NAVIGATING RISK AND RESILIENCE:

LEARNINGS FROM DIALOGUES BETWEEN HUMAN RIGHTS DEFENDERS AND BUSINESS



BUSINESS NETWORK ON CIVIC FREEDOMS & HUMAN RIGHTS DEFENDERS

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ABOUT THE BUSINESS NETWORK

The Business Network on Civic Freedoms and Human Rights Defenders (Business Network) is a group of companies committed to identifying ways that businesses and society can benefit from increased support from the private sector for the protection of civic freedoms and human rights defenders (HRDs).

Initiated in 2016, the Business Network Secretariat is coordinated by the **Business and Human Rights Centre (BHRC)**, the **International Service for Human Rights (ISHR)**, and **The B Team**. Approximately 40 major multinationals currently participate in the Business Network, representing a wide range of sectors. The Business Network's regular activities involve the participation of businesses, civil society (NGOs, community representatives, union leaders and other frontline human rights defenders), investors, international institutions, and academia.

Business and Human Rights Centre

International Service for Human Rights

THE B TEAM



EXECUTIVE SUMMARY

Human rights are a fundamental element of long-term business viability and a core driver of resilience. More than just the "right thing" to do (or a compliance obligation), when businesses proactively respect human rights and civic freedoms in the jurisdictions where they operate, everybody benefits. Predictable and stable policy and operating environments support reliable and prosperous markets, minimise supply chain risks and reputational hazards, and enable long-term value creation. But how can business leaders ensure that their human rights practices position their organizations for success? Human rights defenders offer a wealth of knowledge and lived experience to guide businesses.

This publication offers collective learnings to guide internal company thinking and supplement official guidance. Developed from years of dialogue between human rights defenders and business leaders, it highlights key considerations for colleagues across your business, giving insights for development of stakeholder trust, and overall setting up engagement for long-term resilience. Throughout discussions, human rights defenders have consistently called on companies:

- To respect their rights and the rights of everyone in their communities.
- For human rights due diligence that includes meaningful stakeholder engagement throughout the process, including before projects or new business relationships have started.

Designed for maximum flexibility, this document allows you to dive straight into the topics most relevant to your needs, guided by three core focus areas. Key takeaways include:

- **Internal Action:** Establishing robust corporate policies co-created with rights-holders (including zero-tolerance for reprisals, SLAPPs, and illegal land acquisition), integrating continuous HREDD with strict FPIC compliance and heightened scrutiny in high-risk zones, and bridging operational gaps through contractually binding rules and upskilled management.
- **Board Governance and Leadership:** Establishing formal board oversight mandates for policy approval, risk review, and reporting; driving C-suite operational accountability for cascading strategies and securing resources; and investing in direct frontline stakeholder dialogue, scenario testing, and leadership education.
- **External Engagement:** Building proactive two-way stakeholder dialogue with rights-holders to address power imbalances and embed feedback; meeting evolving investor expectations through transparent reporting; and mobilizing collective leverage with trade unions, civil society, governments, and peers to protect civic space.

- **Key considerations** for colleagues across your business
- **Insights** for development of stakeholder trust
- **Setting up engagement** for long-term resilience

LEARNINGS FROM DIALOGUES

The learnings highlighted in this document reflect the diverse contributions made during ten years of business-civil society dialogues. It is not intended to be exhaustive or authoritative. For official guidance, please consult the **2021 UN Working Group guidance** on human rights defenders and other Key Resources listed at the end of this document.

INTRODUCTION

Long-term value creation is no longer solely about generating financial returns; it depends on a stable, thriving society where workers, communities, and ecosystems can flourish. Because companies and civil society operate within and depend upon this mutual foundation – a shared operating environment – protecting that space is essential. Yet, that foundation is being tested like never before. Powerful forces, including environmental crises, geopolitical turbulence, and the erosion of civic space, are reshaping the global landscape, demanding forward-thinking leadership characterized by a renewed form of engagement with human rights defenders and local organizations.

The global operating environment is undergoing a systemic shift characterized by a sustained contraction of civic space, with the **vast majority of the global population** now living in countries with severely restricted civic freedoms. The erosion of civic freedoms and human rights is regularly highlighted as a risk by the **World Economic Forum**. Furthermore, as those who voice concerns about human rights and environmental harms increasingly face retaliation, a **decade-long analysis** by the Business and Human Rights Centre reveals a systemic crisis of thousands of documented attacks against human rights and environmental defenders across all business sectors.

As established in **landmark UNDP research**, the perceived trade-off between human rights and economic competitiveness is a false dilemma. Business leaders must recognize that attacks on defenders are a leading indicator of commercial risk; the silencing of critics is almost always a precursor to the decay of the rule of law. Unaddressed human rights impacts and community opposition affecting sectors ranging from mining and energy to renewables and data centers, can lead to significant value erosion and project delays. Groundbreaking **research focused on the extractive sector** established that social conflict can cost major operations upwards of **$20 million per week**. Without a free civil society to act as an early-warning system, companies lose their primary mechanism for identifying human rights abuses – including labor exploitation, forced displacement, discrimination, gender-based violence, restrictions on freedom of association and expression, abuses of Indigenous Peoples' rights, environmental harms, and corruption – before they escalate into systemic instability.

In this volatile environment, businesses face significant pressure, presenting a **decisive opportunity for leadership**. While the easiest path is often a defensive retreat, a more resilient strategy is emerging among leaders who recognize that long-term value and enterprise resilience depend on proactive risk mitigation and strong community trust.

$20m

Groundbreaking research focused on the extractive sector established that social conflict can cost major operations upwards of **$20 million per week**

This compilation of learnings builds on the collective wisdom of the wider business and human rights community and draws from years of dialogue between human rights defenders and business leaders. We are deeply grateful to HRDs from around the world who have shared their lived experiences and guidance with companies through these Chatham House rule dialogues over the years – this document brings together some of their insights and asks for business.

Grounded in core foundational frameworks, including the **UN Guiding Principles on Business and Human Rights**, the **UN Working Group guidance on human rights defenders**, and the Business and Human Rights Centre and ISHR's **2025 retrospective analysis**, this publication also draws heavily on the **Shared Space Under Pressure** report. That report underscored a fundamental reality: **civic space is as vital to sustainable business as it is to society**. Companies are urged to *"engage and to act – carefully but deliberately – in their own interests and in the mutual interest that they share with civil society."* Structured for maximum adaptability, this publication enables leaders to dive straight into the specific topics most relevant to their operational needs.

> "Companies are urged to engage and to act – carefully but deliberately – in their own interests and in the mutual interest that they share with civil society."



METHODOLOGY

The learnings highlighted in this publication are based on a synthesis of the contributions of more than 200 human rights defenders (HRDs) and more than 50 business representatives, who participated in more than 60 business-civil society sessions organized by the Business Network between 2017 and 2025.

As these learnings reflect the diverse contributions made during these dialogues, this document is not intended to be exhaustive or authoritative. The Business Network Secretariat readily acknowledges the tireless efforts of human rights and environmental defenders, especially those on the frontline, and the research and guidance on these topics by others in the business and human rights space.

This document is based on views shared by HRDs over many years and does not necessarily represent the views of each defender that participated in the dialogues that make up the Business Network Secretariat.

LEARNINGS: FROM COMMITMENT TO ACTION

This publication contains takeaways to help companies transition from human rights commitments to credible action. It is based on conversations between HRDs and companies through the Business Network on Civic Freedoms and HRDs. This is organized into three sections:

1. **Internal Action to strengthen human rights and sustainability across the business:** The foundational work of identifying risks, codifying commitments, and embedding solutions into the business.
2. **Governance and Leadership Engagement:** Top-down oversight, formal board mandates, and executive education to drive internal accountability and enable direct leadership dialogue with affected stakeholders.
3. **External Engagement:** The proactive, external-facing work to build coalitions, drive transparency, and scale impact, with stakeholders including human rights defenders, investors, governments and peer companies across sectors.

This integrated approach moves a company from a state of compliance to one of implementation and strategic resilience, positioning human rights and the protection of HRDs and civic space as a core element of long-term business value.

1 PART ONE



INTERNAL ACTION TO STRENGTHEN HUMAN RIGHTS AND SUSTAINABILITY ACROSS THE BUSINESS

From initial risk-mapping to policy creation and practical, on-the-ground implementation, this section highlights learnings for internal action, raised during dialogues between human rights defenders and representatives from business.

KEY ACTIONS AT A GLANCE

1. **Codify & Enforce Policy Commitments:** Establish explicit corporate policies prohibiting reprisals, SLAPPs, and illegal land acquisition – co-created with rights-holders and enforced globally and locally.
2. **Embed Continuous Due Diligence:** Integrate HREDD into core operations, maintaining strict FPIC compliance and heightened scrutiny in conflict-affected or high-risk zones.
3. **Operational Execution:** Bridge policy and practice by closing internal information silos, upskilling regional management, and translating commitments into contractually binding rules.

PART ONE:

1 ADOPTING AND IMPROVING CORPORATE POLICIES ON HRDS AND HUMAN RIGHTS

1.1

Policies serve as the organization's constitution. However, their value lies both in how they are drafted and their implementation. To be effective, defenders have emphasised that policies must be built on **inclusive design**, adapted to navigate **complex local contexts**, and backed by **enforceable accountability** across the business. Key learnings from discussions between business and human rights defenders include:

1. Ensure Robust Scope, Specific Wording and Inclusive Design

- **Create a Corporate Policy on HRDs:** Develop, publish and implement a specific corporate policy on how the company will engage with and protect human rights defenders that includes a zero-tolerance stance on threats and violence against HRDs, as well as on illegal land acquisition and requires Free, Prior, and Informed Consent (FPIC) of Indigenous Peoples.
- **Implement a Zero-Tolerance Policy:** Publish and enforce a zero-tolerance policy for reprisals against human rights defenders, approved at the senior management level.
- **Embed Indigenous Rights, Self-Determination, and FPIC:** Acknowledge and address the heightened and disproportionate risks faced by Indigenous defenders and create and implement public commitments to respect Indigenous Peoples' rights. Ensure this is grounded in their rights to self-determination (lands, territories and resources), and the right to FPIC, including their right to define the process by which FPIC is achieved and to withhold consent (Official guidance here).
- **Prohibit SLAPPs:** Expressly commit to refraining from all forms of intimidation, including judicial, legal and financial attacks against human rights and environmental defenders, and civil society organisations that support affected rights-holders. Publicly pledge to end the use of Strategic Lawsuits Against Public Participation (SLAPPs).
- **Co-Create with Rights-Holders:** Human rights defenders and affected stakeholders should be directly involved in the development, review, and implementation of company policies on engagement. This ensures the policy reflects the reality of those it intends to protect.
- **Reject False Neutrality:** Recognize that one cannot be neutral in a situation of harm or human rights violations. "Extreme neutrality" is an extreme position in itself; policy should reflect a commitment to stand against abuse.
- **Map Independently & Comprehensively:** Policy scope should be based on a comprehensive mapping of who is affected and who has specific rights (e.g., Indigenous Peoples). This mapping must be done by the company itself, with input from HRDs and other human rights experts – not relying solely on government versions – and should include the effect of company actions on external parties.
- **Scrutinize Policy Language:** The specific wording of policies matters. It sends a signal about intent and enforceability. Avoid vague or passive language that allows for evasion. Use strong, unequivocal terms (e.g., "zero tolerance" rather than "strive to avoid") to reduce ambiguity and demonstrate serious commitment.

1.1

2. Set Parameters for the Strongest Protection in the Global-Local Contexts

- **Localize and Translate:** A global policy must be translated into local languages and culturally into local contexts. Company subsidiaries must be part of this conversation to ensure relevance and ownership on the ground.
- **Prioritize Civic Freedoms Over Local Limitations:** Recognize that open civic space is the essential enabling environment for engagement. Where this is absent, company policy must explicitly reflect respect for and promotion of civic freedoms in line with international human rights standards, surpassing local minimum standards.
- **Uphold Global Standards Against State Harm:** In contexts where the state itself contributes to harm or local laws are insufficient, the company must rely on its global procedures and management systems to assess and mitigate risk, rather than deferring to the local standard. Where mitigation is not feasible, responsible disengagement may be the only option.
- **Monitor for Legislative Red Flags:** As part of a continuous due diligence process, develop internal indicators to raise immediate alerts for company attention, such as the introduction of national laws that prohibit human rights defenders from speaking about specific industries. Where such situations arise, be ready to use company leverage with governments to advance human rights. (See 3.3 Proactive Government & State Engagement for more)

3. Strengthen Accountability by Building Enforceability and Applying Coherence

- **Enforce Accountability Through Company Policy:** A policy is only as strong as its implementation and enforcement. Clearly state the consequences for breaking a zero-tolerance policy or other infractions at both global and local levels, including in policy documents and contracts, covering employees, suppliers, and business partners. A zero-tolerance stance should apply to all forms of attacks, regardless of their origin (e.g., state-sponsored, online, etc.).
- **Align Complaint Mechanisms:** Ensure policies facilitate the alignment of local-level complaint mechanisms with global-level systems to guarantee consistency in how grievances are handled. Ensure that there are confidential and anonymous ways to submit complaints with safeguards built in, and align grievance mechanisms with UNGP effectiveness criteria.
- **Mainstream Defender Support:** Acknowledge the work and role of human rights defenders in other corporate policies, such as climate, land, and labor commitments, to ensure consistency across the business and amongst suppliers. Raise awareness and socialise about the policy commitment and ensure training for implementation.

PART ONE:

1.2 HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE

Robust due diligence is the foundational, ongoing process that enables a company to proactively identify, prevent, mitigate, and account for its human and environmental rights impacts. It moves a company from a state of passive commitment to one of proactive, informed risk management. This is not a one-time assessment but a continuous, iterative cycle. This involves anchoring in global frameworks, integrating due diligence into all business practices alongside the whole supply chain, making deep collaboration with stakeholders non-negotiable, applying a heightened, context-specific lens to high-risk areas, addressing sector-specific challenges, and adopting an intersectional approach to address community-specific needs. Key learnings from discussions between business and human rights defenders include:

1. Anchor in Global Frameworks

- **Implement Key International Standards:** Base your due diligence process on established international standards, such as the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Working Group Guidance, the OECD Due Diligence Guidelines (especially in conflict or high-risk contexts), CEDAW, UNDRIP and the EU's Anti-SLAPPs Directive.
- **Acknowledge and Navigate Gaps:** When using standards like the OECD Guidelines, be mindful of their gaps (e.g., verify mentions of climate change or HRDs where relevant) and consider the risks of problematic text (e.g., "undue pressure").
- **Use UNGPs as a Universal Tool:** Apply the UNGPs as a starting point for all business risks, including those posed by technology.

2. Integrate Due Diligence into all Business Practices

- **Build Internal Capacity:** Provide practical guidance and training to all employees and contractors on their human rights responsibilities.
- **Create Robust Management Systems:** Implement progressive policies, management systems, and guidance (e.g., the UN Guidance on Business and Human Rights Defenders) to create a strong internal framework.
- **Incorporate the Right to a Healthy Environment:** Treat the right to a clean, healthy, and sustainable environment as a standard and non-negotiable part of your due diligence framework.
- **Conduct Environmental and Human Rights Impact Assessments (HRIAs):** Conduct impact assessments to identify action gaps and develop practical sub-guidance.
- **Broaden the Risk Assessment Lens:** Include analyses of the risks to human rights defenders and civic society space, and the differentiated risks to defenders depending on their identities, as indicators within human rights risk assessments.
- **Verify Safety Nets:** Conduct due diligence to ensure worker protections are effective in practice – such as verifying if state aid reaches suspended workers in your supply chain – and act to close gaps where they fail.

- **Embed Intersectionality & Equity:**
  - **Integrate, Don't Separate:** Ensure that assessments for Indigenous Peoples, women, Afro-descendants, and other marginalized groups are incorporated internally into the company's core risk assessments. Apply an intersectional lens to understand how risks compound, ensuring a consistent and robust standard of protection across all operations.
  - **Advance Systemic Equity:** Acknowledge the need for collaboration across sectors, and with governments to advance racial and systemic equity.
  - **Use Standard Frameworks:** Use existing HREDD, including the UNGPs, as a primary framework to advance this work and ensure consistency.
- **Move Beyond Risk-Mitigation:** Work to proactively add value to the communities in which you operate, building shared resilience. Ensure these efforts are co-created with rights-holders, respecting Free, Prior, and Informed Consent (FPIC) as the foundation for sustainable development.
- **Prepare for Urgency:** Balance the need for speed with qualitative engagement by investing in preparation. Dedicate resources, build relationships with national organizations before market entry, and allow adequate time for initial processes to enable efficiency later. Establishing processes to bring in the right people quickly and maintaining awareness of global trends are key to responding effectively to urgent situations.
- **Be Willing to Stop:** Where a community does not wish for a project to proceed, be honest, open, and willing to advocate for a halt.

3. Make Collaboration and Engagement Non-Negotiable

- **Engage local Civil Society and HRDs as Strategic Allies:** View local and national-level human rights defenders (and civil society organisations like BHRC, ISHR, Access Now, Rainforest Action Network etc.) as essential allies in conducting due diligence. Such actors are well-placed to raise early alarms about local context and are important partners throughout the business lifecycle for identifying impacts, especially when entering new contracts or operating environments. Actively cooperate with local civil society and human rights defenders (and trusted proxies where appropriate) to gain comprehensive situational awareness. Engage HRDs, communities and civil society meaningfully to create connections, especially in countries where dialogue is difficult. Where possible, leverage existing networks, such as business partners already operating in the country or community.
- **Do No Harm in Engagement:** While collaboration is essential, it must be context-sensitive. Assess the risks that company actions, including public statements, declarations, or visible meetings, might pose to human rights defenders. Adjust your positioning and modes of engagement based on the specific security context to ensure you do not inadvertently increase their vulnerability.
- **Empower Workers:** Commit to effective and transparent due diligence through the meaningful participation of workers at all levels (national, supplier, and project). This involves identifying and assessing environmental, social, and human rights impacts and risks in operations, value chains, and business relationships collaboratively**,** rather than treating workers solely as sources of data.
- **Partner with Communities and HRDs as Part of Your Due Diligence:** Commit to effective and transparent due diligence through the ongoing dialogue and participation of affected communities. Engage them to identify and assess environmental, social, and human rights impacts and risks in operations, value chains, and business relationships together, ensuring their lived experience shapes the assessment.

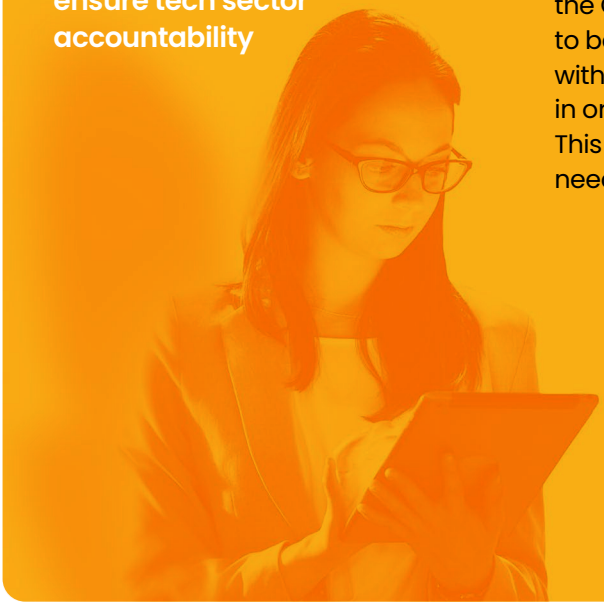
1.2

- **Collaborate with Peers, Across Industries and with Civil Society:** Share knowledge and practical learnings across the business community and with civil society partners. Cooperate with other companies, including on collaborative risk assessments. Engage in cross-industry conversations, at least until standardization bodies have matured regarding human rights issues.
- **Engage Your Supply Chain:** Leverage good practices with all direct and indirect suppliers. This includes building relationships early, even before contracts are signed, developing monitoring and transparency mechanisms early, requiring transparency around financial, human rights and environmental information, encouraging civil society participation and collaborating with existing initiatives, and showing up to national dialogues (such as tripartite dialogues or government-facilitated stakeholder engagement) to remain informed and connected before issues arise.
- **Advocate for the Strongest Standards to Anticipate Future Changes:** Use your company's influence to advocate for the strongest possible regulations in your jurisdiction, for example continued reinforcement of the EU's CSDDD.

Spotlight | Corporate Action

75+

organisations call on EU policy makers to strengthen draft CSDDD to ensure tech sector accountability



In 2022, businesses and civil society organizations joined forces to advocate for the strengthening of technology sector accountability in the EU's Corporate Sustainability Due Diligence Directive (CSDDD). Specifically, it advocated for the inclusion of the technology sector in the list of "high-impact sectors". The adoption of the CSDDD required significant compromise to be adopted, eventually passing in 2024 without a "high-impact sectors" approach, in order to simplify compliance burdens. This underscores why strong positions are needed, to hold the line.

1.2

4. Apply a Heightened, Context-Specific Lens

- **Heighten Diligence in Conflict-Affected Areas:** Implement and maintain heightened human rights due diligence standards in conflict-affected zones, high-risk and other vulnerable areas. This must be an integrated part of all company decision-making in these contexts.
- **Integrate Conflict Analysis:** Ensure conflict analysis is a core part of your activities. You must act on the findings of this analysis to avoid contributing to or profiting from human rights violations.
- **Understand Legal and Criminal Liability:** Recognize that under international law, corporate officials can be complicit or held criminally and civilly, and administratively liable for their acts or omissions. Doing business with those that command and coordinate repression against the civil population is unacceptable and carries plausible legal risk.
- **Report Transparently on Conflict & High-Risk Contexts:** Conduct and transparently report on enhanced due diligence. Show the concrete steps you are taking to balance commercial relationships with your human rights obligations.
- **Assess All Business Relationships and Disengagement Options:** Continuously consider the human rights impacts of your business partners, services, and the evolving geopolitical context. If mitigation is not feasible or impacts are too severe (for example, in situations where international crimes or human rights violations are being committed), responsible disengagement (from suppliers, clients, or entire markets) may be the only option, balanced against the need to minimise harm during exit.
- **Prioritize Leverage Before Termination:** Treat contract termination as a last resort. Instead, use leverage to help suppliers and customers comply with international standards through guidance, contractual requirements, and mediation. If contract termination becomes necessary, ensure all stakeholders understand the reasoning to facilitate learning.



1.2

Sector Spotlight | Technology

For technology companies, due diligence must address the high-velocity risks inherent in digital products and data management. This requires mandating continuous stakeholder engagement with technical experts, Human Rights Defenders (HRDs) and vulnerable or marginalized groups, as a non-optional element of the HREDD process. This engagement must align with UNGP minimum requirements, including participant protection and access to information.

To ensure meaningful stakeholder engagement, businesses should do preparatory work first, including by regular, detailed mapping of stakeholders and developing a system to identify opportunities for engagement with civil society. They should not assume civil society is ready to engage; and be ready to address any engagement fatigue. Additionally, they should create channels to gather feedback on the process of engagement itself.

Beyond engagement, firms should apply an **intersectional and gender lens** to examine how specific technologies – such as AI, 5G and biometrics – disproportionately impact marginalized populations, while contextually evaluating government data requests. To ensure long-term accountability, companies should implement **preventative systems**, such as robust contractual clauses and software restrictions, designed to forestall the misuse of technology for surveillance or the targeting of those protecting civic freedoms.

All companies, especially technology firms and others with strong industry associations, have a collective power to speak out on governance and human rights issues.



PART ONE:

1.3 IMPLEMENTATION IN PRACTICE

Effective due diligence is not a theoretical or a check list exercise; it must inform practical and continuous implementation of due diligence measures. This is the critical stage of translating policies and risk assessments into concrete, operational actions that embeds respect for human rights into the core of the business decision making. It requires moving beyond written statements to develop detailed internal guidance and standard operating procedures, building specific tools for engagement, and maintaining a constant, proactive focus on protecting those most at risk, such as human rights defenders (HRDs). Key learnings from discussions between business and human rights defenders include:

1. Translate Policy into Action

- **Move Beyond Statements:** Human rights policies must be translated into detailed, practical internal guidance for all staff levels and fully integrated into core management systems.
- **Strengthen and Follow-up on Policy Commitments:** Policies must be robust and specific, including commitments to Indigenous Peoples' right to self-determination, and participation, and upholding Free, Prior, and Informed Consent (FPIC), with clear governance for how FPIC is implemented across projects and regionally. For example, investors could set a clear red line that if there is no FPIC, there is no finance for a project.
- **Map Internal Dynamics:** Companies should continuously map all relevant stakeholders, including internal power dynamics. While especially critical during the integration of new entities, this ongoing mapping is essential to ensure policies are implemented effectively across the business at all times.
- **Set Clear and Traceable Human Rights Requirements:** Move from loose *expectations* to clear and traceable *requirements and responsibilities* for all employees, contractors, subsidiaries, and suppliers. Embed these requirements and responsibilities directly into contracts and monitor compliance.
- **Close Information Gaps:** Actively plug information gaps between functions (e.g., legal, public affairs, and human rights teams) and between headquarters and on-the-ground teams. Establish clear communication processes for when risks are identified by a function that lacks control over the solution. Crucially, ensure regular information flow from regional/national government affairs teams to human rights teams to provide updated country risk mappings and insights on local enforcement issues, and ensure headquarters maintains real-time awareness of local ground realities to effectively mitigate risks.
- **Monitor for Legislative Red Flags:** Recognizing that an open civic space is the essential enabling environment for engagement, and as part of a continuous due diligence process, develop internal indicators to raise immediate alerts for company attention, such as the introduction of national laws that prohibit human rights defenders from speaking about specific industries.

2. Bridge Global-Local Policy Gaps

- **Collaborate and Verify:** Enact a global zero tolerance policy for reprisals against human rights defenders, and implement it through headquarters collaboration with country managers and local partners to translate rules into local practice. Verify the work of subsidiaries and local partners to ensure alignment.
- **Build Capacity:** Invest in training and awareness to build understanding of global-level policy amongst country managers and subsidiaries. The goal is to remove any fear or concerns about engaging at the local and regional level. Even if challenges surface, it is better to address them than leave them unmanaged.
- **Hire for Engagement:** Reflect the need for engagement skills in job descriptions. Hire regional or local managers who already understand the importance of stakeholder engagement and are committed to doing it.

3. Cultivate Internal Culture and Awareness

- **Reduce Distance to Impact:** Close the gap between human rights teams and real-world impacts. Ensure teams have adequate capacity to engage with defenders, invite HRDs to company events, and ensure frontline colleagues are upskilled for defender engagement, including overcoming language barriers. Maintain open, long-term lines of communication around projects.
- **Build Ownership:** Human rights responsibilities should be owned by all teams, with champions in every department. Encourage cross-functional collaboration, such as having human rights colleagues review climate policies with a social lens, or finding common ground in sectors like agriculture.
- **Tell the Story:** Use internal communications and storytelling about ongoing efforts to support human rights defenders, to build internal awareness and buy-in, which can eventually contribute to resource allocation. Consider making support for human rights defenders and civic space part of the brand identity.
- **Create Practical Tools:** Establish collaborative internal working groups (e.g., on Just Transition) to develop clear definitions and practical elements that can be integrated into daily work.
- **Foster Connection:** Use tools like global staff showcases, product-related funding models, or local charity events to connect staff with the issues. Give defenders a visible platform via in-store visuals or website campaigns.
- **Prioritize Relationships:** Recognize that deep relationships with colleagues and partners are foundational to all collaborations and work.



PART ONE:

1.3 4. Develop Practical Guidance & Tools

- **Adopt and Implement Public Policy Commitments:** Recognise the valuable role of HRDs, reference specific risks to HRDs, ensure effective engagement and consultation with HRDs at all stages of the due diligence process, and commit to zero-tolerance for reprisals throughout the company's operations, supply chains and business relationships.
- **Accompany Policy Commitments by Implementation Guidance and Plans:** Do so in line with the UN Working Group on Business and Human Rights guidance, and civil society advice on appropriate indicators to monitor progress.
- **Establish Robust Internal Governance:** Ensure that your company has adequate internal governance mechanisms in place to support implementation of the human rights defender policy commitment, including board-level oversight and senior management involvement.
- **Present Guidance Clearly and Unambiguously to All Levels of the Business:** Ensure that practical guidelines can be easily understood and efficiently implemented by all across your company.
- **Disclose to Nurture Future Engagement:** Comprehensively disclose the actions taken by the company as a result of stakeholder engagement. This disclosure loop helps build trust for future engagement and contributes to engagement as a continuous process.

Spotlight | Indigenous Peoples: Implementation Shifts

Indigenous Peoples possess unique collective rights to self-determination and ancestral lands, often guaranteed through treaties, national jurisdictions, and international frameworks. To move from high-level policy to credible action, organizations must navigate these three operational shifts:

- **From Surface-Level Policy to Independent Verification:** Do not rely on state-provided maps which may overlook contested or ancestral territories and would overlook the effect of company actions on external parties. Credible action requires primary, community-verified mapping to identify all affected rights-holders and boundaries independently.
- **From Siloed to Intersectional Integration:** Move beyond "standalone" social reports. Risk models must be hard-coded into core business assessments, specifically examining how land and cultural impacts disproportionately compound for Indigenous women and marginalized subgroups.
- **From Advisory to Authoritative FPIC:** Treat Free, Prior, and Informed Consent (FPIC) as a "hard" governance requirement. Policy is only credible if internal structures empower a "no-go" decision – or a "no-finance" red line – when consent is absent or withdrawn.

2

PART TWO



BOARD GOVERNANCE AND LEADERSHIP

This section details the formal mandates, board oversight, executive education, and top-down responsibilities required to drive internal accountability and enable meaningful leadership dialogue with affected stakeholders.

KEY ACTIONS AT A GLANCE

1. **Establish Formal Oversight Mandates:** Formally assign board responsibility for human rights and environmental oversight, policy approval, regular review of salient risks, and transparent reporting.
2. **Drive C-Suite Operational Accountability:** Hold executive leadership accountable for cascading strategies, managing escalation channels, and securing adequate resources.
3. **Foster Direct Engagement & Education:** Invest in leadership education and scenario testing, while enabling direct, unmediated dialogue between leadership and affected frontline stakeholders.

PART TWO:

2 BOARD GOVERNANCE OF HUMAN RIGHTS AND THE RIGHT TO A HEALTHY ENVIRONMENT

2.1

Effective governance is the engine of corporate responsibility, and this begins with the board. To secure accountability and resource allocation for the effective implementation of a company's human rights policy, sustained commitment and strategic oversight must be driven from the top. Active board engagement positions human rights not as a compliance risk, but as a core element of long-term business resilience and value. This requires moving beyond high-level policies to ensure that oversight is informed, respectful of regional and cultural sensitivities, empowered, and directly engaged with the company's real-world impacts – and that this accountability is transparently communicated to the wider world. Key learnings from discussions between business and human rights defenders include:

1. Establish a Formal Mandate for Oversight

- **Assign Clear Responsibility:** Formally assign board-level responsibility for overseeing the company's respect for human and environmental rights.
- **Approve and Review:** Ensure the board approves all core human and environmental rights policies. This body should also regularly review salient rights abuse allegations, due diligence plans, and the outcomes of any remedy provided.
- **Secure Accountability & Resources:** Use this governance mandate to hold the C-suite accountable for performance and the allocation of adequate resources for human rights functions within the company.
- **Advance Transparency:** Ensure that the mandate includes an element of public reporting.

2. Foster Direct Board Engagement and Education

- **Engage Affected Groups:** Signal a true level of seriousness by ensuring board members and executive leadership are well-briefed and have robust, direct conversations with stakeholders, including affected and marginalized groups.
- **Invest in Education:** Implement board education, scenario testing, and engagement with on-the-ground issues to make the business case for human rights tangible.

PART TWO:

2.2 EXECUTIVE LEADERSHIP & C-SUITE RESPONSIBILITIES

Executive leadership plays an indispensable operational role in bridging board-level oversight and on-the-ground action. To ensure corporate human rights commitments are successfully embedded throughout daily operations, executive and senior management should focus on the following key responsibilities:

1. Cascade Board Directives into Enterprise Strategy and Operations

- **Translate Oversight into Execution:** Operationalize board directives by translating high-level governance mandates into actionable, enterprise-wide strategies, operational targets, and team-level metrics across all divisions.
- **Set Clear & Enforceable Requirements:** Move from loose corporate expectations to explicit, traceable requirements and responsibilities for all internal teams, subsidiaries, and supply chain partners.
- **Managing Internal Risk Escalation:** Establish clear communication channels to ensure that when human rights risks are identified by specialized teams, they are immediately escalated to functions with the direct operational control needed to resolve them.

2. Executive Sponsorship & Formal Policy Approval

- **Senior Management Sponsorship:** Require explicit C-suite approval, sponsorship, and endorsement of zero-tolerance policies against reprisals and SLAPPs (Strategic Lawsuits Against Public Participation), signaling unequivocal top-down commitment across all subsidiaries and partners.
- **Recognize Liability Risks:** Maintain explicit executive awareness that corporate officials face potential criminal, civil, and administrative liability under international law for direct acts, omissions, or complicity in human rights violations, particularly when operating alongside repressive state forces in conflict or high-risk zones.

3. Leverage External Audits and Regulatory Driver for Priorities and Resources

- **Elevate Priority & Resources:** Utilize independent external audits and regulatory compliance frameworks to elevate human rights issues on executive agendas, providing the necessary leverage to secure operational budgets and build required capacity.

3

PART THREE



EXTERNAL ENGAGEMENT

This part outlines how to scale and secure the impact of your internal work. It involves leveraging your company's position to engage with investors, governments, consumers and peers to enable open civic space and engagement, to strengthen respect for the rights of defenders, and to respect human rights at local, national or international levels. This approach begins on the frontlines and extends to influencing the systemic levers of Investors and Governments, and culminates in Cross-Sector Collaboration to drive collective impact.

KEY ACTIONS AT A GLANCE

1. **Enable Meaningful Stakeholder Dialogue:** Build proactive, two-way relationships with human rights defenders and affected communities, addressing power imbalances and embedding feedback into corporate decisions.
2. **Influence Systemic Levers (Investors & Governments):** Meet evolving investor expectations through transparent risk reporting, and advocate for an enabling regulatory environment that protects civic space and the rule of law.
3. **Mobilize Ecosystem Collaboration:** Partner across industries, civil society, trade unions, and peer networks to harness collective leverage against systemic human rights risks and retaliatory pressures.

PART THREE:

3 MEANINGFUL STAKEHOLDER ENGAGEMENT

3.1

Credible action cannot be designed in a vacuum. Meaningful stakeholder engagement is the non-negotiable process of proactive, two-way dialogue with potentially affected and affected groups - and is a part of business responsibility to respect human rights under the UNGPs. It requires parties to listen to and learn from each other, an openness to recognize uncomfortable truths and a willingness to adapt behaviour for a positive outcome. It is not a sequential step but a continuous and essential practice that must be integrated into all stages of a company's human rights work. Stakeholder Engagement is a core component of due diligence itself, a critical guide for implementation, and the foundational tool for building trust, identifying risks, and designing solutions that are both effective and legitimate. It is not just a compliance obligation, but a strategic investment in long-term business resilience. This section outlines the principles, internal systems, prioritization strategies, and practical mechanisms required to move from one-off consultation to a genuine, ongoing dialogue. Key learnings from discussions between business and human rights defenders include:

1. Adopt Guiding Principles for Engagement

- **Communicate Proactively:** Provide stakeholders, including human rights defenders, with information on what will affect them *before* problems arise, rather than communicating only in response to crises.
- **Acknowledge Legitimacy:** Openly acknowledge role and value of human rights defenders. Validating their contribution can make future engagements more effective and productive.
- **Recognise and Remunerate Expertise:** Recognise the experience and expertise of human rights defenders and remunerate them appropriately for their time and inputs. The inputs of HRDs can enable companies to operate more sustainably and profitably, and consultations should be compensated commensurate to any expert business consultant.
- **Address Power Imbalances:** Acknowledge the inherent power asymmetry between the company and local defenders. Mitigate this by providing safe spaces for dialogue, consider hiring a neutral facilitator, ensuring engagement terms (including language and imagery) are mutually agreed upon at the outset, and offering capacity support (including financial support and financial compensation for time and expertise) to enable meaningful participation.
- **Integrate Feedback into Decisions:** Ensure that the opinions and feedback from stakeholders are demonstrably taken into account and integrated back into company policies and decisions.
- **Make Engagement an Ongoing Process:** Move beyond one-off requests to sustained engagement. This should include an ongoing and comprehensive audit and review process that starts early, and continues through all stages of due diligence.

- **Build Two-Way, Trusting Relationships:** Frame engagement as a long-term, two-way relationship, not just a consultation. Build trust by investing in relationships *before* an issue arises, and maintaining consistent, good-faith feedback loops.
- **Be Transparent to be Accountable:** Ensure multi-directional transparency about processes between the business and the government, as well as, between business and the community. Be clear about the engagement process, how input will be used, and what is or isn't possible. Share outcomes, even if stakeholder requests were not met, and provide insight as to why. Greater levels of disclosure and proactive information sharing will help bring all stakeholders closer together.
- **Embrace Difficult Conversations:** Have difficult, open discussions to ensure stakeholders feel heard, accounted for, and bought in. Consider the intersectionalities of stakeholders, respect local customs and diverse perspectives, and recognize that consent is an ongoing process that may need to be renegotiated.
- **Ask, Don't Assume:** Speak directly with civil society to understand what information they need and what their desired end results are. Specifically, discuss the primary value-adds of the feedback loop, particularly when engagement is early and not product-specific.
- **Don't Rush the Process:** Meaningful stakeholder engagement can take time and companies should invest adequate time (and resources) to get it right.

2. Build Internal Capacity and Alignment

- **Map Internal Governance:** Understand and map the internal governance structures and communication flows that determine how human rights issues are handled within the company, as this is just as important as the external engagement process.
- **Ensure Institutional Memory:** Maintain historical continuity of relationships during staff turnover. Keep records of past actions and engagements with defenders to ensure fluid engagement isn't lost when staff leave.
- **Make Commitments Public:** Ensure corporate commitments are public so that all stakeholders, including internal colleagues, have visibility and a shared understanding.
- **Ensure Policy Consistency:** Apply consistent human rights standards internationally, as complying with domestic law is often insufficient to fully protect people.
- **Be Transparent on Lobbying:** Publicly disclose all lobbying activities and trade association affiliations to provide accountability and ensure messaging on a certain company position is aligned across all conversations.
- **Build Internal Buy-In:** Use external pressure, independent audits or evaluations, or regulation to elevate the importance of human rights to company executives and unlock necessary resources.
- **Proactively Invest in Internal Capacity:** Companies should hire expert staff proactively rather than reactively, such as when new legal requirements need to be met. Hire more regional staff who are closer to the situation on the ground but remain connected to headquarters. This should be combined with broad internal training for all colleagues (especially in teams like compliance) on how to escalate issues; and to develop a shared operational language.

PART THREE:

3.1

3. Prioritize and Plan Engagement

- **Establish Direct Relationships:** Do not rely solely on government facilitation or information sharing. Build relationships with affected stakeholders and defenders directly, and ensure these relationships are in place *before* issues occur.
- **Prioritize the Most Marginalized:** Prioritize engagement with people most at risk of harm or who have previously experienced harm.
- **Engage Regularly:** Conduct stakeholder engagement with potentially affected groups and human rights defenders throughout the process including when identifying impacts, when developing a prevention plan, and when developing a corrective action plan.
- **Be Specific and Context-Driven:** Make engagement regional and thematic-specific based on the product or service. Prioritize human rights defenders who are also de-facto rightholders and groups with specialized expertise (e.g., on encryption or a specific culture).
- **Plan and Resource Engagement:** Invest time and dedicated resources in project planning for qualitative engagement. This includes advance learning about stakeholders, their context, and potential long-term impacts, as well as building local talent and relationships.
- **Apply a Gender Lens:** Conduct an analysis of gender imbalances among affected stakeholders at the outset to reduce the risk of conflict and exclusion later on.

4. Strengthen Mechanisms for Engagement

- **Use Engagement for Effective Due Diligence:** Recognize that stakeholder engagement is an opportunity to conduct due diligence, which benefits all parties in terms of resource usage and relationship-building.
- **Enable Community Monitoring:** Build and use community monitoring tools to ensure that evidence of on-the-ground impacts is correctly gathered and transmitted to the company.
- **Be Transparent:** Be open with product impact assessments, but be more cautious with country-level risk assessments, which can be seen as political. Focus on discussing safeguards rather than broad country risk, and use existing, credible third-party country reports.
- **Establish Accessible Grievance Mechanisms:** Ensure a grievance mechanism is in place that is publicly accessible, is clearly intended for use in human rights cases as well as whistleblowing, and which provides rapid response, high levels of security, and protection for users. Proactively nurtured relationships with affected stakeholders including labour representatives and the local community can help to establish initial trust in the grievance mechanism and process. Additionally, align local-level complaint mechanisms with global-level systems to ensure consistency.
- **Strive for Scale:** Work towards building a process for meaningful stakeholder engagement at scale.

PART THREE:

3.1

Spotlight | Environmental Human Rights Defenders

"A 'just transition' requires not just new technology, but a new social contract that respects the rights of those on the frontlines of resource extraction."

Environmental protection and human rights are a critically important intersection. This reality is now legally reinforced by UN General Assembly and Human Rights Council resolutions recognizing the universal human right to a clean, healthy, and sustainable environment. For business, this recognition elevates environmental harm from a technical compliance issue to a fundamental human rights risk, signaling a clear trajectory toward stricter legal accountability. Environmental Human Rights Defenders (EHRDs) – including land and Indigenous defenders – are essential stakeholders in a just transition, but they are also among the most vulnerable to attack. We must ensure the transition to a green economy does not replicate the abuses of the past. A 'just transition' requires not just new technology, but a new social contract that respects the rights of those on the frontlines of resource extraction. Credible corporate action requires a specific, robust, and proactive strategy to engage with these defenders, protect their rights, and integrate environmental protection into all assessments and grievance processes.This includes addressing the underlying allegations that defenders are raising concerns about.

PART THREE:

3.2 ENGAGING INVESTORS ON CIVIC FREEDOMS AND HUMAN RIGHTS DEFENDERS

Investor expectations have evolved, and abstract statements about human rights are not sufficient to fulfil established expectations. Today's responsible investors are digging deeper and relying less on third-party ESG ratings, which often fail to capture real-world social impacts. They expect companies to demonstrate a sophisticated, tailored, and proactive understanding of their specific human rights risks and to provide transparent evidence of how those risks are being managed, from the supply chain to the grievance mechanism. Key learnings from discussions between business and human rights defenders include:

1. Move Beyond Tick-box Compliance

- **Provide Tailored and Transparent Analysis:** Investors are unsatisfied with surface-level conversations about the UNGPs or static policies. They expect a nuanced understanding of the specific human rights risks tied to your products, services, and operational contexts.
- **Demonstrate Situational Awareness:** In conflict-affected areas, show what concrete steps you are taking to assess conflict dynamics, prevent and mitigate risks to employees, communities and facilities and contribute to peacebuilding efforts.
- **Go Beyond Legal Minimums:** Demonstrate that your due diligence is not just sanctions compliance. Show that you understand that responsible entry into a market begins at the first step of a project.

2. Scrutinize Business Partners & Remedy

- **Proactive KYC:** Investors want to know who you do business with. Demonstrate preventive, know-your-customer (KYC) due diligence, especially in conflict-affected and high-risk contexts where salient human rights risks translate to financially material risks.
- **Showcase Remedy Mechanisms:** Be prepared to discuss your policy for public access to remedy and how stakeholders – including adversely impacted individuals – are engaged during these practices.
- **Report on Engagement Outcomes:** Transparently detail how stakeholders are engaged in your processes, the regularity and security of that engagement, the actions or decisions coming out of that engagement and how you report publicly on the outcomes.

3. Align Internal Teams for Investor Dialogue

- **Support Investee Action:** Financial institutions themselves should withhold investment where impact assessments reveal serious threats to civic freedoms and defenders. Financial institutions should develop guidelines that reprisals against defenders will not be tolerated. Investors should also have a policy commitment on protecting human rights defenders.
- **Educate investees:** Transparent feedback on activities financed by the institutions is an important part of improving the impacts of development efforts.
- **Partner Internally:** Identify and partner with key internal colleagues, such as the legal and media teams, to ensure that investor-facing communications about human rights are accurate and aligned with on-the-ground remedy processes.

PART THREE:

3.3 PROACTIVE GOVERNMENT & STATE ENGAGEMENT

While states have the primary duty to protect human rights, companies have a critical and proactive role to play, including a responsibility to respect human rights and those who defend them. This responsibility is not absolved by a lack of government leadership, nor by purported compliance with national laws or policies that are inconsistent with international human rights standards. Businesses should engage with governments to advocate for an enabling environment that protects civic space and the rule of law, while also championing the specific rights of affected stakeholders in their operations and value chains. This engagement should reiterate the connection between predictable and stable policy and operating environments, reliable and prosperous markets and enable long-term value creation. It must be transparent and carefully managed to avoid corporate capture, ensuring it serves the public good. Silence is no longer a neutral stance; in the face of closing civic space, it often signals complicity. Companies must move along the spectrum of action – from simply 'doing no harm' to proactively advocating for the open societies they need to thrive. Key learnings from discussions between business and human rights defenders include:

1. Understand the Political & Social Landscape

- **Conduct Power Mapping:** As a first step, conduct a "power mapping" to understand the dynamics of all stakeholders involved in any engagement.
- **Engage Directly:** Use this understanding to engage directly with the community. Direct engagement can reduce tensions and improve planning by clarifying the needs and aspirations of affected stakeholders.

2. Advocate for an "Enabling Environment"

- **Inform Regulation:** Provide constructive, evidence-based input to governments to help create regulations that are both practicable and efficient in protecting rights.
- **Prioritize Community Agency:** Advocate for engagement processes that are initiated by affected parties, as this is the safest approach. Consider identifying local champions and providing funding in cases of need. Crucially, push governments to provide the capacity support needed to make this leadership possible, ensuring the burden does not fall solely on communities.
- **Address Systemic Risks:** Encourage State efforts to understand and counteract systemic issues like the daily survival pressures that are particularly faced in vulnerable areas and contexts.
- **Use Leverage Responsibly to Advance Human Rights:** Use company and investor leverage to engage with home and host governments with care and humility, on both broad legislation and specific human rights cases. Use this influence with intention, transparency and balance to advocate for the safety of HRDs, the protection of shared civic space and to promote best practices that benefit the public good, while proactively safeguarding the space for diverse stakeholders to meaningfully contribute.

- **Advocate for Rights-Based Protections:** Directly encourage governments to adopt and enforce laws that mandate Free, Prior, and Informed Consent (FPIC) for Indigenous Peoples, recognizing that clear consent frameworks create a more stable and predictable environment for business.
- **Advocate for International Guidelines:** Directly encourage governments to develop internationally-harmonized guidelines to address systemic vulnerabilities faced by human rights defenders. This would also benefit the wider population.
- **Use Leverage in Specific Cases of Attacks on Human Rights Defenders:** Advocate directly with government officials on individual cases of threats or retaliation, and demonstrate active support – such as sending company representatives to bear witness at human rights defenders' trials.

3. Uphold Corporate Responsibility, Even in a Vacuum

- **Do Not Wait for Government:** A lack of government leadership does not absolve a company from taking steps to enhance its own due diligence and plan for future supply chain diversification.
- **Engage Third Governments:** When a host government is failing, engage with third-party governments to highlight the need for action and diplomacy.

4. Advocate to Governments for the Rights of Affected Stakeholders

- **Ensure Decent Work:** Provide decent work opportunities in pre-, post-, and in-transition contexts, to support the well-being of society, especially in the context of a just transition.
- **Protect Indigenous Rights:** Respect Indigenous Peoples' rights, lands, and resources. Commit to obtaining FPIC *before* investment or operational decisions are made, and co-own outcomes through shared asset models. Ensure communities and workers are well-advised for equal negotiation of these terms, and that these processes are accessible, culturally appropriate, safe and effective.
- **Ensure Supply Chain Transparency:** Develop mechanisms for transparent communication with communities about impacts on labour and the environment.
- **Respect the Rights of Human Rights Defenders (HRDs):** Be vocal in support of the rights of HRDs. Implement and publish a zero-tolerance policy for threats or violence against human rights defenders. Require it of your suppliers, and act swiftly to remedy abuses from any party.



PART THREE:

3.4 COLLABORATION AND COOPERATION ACROSS YOUR ECOSYSTEM

Leverage is multiplied when shared, increasing impact to protect civic freedoms and HRDs. Because no single company can solve systemic human rights issues alone, credible action requires building broad coalitions – collaborating with peer companies, industry bodies, trade unions, and civil society to establish higher standards, demonstrate collective norms, and advocate for reform in the most complex environments. Key learnings from discussions between business and human rights defenders include:

1. Use Collective Leverage in High-Risk Sectors

- **Strengthen Sector-Specific Impact Assessments (HRIAs):** Companies in high-risk sectors, such as surveillance and security, must conduct strengthened environmental impact assessments and human rights impact assessments. This must involve early engagement with civil society and experts on specific contexts and nuances relating to the country of operations.
- **Use Sectoral Leverage:** All companies, especially technology firms and others with strong industry associations, should use their collective power to speak out on governance and human rights issues.
- **Develop Collective Standards:** Work with peers to establish a collective, industry-based approach and set of common standards.

2. Partner with Civil Society and Labor

- **Engage Specific Coalitions:** In all sectors, actively engage and consult with expert civil society groups and, where relevant, affected diaspora communities.
- **Collaborate with Trade Unions:** Work directly with trade unions and other worker groups to ensure Freedom of Association (FOA) is a core part of your human rights due diligence.

3. Advocate for Systemic Protections

- **Take Collective Policy Positions:** Use your collective voice to communicate to host governments that strong protections for civil rights, human rights, and Freedom of Association are essential for a stable and predictable business environment. This includes protecting the most vulnerable workers and can include support of defenders experiencing attacks.

CONCLUSION

Business resilience and long term value creation are inextricably linked to the health of the societies in which businesses operate. Protecting human rights defenders and upholding open civic space are not merely risk mitigation strategies; they are foundational to safeguarding the rule of law and ensuring predictable, prosperous markets.

Effective corporate engagement with human rights defenders (HRDs) requires moving beyond policy commitments towards practical implementation. Companies must establish clear guidance, assign internal responsibility, and equip field teams to engage meaningfully with defenders. These learnings are just the starting point in helping companies understand the importance of and benefits from engagement with affected stakeholders - and in particular defenders.

As demonstrated in this publication, effective implementation requires many elements, including setting expectations for their supply chain, requiring stronger governance, and ensuring that boards and executive leadership take direct responsibility for the treatment of HRDs and the protection of civic space. Externally, companies should build lasting relationships with civil society, report transparently and continuously on engagement, support civic space through responsible policy engagement, and collaborate where relevant across industry to amplify collective influence.

Ultimately, trust is built through proactive and sustained dialogue, genuine listening, and consistent follow-through, not isolated initiatives or pure reactivity. Meaningful and safe engagement with HRDs enables companies to identify emerging risks, prevent conflict, and contribute to a more stable operating environment. The challenge is to translate commitments into practice and recognize that protecting civic space is not only a human rights responsibility, but also an essential component of responsible and resilient business conduct.

By standing with civil society and nurturing trust as a key asset, business leaders can build resilient organizations capable of navigating complexity and fostering a just, sustainable global economy.



KEY RESOURCES

- Guiding Principles on Business and Human Rights (United Nations, 2011)
- Guiding Principles on Business and Human Rights: guidance on ensuring respect for human rights defenders (United Nations, 2021)
  - Executive Summary (United Nations, 2021)
- Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD, 2023)
- Indicators on how to track businesses' respect of the rights of human rights defenders (International Service for Human Rights, 2024)
- Protecting journalists and human rights defenders from strategic lawsuits against public participation (SLAPPs) (EU Directive, 2024)
- Business Frameworks and Actions to Support Human Rights Defenders: a Retrospective and Recommendations (Business & Human Rights Centre and International Service for Human Rights, 2025)
- Latest briefings and reports on human rights defenders and business (Business & Human Rights Centre, on-going)
- Tracking Civic Space (CIVICUS Monitor, on-going)
- Zero Tolerance Resource Hub (Zero Tolerance Initiative, on-going)

KEY REGIONAL AND INTERNATIONAL POLICY

- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979/Entered into force 1981)
- Aarhus Convention & Rapid Response Mechanism for EHRDs (UNECE, 1998/2021)
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007)
- Escazú Agreement (2018/Entered into Force 2021)
- IFC Performance Standards (PS1 & PS7) & IFC Position Statement on Reprisals (2018/2021)
- Human Rights Defenders Protection Act of 2024, S.3705, 118th Cong. (2023-2024)
- EU Corporate Sustainability Due Diligence Directive (CSDDD/CS3D, 2024)

ABBREVIATIONS

- **Aarhus Convention:** United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters
- **BHRC:** Business & Human Rights Centre (previously known as the Business & Human Rights Resource Centre)
- **CSDDD:** Corporate Sustainability Due Diligence Directive
- **EHRDs:** Environmental Human Rights Defenders
- **ESG:** Environmental, Social, and Governance
- **EU:** European Union
- **FOA:** Freedom of Association
- **FPIC:** Free, Prior, and Informed Consent
- **HRDs:** Human Rights Defenders
- **HREDD:** Human Rights and Environmental Due Diligence
- **HRIA:** Human Rights Impact Assessment
- **OECD:** Organisation for Economic Co-operation and Development
- **SLAPPs:** Strategic Lawsuits Against Public Participation
- **UNGPs:** United Nations Guiding Principles on Business and Human Rights

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BUSINESS NETWORK ON CIVIC FREEDOMS & HUMAN RIGHTS DEFENDERS