saskia	Verbunt
MVO Nederland	Shirley	Justice
NEN	Dick	Hortensius
Global Compact Netherlands	Huib	Klamer
CSR Europe	Mariya	Stoyanova
Netherlands Ministry of Foreign Affairs	Janneke	Faber
Netherlands Ministry of Foreign Affairs	Bas	Heerma van Voss
Netherlands National Contact Point (NCP) for the OECD Guidelines	Herman	Mulder

Shift
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David		Vermijs
David		Kovick
Alexandra	van	Selm
Martijn	van de	Sande