

UN GUIDING PRINCIPLES

REPORTING / FRAMEWORK

Assurance of Human Rights Performance and Reporting

ASSURANCE INDICATORS

This part of the guidance is designed as a practical tool to help practitioners identify the relevant types of evidence for assuring a company's human rights performance or reporting.

The indicators here are referenced in the document 'UN Guiding Principles Reporting Framework — Guidance Part II: Assurance of Human Rights Performance and Reporting,' and this introductory text is repeated in that document. That document is available at www.ungpreporting.org/assurance.

SECTION A sets out three factors that define the structure and content of the indicators and which should inform their use.

SECTION B provides further implementation guidance. This includes guidance specific, on the one hand, to internal auditors and expert assessors looking at a company's human rights performance, and, on the other hand, to external assurance providers looking at a company's disclosures in relation to its human rights performance.

A STRUCTURE AND CONTENT OF THE INDICATORS

1. SEQUENCE OF INDICATORS

The sequence of the indicators follows the logic of the three parts of the Reporting Framework:

Part A: Governance of respect for human rights

Part B: Defining the focus of reporting (that is, the company's salient human rights issues)

Part C: Management of salient human rights issues

- Sections A and C each contain a small number of overarching questions with further supporting questions, while section B solicits four key assertions regarding the focus of a company's reporting, which should also mirror the focus of its human rights risk management processes.
- Indicators are labelled first of all by the question in each part of the Reporting Framework to which they most closely relate (A1, A1.1, A1.2, A2, A2.1, A2.2 etc.).
- Since most questions have more than one indicator, the label then adds a lower-case letter so that it can be uniquely identified (A2.2/a, A2.2/b etc.).
- While questions in the Reporting Framework refer to the 'reporting period', that language is adjusted here to refer to the 'period covered by the assurance', recognizing that for internal audit and expert assessments, other time frames may be relevant.

2. APPROPRIATENESS AND EFFECTIVENESS INDICATORS

The indicators were developed so as to cover both:

- A. the appropriateness of policies and/or processes, and
 - B. the effectiveness of policies and/or processes
- While most appropriateness indicators have an equivalent effectiveness indicator, this is not always the case. For example, effectiveness indicators for a company's public

commitment to respect human rights are, in practice, the indicators that relate to various processes, behaviours and outcomes.

- The label for each indicator ends with an 'APP' or 'EFF' to show which type of indicator it is (A2.2/a – APP, A2.2/a – EFF etc.).

Indicators of the appropriateness of policies and processes focus on evidence of whether they *in principle* should contribute to helping the company meet its responsibility to respect human rights, including whether:

- they are suitable for the size and human rights risk profile of the company
- they are designed to be able to meet their objective
- they can be understood and implemented by those to whom they apply

Indicators of the effectiveness of the policies and processes focus on evidence of whether they *in practice* have contributed to helping the company meet its responsibility to respect human rights, including whether:

- there is evidence that they have achieved their objective in practice
- there is evidence that they have helped mitigate risks to human rights and/or address actual impacts

3. INDICATOR TIERS

The indicators are presented in three tiers, as a practical guide for practitioners and companies looking at the resources likely to be demanded for the assurance process. In practice, the resources needed for certain indicators may vary also by sector and context, such that these divisions need not be regarded as rigid but as a guideline. The tiers are defined as follows:

- **Tier one:** This information can be readily assured based on written information available through the company or bilateral interviews with internal staff; or it is foundational to any

human rights assurance process (notably, an assessment of the appropriateness of the salient/priority human rights issues identified by the company).

- **Tier two:** This information requires more extensive research or interviews with internal staff and/or an increased level of professional judgment; or it requires a limited number of external interviews on a foundational issue for human rights assurance (notably regarding perceptions of the appropriateness of the human rights issues identified as salient/priorities).
- **Tier three:** This information requires more complex research, and/or a high level of professional judgment, and/or broader engagement with external stakeholders.

The tiers are designed to be used cumulatively. That is, tier two assurance would entail the examination of evidence against indicators in both tier one and tier two; tier three assurance would entail the examination of evidence against indicators in all three tiers. In some instances, a tier three or tier two indicator does not have a direct equivalent in the lower tier(s) given the particular resource challenges of assuring that aspect of the company's human rights performance. However, the section within which it appears (e.g., A2, C3 or C6) will have lower-tier indicators that should be addressed to provide the more basic assurance on that general area of the company's performance.

The tiers are intended solely to help expert practitioners and companies requesting their services to identify the likely levels of resource required to assure aspects of their human rights performance or reporting. They recognize that the level of resources required will often determine the ability or readiness of a company to pursue that assurance. The tiers should not be viewed as:

- A. representing what aspects of human rights risk and impact management it is easier or harder for the company to implement: the focus here is on the level of effort and the resources required by the expert practitioner and, while there may be some overlap, this is by no means always the case, or
- B. representing the steps companies might begin with or introduce later in a process to implement the UN Guiding Principles: there are many possible starting points for implementation, which may be equally appropriate or necessary
- C. determining exactly which indicators the expert practitioner will need to cover to reach the confidence level required for a 'limited'/'moderate' or 'reasonable'/'high' level of assurance; this will be situation-specific and necessarily part of the professional judgment of the practitioner

B GUIDANCE ON IMPLEMENTATION OF THE INDICATORS

1. GENERAL GUIDANCE

Practitioners can also refer to the ‘UN Guiding Principles Reporting Framework – Guidance Part I: Strengthening Human Rights Reporting and Performance’ (‘implementation guidance’) to see, for each question, which excerpts from the UN Guiding Principles on Business and Human Rights are relevant in terms of defining the global normative standard and the objective towards which the company should be working.

Practical guidance is provided to the assurance practitioner in relation to many of the indicators that are not self-explanatory or where further background may be useful. This can be found in the digital formats of the indicators, but not in the print-ready format. They take three forms:

- **Notes:** providing clarification on how a particular term or provision should be understood in relation to the UN Guiding Principles on Business and Human Rights, or offering examples by way of further explanation.
- **Cross-references:** showing where an indicator in one part of the guidance relates to an indicator in another part of the guidance. Care has been taken to avoid duplication across indicators, which means that distinct aspects of the same or similar issues may be addressed at different points in the list of indicators.
- **Citations:** where relevant, excerpts from ‘The Corporate Responsibility to Respect Human Rights: An Interpretive Guide’, issued by the Office of the UN High Commissioner for Human Rights, are included to provide further clarification.¹

A small number of indicators are highlighted as being solely relevant for external assurance, for instance, when considering the appropriateness of examples selected by the company for inclusion in its public reporting.

2. SPECIFIC GUIDANCE FOR INTERNAL AUDITORS AND EXPERT ASSESSORS

The indicators are designed to cover, in a comprehensive manner, the general types of policy, process or practice that can be important for a company to implement respect for human rights in line with the UN Guiding Principles.

An internal audit or expert assessment process may have a specific scope that means some of the indicators are not relevant. For example, the engagement may focus on how well the company is addressing forced labour in its supply chain, in which case indicators about how human rights risks are assessed and prioritized are not relevant.

The expert practitioner can, therefore, draw from the indicators as is appropriate to the scope of the engagement. This does not diminish the importance of reviewing whether the scope of the engagement may be inappropriate if it excludes issues or activities that would result in its conclusions being misleading. For more on limitations on the scope of an engagement, see Part II, Section C of this guidance.

3. SPECIFIC GUIDANCE FOR EXTERNAL ASSURANCE PROVIDERS

External assurance practitioners will be focusing, by the nature of their engagement, on information that a company has disclosed in its public reporting. This will often not include all the general types of policy, process and practice covered by the indicators.

The indicators should, therefore, be read by external assurance providers as being relevant:

- a. to the extent that the company reports information pertaining to the policy/process or practice that is the subject of the indicator
- b. to the extent that the disclosure does not make clear that the conditions set out in the indicator are not, in fact, met

The UN Guiding Principles Reporting Framework asks companies to identify their salient human rights issues: those human rights at risk of the most severe negative impacts through their activities and business relationships. This reflects the UN Guiding Principles, which make clear that these are the risks that companies should address first when they face a need to prioritize

Assurance providers will need to:

- review the extent to which the human rights risks identified as the focus of the company’s reporting can reasonably be concluded to be its salient human rights risks
- identify whether any human rights risks that would appear to be salient are not reported, and whether this omission means that the reporting is not a fair and balanced representation of the company’s human rights performance
- identify whether any severe impacts on human rights have occurred (within or beyond the salient issues) that are not adequately reflected in the reporting, and assess whether their omission is justified (See Principle G of the UN Guiding Principles Reporting Framework), or would mean that the reporting is not a fair and balanced representation of the company’s human rights performance
- use the indicators to assure the information reported on the human rights issues selected by the company, regardless of their salience

To view the indicators, continue to the next page.

¹ See http://www.ohchr.org/Documents/Publications/HR.PUB.12.2_En.pdf

A. GOVERNANCE OF RESPECT FOR HUMAN RIGHTS

A.1: What does the company say publicly about its commitment to respect human rights?

TIER ONE ASSURANCE		TIER TWO ASSURANCE	TIER THREE ASSURANCE
AI/a – APP	The public commitment reflects an understanding that human rights are not discretionary but an entitlement of all people, set out in internationally recognized human rights standards.	–	–
AI/b – APP	The public commitment does not explicitly exclude any internationally recognized human rights from its coverage.	–	–
AI/c – APP	The public commitment sets out that it applies across the company’s own operations and its business relationships.	–	–
AI/d – APP	The public commitment does not limit the company’s recognition of human rights to the provisions of national law or wider industry practice where these are weaker than the international standards.	–	–
AI/e – APP	The public commitment reflects an understanding that certain human rights are particularly salient for the company.	–	–
AI/f – APP	The public commitment sets out what person/function and/or governance body is accountable for its dissemination and implementation.	–	–

A1.1: How has the public commitment been developed?

TIER ONE ASSURANCE		TIER TWO ASSURANCE	TIER THREE ASSURANCE
–		AI.1/a – APP There is evidence that the development/review of the public commitment was informed by: <ul style="list-style-type: none"> • an understanding of leading practice within the company’s sector • insights into the perspectives of individuals or groups who are at risk of impact from the company’s activities or through its business relationships • the involvement of relevant experts inside and/or outside the company • feedback from stakeholders outside the company • active engagement by senior management and the Board 	–
AI.1/b – APP	There is evidence that the public commitment is kept under review to identify any updates that may be necessary over time.	AI.1/b – EFF There is evidence that the public commitment is updated where necessary to reflect significant human rights developments relevant to the company’s operations and value chain.	–

A1.2 Whose human rights does the public commitment address?

TIER ONE ASSURANCE		TIER TWO ASSURANCE	TIER THREE ASSURANCE
AI.2/a – APP	The public commitment does not exclude, or imply the exclusion of, any groups who could be affected by the company’s operations or value chain.	–	–

A1.3 How is the public commitment disseminated?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–		A1.3/a – APP	The means through which the public commitment is disseminated is likely to be effective in gaining the attention and understanding of: <ul style="list-style-type: none"> • those individuals or groups inside the company who need to implement it • those individuals or groups outside the company who need to implement it • those individuals or groups inside and outside the company whose rights the public commitment addresses 	–	
		A1.3/a – EFF	There is evidence that the public commitment is known and understood by: <ul style="list-style-type: none"> • those individuals or groups inside the company who need to implement it 		

A2: How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–		A2/a – APP	The company's business model and strategy do not, by their essential nature, pose significant risk to people's human rights.	A2/a – EFF	There is evidence that any inherent tensions between respect for human rights and the company's business model or strategy are: <ul style="list-style-type: none"> • being addressed systematically, with a view to ensuring respect for human rights
		A2/a – EFF	There is evidence that any inherent tensions between respect for human rights and the company's business model or strategy are: <ul style="list-style-type: none"> • recognized explicitly by the company 		
		A2/b – APP	There is evidence that top managers regularly affirm the company's commitment to respect human rights: <ul style="list-style-type: none"> • publicly • in interactions with staff • in their decision-making processes 	A2/b – EFF	There is evidence: <ul style="list-style-type: none"> • that staff and key external stakeholders are aware of the views of top management regarding the company's commitment to respect human rights • that staff and key external stakeholders find these views to be consistent with other explicit or implicit messages communicated by top management
A2/c – APP	Those individuals within the company, or contracted by the company, with a mandate to conduct lobbying on behalf of the company, are aware of the company's public human rights commitment and the constraints it would place on lobbying activities.	–		A2/c – EFF	There is no evidence of the company actively lobbying against measures by governments and regulators that would protect human rights.
–		A2/d – APP	There is evidence that the company makes sure that business associations of which it is a member, and which represent members' views in interactions with governments or regulators, are aware of its commitment to respect human rights.	–	

		A2/d - EFF	Where a business association of which the company is a member is known by the company to have lobbied against measures by governments or regulators that would protect human rights, or is on public record for doing so, there is evidence that the company has publicly distanced itself from such lobbying.		–
		A2/e – APP	The competence and seniority of personnel (including any external service providers) who work routinely on human rights-related issues is adequate for the levels of risk to human rights associated with the company’s business and value chain.	A2/e – EFF	There is evidence that human rights impacts identified are dealt with in a timely fashion, having regard to the severity of the issue.
A2/g – APP	Performance incentives for senior managers related to human rights: <ul style="list-style-type: none"> • reflect the company’s salient human rights issues and/or the most significant human rights risks related to each individual’s responsibilities • are supported by relevant KPIs for assessing how well the issues are managed 				–
A2/g – EFF	There is evidence that performance incentives for senior managers related to human rights: <ul style="list-style-type: none"> • are given reasonable weight in relevant compensation schemes or other reward systems to which they apply 	A2/g – EFF	There is evidence that performance incentives for senior managers related to human rights: <ul style="list-style-type: none"> • positively influence the awareness and decisions of senior managers in relation to ensuring respect for human rights 		–
A2/h – APP	If the company has a risk management system: <ul style="list-style-type: none"> • human rights are included within that system • human rights risks are addressed from the perspective of risk to people, not just risk to the business 				–
A2/h – EFF	If the company has a risk management system, there is evidence that: <ul style="list-style-type: none"> • the system captures the most severe potential impacts on human rights and includes them in priorities for action • the highest severity impacts on human rights are captured and prioritized even when their likelihood is low 				–
A2/I – APP	If the company is a member of any industry or multi-stakeholder initiative that has a focus on human rights issues, the standards espoused by the initiative are recognized by experts as being in line with international human rights standards.				–
A2/I – EFF	If the company is a member of any industry or multi-stakeholder initiative that has a focus on human rights issues, the company can identify how that membership helps advance its ability to respect human rights.	A2/I – EFF	If the company is a member of any industry or multi-stakeholder initiative that has a focus on human rights issues, there is evidence that membership has contributed positively to the company’s ability to respect human rights in practice.		–

A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
A2.1/a – APP	The function in which the company has located lead responsibility for human rights performance is well positioned to help embed respect for human rights across the company’s operations and value chain.	A2.1/a – EFF	There is evidence that the function in which the company has located lead responsibility for human rights performance has, in practice, helped the company to prevent or effectively mitigate its salient human rights risks.	–	
A2.1/b – APP	There is evidence that the most senior person with accountability for human rights issues: <ul style="list-style-type: none"> • has a say in business decisions that are likely to have significant human rights implications • is able to engage with managers in all parts of the business where human rights are most likely arise • has access to the Board and senior management, when necessary, on significant human rights issues 	A2.1/b – EFF	There is evidence that the most senior person with accountability for human rights issues: <ul style="list-style-type: none"> • is known by managers in all parts of the business where human rights risks are most likely to arise • has engaged with managers in those parts of the business where human rights risks are most likely to arise 	A2.1/b – APP	There is evidence that the most senior person with accountability for human rights issues: <ul style="list-style-type: none"> • has been able to influence business decisions and actions that have significant human rights implications
A2.1/c – APP	Any formal structure(s) (such as cross-functional committees) with a mandate to address human rights risks: <ul style="list-style-type: none"> • include representatives of those functions, departments or business units most relevant for addressing the human rights risks concerned • have access, to the greatest extent possible, to the internal information necessary to understand and address the human rights risks concerned 	A2.1/c – EFF	There is evidence that any formal structure(s) (such as cross-functional committees) with a mandate to address human rights risks, has, in practice, influenced the decisions and actions of the company in ways that reduce those risks.	–	

A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
A2.2/a – APP	Discussions among senior management and the Board on human rights issues have centred on the company’s salient human rights issues, significant new or evolving human rights risks, and any severe impacts that have occurred.	–		–	
A2.2/a – EFF	Any significant new or evolving human rights risks or severe impacts that have occurred in the period under assessment: <ul style="list-style-type: none"> • have been discussed by senior management and the Board 	A2.2/a – EFF	Any significant new or evolving human rights risks or severe impacts that have occurred in the period under assessment: <ul style="list-style-type: none"> • have been addressed in a manner designed to support respect for human rights by the company • have had appropriate follow-up action to monitor results 	–	
A2.2/b – APP	There are processes through which people can raise concerns about internal pressures to act contrary to the company’s responsibility to respect human rights, and which: <ul style="list-style-type: none"> • are open to all employees and contract workers • are accessible in the languages spoken by employees and contract workers • do not limit the type of human rights issue that can be addressed • provide for confidentiality and non-retaliation • offer clarity on how concerns will be addressed • enable the issues to be escalated to senior management and, where appropriate, the Board 	A2.2/b – EFF	There is evidence that any processes through which people can raise concerns about internal pressures to act contrary to the company’s responsibility to respect human rights: <ul style="list-style-type: none"> • are known to employees and contract workers • are viewed by employees and contract workers as processes they would feel confident in using 	A2.2/b – EFF	There is evidence that any processes through which people can raise concerns about internal pressures to act contrary to the company’s responsibility to respect human rights: <ul style="list-style-type: none"> • have led to concerns being addressed in a manner that supports respect for human rights

A2.3: How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
A2.3/a – APP	The company provides employees and contractors whose actions or decisions affect human rights risks with operating procedures or other guidance on how to address those risks, which is: <ul style="list-style-type: none"> • clear and understandable to non-experts in human rights • appropriate to the functions or roles of the target audience • aligned with international human rights standards 	A2.3/a – EFF	There is evidence that employees and contractors whose actions and decisions can affect human rights risks: <ul style="list-style-type: none"> • understand the guidance or operating procedures and its significance for implementing the company’s human rights commitment • understand the importance for the business of implementing the company’s human rights commitment • feel equipped to implement the guidance or operating procedures 	–	
A2.3/b – APP	Human rights-related training and updates are: <ul style="list-style-type: none"> • provided, at a minimum, to employees and contractors whose work regularly involves actions or decisions with human rights implications • tailored, as necessary, to recipients’ functions • aligned with good human rights practice • designed to help recipients understand how to respond when issues arise 	A2.3/b – EFF	There is evidence that employees and contractors who have received training and/or updates on human rights-related issues: <ul style="list-style-type: none"> • have understood what the substance of the training or updates was about • have understood the relevance of the training or updates to their own work • feel equipped to implement what they have learned 	–	
A2.3/c – APP	Guidance is available to employees and contractors on what to do when they identify tensions between respect for human rights and other performance requirements.	A2.3/c – EFF	There is evidence that when employees or contractors perceive a tension between respect for human rights and other performance requirements: <ul style="list-style-type: none"> • they either know how to resolve the tension appropriately, or know where to take the issue for further guidance 	A2.3/c – EFF	There is evidence that when employees or contractors perceive a tension between respect for human rights and other performance requirements: <ul style="list-style-type: none"> • such tensions have, in practice, been raised and addressed at an appropriate level within the company
A2.3/d – APP	Performance incentives related to human rights risk management: <ul style="list-style-type: none"> • are part of evaluations for those employees or contract workers who have lead responsibility within the company for human rights-related issues • are part of evaluations for those employees or contract workers whose work regularly involves actions or decisions with human rights implications • reflect the company’s salient human rights issues and/or the most significant human rights risks related to the individual’s responsibilities • include KPIs for assessing how well the relevant issues are managed 	–		–	
A2.3/d – EFF	There is evidence that human rights-related performance incentives for employees or contract workers: <ul style="list-style-type: none"> • are given reasonable weight in relevant compensation schemes or other reward systems to which they apply 	A2.3/d – EFF	There is evidence that human rights-related performance incentives for employees or contract workers: <ul style="list-style-type: none"> • positively influence the awareness and decisions of employees and contractors in relation to human rights risks 	–	

A2.4: How does the company make clear in its business relationships the importance it places on respect for human rights?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
A2.4/a – APP	The company articulates clearly in written communications to business partners: <ul style="list-style-type: none"> • its own commitment and policies regarding respect for human rights • any particular expectations it has of its business partners with regard to meeting this commitment 		–	A2.4/a – EFF	There is evidence that the company’s business partners whose own activities pose the greatest risk to human rights: <ul style="list-style-type: none"> • are aware of the company’s policies or other expectations of them regarding respect for human rights • understand what these policies or expectations mean for them in practice • believe that the company is sincere in its human rights policies and expectations
A2.4/b – APP	The company has systems to screen the partners with which it does business that are based on human rights-related criteria and which: <ul style="list-style-type: none"> • consider all human rights • assess the capacity and intention of the partners to act with respect for human rights 	A2.4/b – APP	The company has systems to screen the partners with which it does business that are based on human rights-related criteria and which: <ul style="list-style-type: none"> • where necessary, prioritize for assessment those business relationships where the risk to human rights is significant 		–
A2.4/b – EFF	There is evidence that any systems through which the company screens the partners with which it does business, based on human rights-related criteria: <ul style="list-style-type: none"> • inform decisions on who the company will do business with • inform decisions on the terms on which the company does business with those partners • inform the provision of capacity-building or other forms of engagement with partners to address gaps or weaknesses 		–		–
A2.4/c – APP	There is evidence that the company endeavours to include, in new or renewed contracts with business partners, human rights provisions that: <ul style="list-style-type: none"> • are aligned with international human rights standards 	A2.4/c – APP	There is evidence that the company endeavours to include in new or renewed contracts with business partners human rights provisions that: <ul style="list-style-type: none"> • encompass all human rights or at least those that might reasonably be judged to be at risk in the context of the relevant type of business relationship 		–
A2.4/c – EFF	There is evidence that the company secures human rights provisions in new or renewed contracts with business partners where human rights risks are identified or known to be likely, and that it does so: <ul style="list-style-type: none"> • as a matter of routine where this is largely within the control of the company 	A2.4/c – EFF	There is evidence that the company secures human rights provisions in new or renewed contracts with business partners where human rights risks are identified or known to be likely, and that it does so: <ul style="list-style-type: none"> • in a reasonable proportion of contracts that are subject to negotiation and where the company’s control of the terms is limited 		–
A2.4/d – APP	There is evidence that the company monitors whether business partners adhere to human rights provisions in contracts.	A2.4/d – EFF	The company’s efforts to monitor implementation of human rights provisions in its contracts with business partners show that these terms are typically adhered to.		–
	–	A2.4/e – APP	There is evidence that the company takes care to ensure that the terms it demands of business partners do not themselves make it challenging for those partners to respect human rights.	A2.4/e – EFF	There is no evidence that the company has imposed terms on a business partner that have reduced its ability to respect human rights.

A2.5: What lessons has the company learned during the period under assessment about achieving respect for human rights, and what has changed as a result?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
A2.5/a – APP	<p>The company has formal processes through which it identifies lessons in managing human rights risks and impacts, which are designed to:</p> <ul style="list-style-type: none"> • look for both successes that can be replicated and failures that need to be addressed • involve the internal and/or external stakeholders necessary to adequately understand the lessons • enable the company to identify underlying factors in the success/failure, as far as possible • support learning across the company as a whole 	A2.5/a – EFF	<p>There is evidence that any processes through which the company has identified lessons in managing human rights risks and impacts:</p> <ul style="list-style-type: none"> • have been triggered where significant human rights risks or severe impacts have arisen in relation to the company's operations or supply chain • have also enabled successes to be identified • where relevant, have identified lessons within the company's broader industry or operating environment • have led to the dissemination of lessons to relevant employees, contract workers, and external parties 	A2.5/a – EFF	<p>There is evidence that any processes through which the company has identified lessons in managing human rights risks and impacts:</p> <ul style="list-style-type: none"> • have involved people with relevant information and varying perspectives in assessing the lessons • have enabled insight into underlying factors for the success/failure • have led to appropriate changes to policies, processes or practices where lessons learned indicate that this is necessary to avoid future human rights harm

B. DEFINING THE FOCUS OF REPORTING

BI: Statement of salient issues

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
BI/a – APP	The salient issues identified by the company include issues one would expect to see based on the company's sector.		–		–
BI/b – APP	The salient issues identified by the company include issues one would expect to see based on the geographies where the company operates or which are critical to the life cycle of its products.		–		–
BI/c – APP	The salient issues identified by the company include issues one would expect to see based on the main types of business relationship on which the company depends.		–		–
BI/d – APP	The salient issues identified by the company include issues one would expect to see based on the company's business model and strategy.		–		–
BI/e – APP	The salient issues identified by the company include issues one would expect to see based on human rights challenges the company has faced in the recent past.		–		–
BI/f – APP	Where issues one would expect to see included in the salient issues are absent, the company has a reasonable explanation.		–		–
BI/g – APP	Where issues one would not expect to see included in the salient issues are present, the company has a reasonable explanation.		–		–

B2: Determination of salient Issues

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE
B2/a – APP	There is evidence that the company understands salient human rights issues to be those human rights at risk of the most severe negative impact through its activities and business relationships.	B2/g – APP	There is evidence that the company’s process to identify its salient human rights issues has taken into account the perspectives of stakeholders who may be impacted, drawing on insights gained from engagement with those stakeholders, their legitimate representatives and/or others who have expert knowledge of their perspectives.	–
B2/b – APP	There is evidence that the company understands the ‘severity’ of human rights impacts to comprise: <ul style="list-style-type: none"> • how grave the impact would be • how widespread the impact would be • how hard it would be to put right the resulting harm 	B2/h – APP	There is evidence that the company’s process to identify its salient human rights issues has looked at both severe impacts on human rights that it could cause or contribute to, and also severe impacts that may be linked to its operations, products or services without contribution on its part.	
		B2/i – APP	There is evidence that the company’s process to identify its salient human rights issues has given appropriate weight to particularly high severity impacts, even if their likelihood is relatively low.	
		B2/a–k – EFF	There is evidence that informed external stakeholders find the identified salient human rights issues credible given the company’s sector and their knowledge of its activities and business relationships. AND There is no significant public media or other reporting that would suggest salient human rights issues have been omitted. AND There is no other evidence of severe human rights impacts or risks that are not covered by the salient human rights issues identified. <i>The effectiveness of how the company’s salient human rights issues are determined (B2) is partly reflected in the appropriateness of the outcome under B1. The appropriateness indicators in B1 can, therefore, also be seen as effectiveness indicators for B2.</i>	
B2/c – APP	There is evidence that the company has conducted a clear and deliberate process to identify its salient human rights issues, or has drawn on a range of relevant existing processes to do so.			
B2/d – APP	There is evidence that the company has looked both at its own operations and at its value chain to identify its salient human rights issues.			
B2/e – APP	There is evidence that the company has drawn on internal expertise and experience from across the company, and where appropriate on external expertise, to identify its salient human rights issues.			
B2/f – APP	There is evidence that the company’s process to identify its salient human rights issues has considered the various groups of stakeholders that could be impacted.			
B2/j – APP	There is evidence that the company has tested its conclusions regarding its salient human rights issues with key external stakeholders, particularly those who have knowledge of both the business or industry and human rights.			
B2/k – APP	There is evidence that senior management and the Board signed off on the selection of the salient human rights issues after appropriate consideration of relevant issues.			

B3: Choice of focal geographies

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
B3/a – APP	If the company focuses its efforts to address human rights risks on a limited number of geographies, these are geographies where those risks are particularly significant.	–		–	
B3/b – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>If the company selected one or more focal geographies for its human rights reporting:</p> <ul style="list-style-type: none"> • the company conducted a clear process to arrive at its selection based on the time frame addressed in its reporting • senior management and the Board signed off on this selection 	B3/b – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>If the company selected one or more focal geographies for its human rights reporting:</p> <ul style="list-style-type: none"> • the company drew on internal expertise and experience from all relevant parts of the company, and any necessary external expertise, in making this selection 	B3/b–c – EFF	<p>[Relevant for the assurance of human rights reporting]</p> <p>There is evidence that informed external stakeholders find the company's selection of focal geographies for reporting:</p> <ul style="list-style-type: none"> • to be reasonable as a reflection of locations where the company's salient human rights issues are particularly significant • to be otherwise justified based on an explanation provided
B3/c – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>Where focal geographies are not those where the issue(s) being reported are particularly significant, this is made clear and there is a credible alternative explanation for their selection.</p>	–		–	

B4: Additional severe impacts

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
<p>Note</p> <p>The practitioner should seek to identify any severe impacts that have occurred during the period under assessment, which are known to the company or its key stakeholders or are otherwise in the public domain, and should assess how they are being addressed in line with indicators under sections C4, C5 and C6 below.</p> <p>Cross reference</p> <p>C3.2 also addresses actual impacts, with a focus on any severe impacts associated with one or more of the company's salient human rights issues. This section looks at impacts that occurred outside of the company's salient human rights issues.</p>					
–		B4/a – APP	In the event that severe impacts on human rights occurred in the period under assessment, which were not related to the company's salient human rights issues, there is evidence that the company has considered whether it should revise its list of salient issues accordingly.	–	
–		B4/a – EFF	In the event that any severe impacts occurred in the period under assessment that indicate additional human rights issues should be identified as salient, the company has updated its risk assessments accordingly.	–	
B4/b – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>Any known severe human rights impacts with which the company has been involved, but which are unrelated to its salient human rights issues, have been clearly disclosed, or, where this is not the case, the company has provided a credible explanation for their omission.</p>	–		–	

B4/c – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>The company has provided information on:</p> <ul style="list-style-type: none"> • the nature and extent of the impact(s) • how it was involved with the impact(s), including whether it caused, contributed to or was simply linked to the impact(s) • its immediate response to the impact(s), once identified • steps the company took to provide or support the provision of remedy to those impacted (if it caused or contributed to the impact) • efforts the company made to ensure that the impact(s) could not continue or recur 	–	–
B4/b-c – EFF	<p>[Relevant for the assurance of human rights reporting]</p> <p>To the extent the company reports on its response to the impact(s), this information reflects the relevant effectiveness indicators under sections:</p> <ul style="list-style-type: none"> • C3.2 (identification of the impact) • C4.3 (response to the impact) • C5 (effectiveness of the response), and • C6.5 (remedy provided to those harmed) of this guidance <p><i>Levels 1, 2 and 3 assurance are indicated in the relevant sections.</i></p>	–	–

C. MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES

CI: Does the company have any specific policies that address its salient human rights issues, and, if so, what are they?

	TIER ONE ASSURANCE	TIER TWO ASSURANCE	TIER THREE ASSURANCE
C.I/a – APP	<p>Any specific company policies related to a salient human rights issue:</p> <ul style="list-style-type: none"> • are aligned with the relevant international human rights standard(s) • do not limit the company’s recognition of human rights to the terms of national law or wider industry practice where these are weaker than the international standards • make clear whose human rights they refer to • do not lead to certain potentially affected groups being implicitly or explicitly excluded from a company’s commitment to respect a certain human right • make it clear who is expected to implement them • make it clear who has oversight of their implementation 	–	–

CI.I: How does the company make clear the relevance and significance of such policies to those who need to implement them?

	TIER ONE ASSURANCE	TIER TWO ASSURANCE	TIER THREE ASSURANCE
CI.I/a – APP	<p>Any specific policies related to a salient human rights issue:</p> <ul style="list-style-type: none"> • are available in the languages spoken by those people who need to implement them 	<p>CI.I/a – EFF</p> <p>Any specific policies related to a salient human rights issue:</p> <ul style="list-style-type: none"> • are brought to the attention of those people who need to implement them with sufficient regularity to maintain their awareness 	–

CI.1/b – APP	Specific policies related to a salient human rights issue are supported by training, procedural guidance or other appropriate tools for employees or contract workers who need to implement them.	CI.1/b – EFF	There is evidence that those individuals inside the company who need to implement a specific policy: <ul style="list-style-type: none"> • are aware of the policy • understand the policy • understand why the policy matters for the company • know how to implement the policy in their own work 	CI.1/b – EFF	There is evidence that those individuals inside the company who need to implement a specific policy: <ul style="list-style-type: none"> • have the necessary skills and capacity to implement the policy • have the necessary resources to implement the policy
	–		–	CI.1/c – APP	Specific policies related to a salient human rights issue are supported by any capacity-building necessary for business partners (such as suppliers) to implement them.
	–		–	CI.1/c – EFF	There is evidence that individuals or groups outside the company who need to implement the specific policy: <ul style="list-style-type: none"> • are aware of the policy • understand the policy • understand why the policy matters for the company • know how to implement the policy in their own work • have the necessary skills and capacity to implement the policy • have the necessary resources to implement the policy

C2: What is the company's approach to engagement with stakeholders in relation to each salient human rights issue?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C2/a – APP	Any policies, procedural guidance and/or practices governing engagement with stakeholders are aligned with international good practice.		–		–
C2/a – EFF	There is evidence that any policies, procedural guidance and/or practices governing engagement with stakeholders are: <ul style="list-style-type: none"> • known to those who need to implement them • understood by those who need to implement them 	C2/a – EFF	There is evidence that any policies, procedural guidance and/or practices governing engagement with stakeholders are: <ul style="list-style-type: none"> • put into practice by those who need to implement them 		–
C2/b – APP	Senior management and the Board can articulate: <ul style="list-style-type: none"> • the role and relevance of stakeholder engagement for the company • the stakeholders (at least, by category) that the company has prioritized for engagement in relation to human rights issues, and why • the principal views about the company's human rights performance held by stakeholders who follow human rights issues 		–		–
	–		–	C2/c – APP	There is evidence that employees or contract workers whose jobs include engagement on human rights-related issues with stakeholders, and in particular with potentially affected stakeholders and/or their legitimate representatives: <ul style="list-style-type: none"> • have the skills necessary to conduct these engagements in a culturally appropriate and respectful manner • have the skills necessary to achieve the objectives set for these engagements • to the extent that they may lack the necessary skills, receive appropriate training to address those gaps

C2/d – APP	There is evidence that any permanent or ad hoc stakeholder advisory groups the company has established, whose remit includes human rights-related issues, include a proportionate number of individuals with recognized human rights expertise, including expertise in the company’s salient human rights issues.		–		–
C2/d – EFF	There is evidence that any permanent or ad hoc stakeholder advisory groups the company has established, whose remit includes human rights-related issues: <ul style="list-style-type: none"> • have discussed human rights issues in practice 	C2/d – EFF	There is evidence that any permanent or ad hoc stakeholder advisory groups the company has established, whose remit includes human rights-related issues: <ul style="list-style-type: none"> • have provided insights to the company relevant to understanding and addressing human rights risks and impacts 	C2/d – EFF	There is evidence that any permanent or ad hoc stakeholder advisory groups the company has established, whose remit includes human rights-related issues: <ul style="list-style-type: none"> • have had an impact on the company’s human rights due diligence practices or outcomes

C2.1: How does the company identify which stakeholders to engage with in relation to each salient human rights issue, and when and how to do so?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C2.1/a – APP	The basis (policy, procedure or general practice) upon which the company identifies which stakeholders to engage with: <ul style="list-style-type: none"> • is designed to ensure that representatives of affected stakeholders speak with legitimacy for the individuals or groups concerned • does not exclude any stakeholder group that may be affected through the company’s operations or value chain • provides for the inclusion of stakeholders who are critical of the company 		–		–
C2.1/b – APP	The basis (policy, procedure or general practice) upon which the company decides when to engage with potentially affected stakeholders: <ul style="list-style-type: none"> • is not constrained to times when the company is required by a third party (e.g., a government or financier) to engage with these stakeholders • is not constrained to times when the company itself is interested in engagement for other reasons 		–	C2.1/b – EFF	There is evidence that stakeholders with which the company has engaged during the period under assessment consider that the company: <ul style="list-style-type: none"> • is sincere in its wish to engage with them • is responsive when they wish to initiate some engagement • engages with them in a way they find respectful • covers relevant issues and is open to their views and any concerns they raise • is responsive to their views and any concerns they raise
C2.1/c – APP	The basis (policy, procedure or general practice) upon which the company engages with stakeholders in relation to human rights issues: <ul style="list-style-type: none"> • reflects sensitivity as to who would be the most appropriate representatives of the company to engage with • reflects awareness of the need to adapt engagement to the language needs and cultural sensitivities of those being engaged • shows clarity regarding the nature and purpose of an engagement • requires that those engaged are informed about how the engagement has been taken into account in the company’s decisions and actions 		–		–

C2.2: During the period under assessment, which stakeholders has the company engaged with regarding its salient human rights issues, and why?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C2.2/a – APP	There is evidence that the company has engaged with key relevant stakeholders during the period under assessment: <ul style="list-style-type: none"> • in relation to risks to human rights associated with its business • with particular emphasis on its salient human rights issues 	C2.2/a – EFF	Where the company has not engaged during the period under assessment with key stakeholders known to be critical of the company's human rights performance: <ul style="list-style-type: none"> • there is evidence that the decision is reasonable 	C2.2/a – EFF	Where the company has not engaged during the period under assessment with key stakeholders known to be critical of the company's human rights performance: <ul style="list-style-type: none"> • there is no evidence that the decision undermines the company's understanding of its actual or potential human rights impacts

C2.3: During the period under assessment, how have the views of stakeholders influenced the company's understanding of each salient human rights issue and/or its approach to addressing it?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
	–	C2.3/a – APP	There is evidence that the views of stakeholders have been fed into the company's internal discussions and decision-making processes.		–
	–	C2.3/a – EFF	Where stakeholder feedback on significant human rights risks or impacts has not affected company decisions or actions: <ul style="list-style-type: none"> • the company can articulate a clear reason why this was the case 	C2.3/a – EFF	Where stakeholder feedback on significant human rights risks or impacts has not affected company decisions or actions: <ul style="list-style-type: none"> • the company's explanation is reasonable and compatible with respect for human rights
C2.3/b – APP	There is evidence that the company has informed stakeholders with which it has engaged during the period under assessment about whether and how their views have influenced the company's decisions or actions.		–	C2.3/b – EFF	There is evidence that stakeholders with which the company has engaged during the period under assessment: <ul style="list-style-type: none"> • have confidence that their feedback was fed into internal discussions and decision-making processes • know if their feedback influenced the company's decisions or actions • believe it would be worthwhile to engage with the company in the future

C3: How does the company identify any changes in the nature of each salient human rights issue over time?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
	–	C3/a – APP	The company has processes, indicators or other means through which it assesses how risks related to its salient human rights issues evolve over time, and which are capable of identifying significant changes in those risks.	C3/a – EFF	There is evidence that the company has identified significant changes in the nature of risks related to its salient human rights issues in a timely manner. AND There is no evidence that the company has failed to identify significant changes in the nature of risks related to its salient human rights issues in a timely manner within the period under assessment.

C3/b – APP	There is evidence that staff with lead responsibility for human rights risk management: <ul style="list-style-type: none"> • understand the distinction between causing a human rights impact, contributing to a human rights impact, and being linked to a human rights impact through a business relationship • review potential impacts to identify in which of these ways the company might be involved 	C3/b – EFF	There is evidence that the company accurately identifies the nature of its involvement in actual and potential human rights impacts.	–
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C3.1: During the period under assessment, were there any notable trends or patterns in impacts related to a salient human rights issue, and, if so, what were they?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–		C3.1/a – APP	The company has processes in place to assess trends and patterns in impacts, which are capable of reliably identifying and analysing relevant information.		
		C3.1/a – APP	There is evidence that trends and patterns in impacts identified by the company are based on information that is: <ul style="list-style-type: none"> • relevant • from credible sources • timely • sufficient for the conclusions being drawn 	–	
C3.1/a – APP	There is evidence that the company ensures that any significant trends and patterns in impacts that it identifies are shared with the relevant parts of management so as to inform decision-making and improve practices.		–	C3.1/a – EFF	There is evidence that trends and patterns shared with relevant parts of management have been factored into their decision-making.

C3.2 During the period under assessment, did any severe impacts occur that were related to a salient issue, and, if so, what were they?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
<p>Note The practitioner should seek to identify any severe impacts that have occurred during the period under assessment, which are known to the company or its key stakeholders or are otherwise in the public domain, and should assess how they are being addressed in line with indicators under sections C4, C5 and C6 below.</p> <p>Cross reference B4 also addresses actual impacts, with a focus on any severe impacts that occurred outside of the company’s salient human rights issues. This section looks at impacts associated with one or more of the company’s salient human rights issues.</p>					
–		C3.2/a – APP	[Relevant for the assurance of human rights reporting] If the company reports on how it has determined whether an impact is sufficiently severe to require disclosure, there is evidence that: <ul style="list-style-type: none"> • it has focused on the three factors of: <ul style="list-style-type: none"> o how grave the impact is (scale) o how widespread it is (scope) o how hard it is to put right the resulting harm (remediability) • it has focused primarily on the severity of the risk to people’s human rights rather than just the risk to the business 	–	

–	C3.2/b – APP	<p>[Relevant for the assurance of human rights reporting]</p> <p>If the company reports on the nature of its involvement with the severe impacts concerned, there is evidence that:</p> <ul style="list-style-type: none"> • the company has accurately understood the distinctions between whether it has caused an impact, contributed to an impact, or is simply linked to the impact through its operations, products or services, but without any contribution on its part • the company has accurately understood the nature of its responsibility in relation to the impact, based on whether it caused, contributed or is linked to the impact 	–
–	C3.2/a–b – EFF	<p>[Relevant for the assurance of human rights reporting]</p> <p>Any severe human rights impacts with which the company has been involved in relation to any of the salient human rights issues – and which are known or reasonably capable of being known by the company – have been clearly disclosed, or, if not disclosed, the company has provided a credible explanation for their omission.</p>	–

C4: How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–		C4/a – APP	<p>There is evidence that the individual or individuals within the company who have day-to-day responsibility and (where different) accountability for addressing human rights risks associated with a salient issue:</p> <ul style="list-style-type: none"> • have sufficient understanding of the issues in order to perform their role effectively • have sufficient resources to perform their role effectively • have sufficient influence/authority within the company to perform their role effectively 	C4/a – EFF	<p>There is evidence that the individual(s) within the company with day-to-day responsibility and (where different) accountability for addressing human rights risks associated with a salient issue has been effective in influencing the company's decisions and actions in this regard.</p>
C4/b – APP	The company has processes or established practices for identifying and addressing any conflicts that arise between respect for internationally recognized human rights and compliance with national law.	C4/b – EFF	<p>In identified instances of conflict between respect for internationally recognized human rights and compliance with national law, there is evidence that the company has sought to honour the principles of internationally recognized human rights to the greatest extent possible.</p>		–
–		C4/c – APP	<p>The process (or processes) through which the company takes decisions on how best to address human rights risks associated with a salient issue:</p> <ul style="list-style-type: none"> • is capable of leading to adequately informed decisions • is capable of leading to decisions that are compatible with respect for human rights • is designed so that decisions reached can be effectively enacted by the people responsible for their implementation 		–
–		C4/c – EFF	<p>There is evidence that once decisions are taken about how to address a human rights risk:</p> <ul style="list-style-type: none"> • these are effectively implemented • their implementation is monitored 	C4/c – EFF	<p>There is evidence that once decisions are taken about how to address a human rights risk:</p> <ul style="list-style-type: none"> • any lessons from the monitoring are used to improve processes and practices

C4.1: How are those parts of the company whose decisions and actions can affect the management of salient issues involved in finding and implementing solutions?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C4.1/a – APP	<p>There is evidence that those functions, departments or business units whose decisions or actions can affect risks to human rights are actively involved in discussions, including cross-functional discussions, of:</p> <ul style="list-style-type: none"> • the human rights risks concerned and the implications for their decisions or actions • ways they can avoid increasing, and to the extent possible reduce, risks to human rights through their decisions and actions 	C4.1/a – EFF	<p>There is evidence that those functions, departments or business units whose decisions or actions can affect risks to human rights have taken deliberate measures to avoid increasing risks to human rights and to reduce them as far as possible.</p>		–

C4.2: When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C4.2/a–b – APP	<p>The company has principles, policies or processes for:</p> <ul style="list-style-type: none"> • identifying tensions between the prevention/mitigation of severe human rights impacts and other business objectives • engaging the appropriate functions/departments/business units and levels of senior management in identifying solutions 	C4.2/a – EFF	<p>There is evidence that any principles, policies or processes for handling tensions between the prevention/mitigation of severe human rights impacts and other business objectives have:</p> <ul style="list-style-type: none"> • guided company decision-making processes • resulted in actions aimed at preventing or mitigating risks to human rights 	C4.2/a – EFF	<p>There is evidence that actions taken to prevent or mitigate risks to human rights are effective where there is tension with other business objectives.</p>
	–	C4.2/b – EFF	<p>Where a known tension between the prevention or mitigation of impacts and other business interests has not been resolved in a manner compatible with internationally recognized human rights standards, there is evidence that:</p> <ul style="list-style-type: none"> • the company has systematically considered the tension and how to address it • there are credible reasons for the course of action it adopted 	C4.2/b – EFF	<p>Where a known tension between the prevention or mitigation of impacts and other business interests has not been resolved in a manner compatible with internationally recognized human rights standards, there is evidence that:</p> <ul style="list-style-type: none"> • no severe impacts on human rights have resulted

C4.3: During the period under assessment, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C4.3/a – APP	<p>There is evidence that the company actively looks for ways to use its leverage to mitigate risks to human rights associated with its business relationships.</p>		–		–
C4.3/b – APP	<p>There is evidence that, where necessary, the company seeks ways to increase its leverage to mitigate risks to human rights associated with its business relationships and fully utilizes them.</p>		–		–
C4.3/a – EFF	<p>There is evidence that the company has exercised its leverage to mitigate risks to human rights associated with its business relationships.</p>		–		–

C4.3/b – EFF	In situations where the company’s leverage has failed, over a reasonable period of time, to mitigate severe risks to human rights associated with certain business relationships, there is evidence that: <ul style="list-style-type: none"> • the company has, wherever possible and compatible with human rights considerations, terminated those relationships • the Board and senior management have considered and approved the decision taken 	–	–	
–	C4.3/c – APP	There is evidence that actions taken by the company to prevent or mitigate severe impacts on human rights are capable of, and appropriate to, achieving this objective given resource limitations and other relevant constraints.	C4.3/c – EFF	There is evidence that actions taken by the company to prevent or mitigate severe impacts on human rights have achieved this objective to the extent possible within reasonable resource limitations and other relevant constraints.

C5: How does the company know if its efforts to address each salient human rights issue are effective in practice?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C5/b – APP	The company has relevant qualitative and/or quantitative indicators that it uses to assess how effectively it is addressing actual and potential human rights impacts, and which: <ul style="list-style-type: none"> • are capable of providing valid insights into how effectively the company is addressing human rights impacts • are capable of being reliably measured or assessed • are placed in context where this is necessary to interpret how effectively the company is addressing its human rights impacts • include indicators that reflect stakeholder perceptions 	C5/b – EFF	There is evidence that the company uses its indicators to track the effectiveness of its efforts to address actual and potential human rights impacts.	–	
–	C5/a – APP	The company has data-collection processes or other relevant practices in place to track whether its efforts to address actual and potential human rights impacts are effective in practice, and which: <ul style="list-style-type: none"> • are capable of assessing whether potential impacts on human rights have been prevented or mitigated • are capable of assessing whether actual impacts on human rights have been effectively remedied • are designed to take account of the perspectives of stakeholders who are or may be impacted • enable the company to learn lessons that can help it better prevent, mitigate and remedy impacts in the future 	C5/a – EFF	There is evidence that the indicators, data-collection processes or other practices through which the company tracks the effectiveness of its efforts to address actual and potential human rights impacts: <ul style="list-style-type: none"> • have, in practice, incorporated perspectives from stakeholders, including from potentially affected stakeholders or their legitimate representatives • have provided insights into the effectiveness of the company’s efforts to address actual and potential human rights impacts 	

C5.1: What specific examples from the period under assessment illustrate if each salient issue is being managed effectively?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE
C5.1/a – APP	<p>[Relevant for the assurance of public reporting]</p> <p>Reported examples of how effectively the company has addressed human rights impacts:</p> <ul style="list-style-type: none"> • reflect situations where the salient human rights issue or issues concerned are particularly significant 	C5.1/a – APP	<p>[Relevant for the assurance of public reporting]</p> <p>Reported examples of how effectively the company has addressed human rights impacts:</p> <ul style="list-style-type: none"> • taken together with other examples, are balanced and broadly representative of the company’s performance, or, where this is not the case, this is made clear and the reporting examples are supported by an explanation of why they were selected • are reliably represented, including with regard to any context that is relevant to understand the effectiveness of the actions taken 	–

C6: How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE
C6/a – APP	There is evidence that senior management and those individuals with responsibility for the company’s overall human rights performance and (where different) for specific salient human rights issues understand that the company has a responsibility to enable effective remedy to any individuals whose human rights are harmed by its actions or decisions.	C6/a–c – EFF	In instances where individuals have been harmed at least in part due to actions or decisions of the company, there is evidence that the company has provided, contributed to or otherwise enabled remedy to those individuals.	–
C6/b – APP	The company has processes or practices through which it systematically considers how it can provide, contribute to or otherwise enable remedy for individuals who have been harmed by its actions or decisions.			–
C6/c – APP	There is no evidence that the company requires individuals who may be impacted by its decisions or actions to waive their right to access to the judicial system as a precondition for employment or any other form of contract or terms of service, or as a prerequisite for using non-judicial remedy channels.			–

C6.1: Through what means can the company receive complaints or concerns related to each salient issue?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE
C6.1/a – APP	<p>The processes or channels through which the company can receive complaints:</p> <ul style="list-style-type: none"> • between them allow access to any individual or group directly at risk of human rights impacts due to the company’s actions or decisions • are designed to be accessible in practice to these individuals and groups • provide explicitly for non-retaliation against complainants 	C6.1/a – APP	<p>The processes or channels through which the company can receive complaints:</p> <ul style="list-style-type: none"> • are managed by individuals with appropriate training in engaging with vulnerable individuals, handling sensitive complaints and ensuring data protection 	–

C6.1/a-c – EFF	There is evidence of individuals raising complaints through the processes or channels available.	AND C6.1/a-c – EFF	There is no evidence that: <ul style="list-style-type: none"> • a decision to access a complaints channel prohibits complainants from access to court systems • complaints channels are being developed or used as a means to undercut the ability of trade unions to organize or represent workers 	AND C6.1/a-c – EFF	There is no evidence that: <ul style="list-style-type: none"> • individuals from any of the groups for which the complaints processes or channels are designed are intimidated out of using the company’s complaints channels, or are subject to retaliation for doing so
–	–	C6.1/b – APP	If certain groups who could be impacted by the company’s decisions or actions are <i>not</i> provided with a means to submit a complaint or concern, there is evidence that they have adequate access to remedy through other channels outside the company.	–	–
C6.1/c – APP	The company offers confidentiality to all complainants where permissible under national law, and makes clear if and why confidentiality cannot be provided.	–	–	–	–
C6.1/d – APP	The company encourages, requires or supports the development of complaints processes among its business partners, suppliers or other relevant third parties and these efforts: <ul style="list-style-type: none"> • promote the effectiveness of such processes, and not just their existence • underline the need for non-retaliation against complainants • are clear that such processes should not be used as a means to undercut the ability of trade unions to organize or represent workers 	–	–	C6.1/d – EFF	Where the company encourages, requires or supports the development of complaints processes among its business partners, suppliers or other relevant third parties, there is evidence of individuals raising complaints through these processes. <p>AND</p> There is no evidence that: <ul style="list-style-type: none"> • complainants are intimidated out of using these complaints processes or are subject to retaliation for doing so • complaints processes are being developed or used as a means to undercut the ability of trade unions to organize or represent workers • the decision to access a complaints channel prohibits complainants from access to court systems

C6.2 How does the company know if people feel able and empowered to raise complaints or concerns?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–	–	C6.2/a – APP	The company has processes or practices for checking whether individuals feel able to raise complaints, which are: <ul style="list-style-type: none"> • free of discrimination • free of bias • culturally appropriate for the groups concerned 	C6.2/a – EFF	There is evidence that people from the groups directly at risk of human rights impacts due to the company’s actions or decisions: <ul style="list-style-type: none"> • know how to submit a complaint should they wish to do so • are able to access any complaints channel in practice given their language, literacy, geographical and cultural needs • do not perceive any barriers to raising complaints should they wish to do so • understand how complaints will be addressed • understand any limitations on the remedy that the process can provide • trust the company to handle a complaint with due attention to confidentiality and protection against retaliation • trust the company to handle complaints fairly • trust the company to engage with them respectfully while handling complaints

		C6.2/b – APP	To the extent that the company makes resources available to complainants to help them engage with the company in addressing a complaint, there is evidence that: <ul style="list-style-type: none"> any advisers or other service providers act independently of the company and in the interests of the complainant 	C6.2/b – APP	To the extent that the company makes resources available to complainants to help them engage with the company in addressing a complaint, there is evidence that: <ul style="list-style-type: none"> any advisers or other service providers can be chosen by and are clearly acceptable to the individuals they are supporting
				C6.2/b – EFF	There is evidence that actual and potential complainants: <ul style="list-style-type: none"> are aware of the availability of any resources have confidence that any advisers or other service providers would act independently of the company and in the complainant's interests where they have used advisers or other service providers, have felt them to be independent of company influence where they have used advisers or other service providers, have found that this helped them understand how best to take forward their complaint

C6.3: How does the company process complaints and assess the effectiveness of outcomes?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE	
C6.3/a – APP	The company has a clear process (or processes) through which it addresses complaints and which: <ul style="list-style-type: none"> allocates clear responsibility within the company for addressing the complaint provides accountability for addressing the complaint provides reasonable time limitations for addressing the complaint pays attention to the compatibility of proposed outcomes with international human rights standards provides for transparency to the complainant regarding how their complaint is being handled 	C6.3/a – APP	The company has a clear process (or processes) through which it addresses complaints and which: <ul style="list-style-type: none"> provides for engagement with the complainant whenever necessary to ensure a fair and respectful process provides for support to the complainant whenever necessary to ensure a fair and respectful process provides for issues to be escalated for senior-level attention when they raise severe human rights impacts or represent significant disputes 		
C6.3/a – EFF	There is evidence that: <ul style="list-style-type: none"> complaints raised with the company are processed within prescribed time limits, or otherwise within a reasonable amount of time proposed solutions have been shared and (where feasible) discussed with complainants any severe human rights impacts or significant disputes over outcomes have been escalated for senior-level attention 				
C6.3/b – APP	The company has processes and/or practices to evaluate the implementation and effectiveness of outcomes from its complaints processes, including of remedies provided, which: <ul style="list-style-type: none"> consider the compatibility of outcomes and remedies with international human rights standards seek feedback from those who have brought complaints, using appropriate methods to ensure their perceptions are accurately captured 	C6.3/b – EFF	There is evidence that remedies agreed through these processes: <ul style="list-style-type: none"> have been or are being implemented are compatible with international human rights standards 	C6.3/b – EFF	There is evidence that remedies agreed through these processes: <ul style="list-style-type: none"> are viewed as satisfactory by the complainants and (where not the same) by the recipients of the remedy OR There is evidence in instances where complainants/recipients do not consider the remedy satisfactory, that they found the process itself to be fair and respectful.

			C6.3/c – APP	To the extent that the company specifies third-party mechanisms to which complaints that are not resolved at the operational level may be escalated: <ul style="list-style-type: none"> • these mechanisms have the resources and expertise necessary to address such complaints • these mechanisms are perceived among experts to be legitimate and independent of the company 	
		C6.3/c – EFF	There is evidence that where complaints have been escalated to a third-party mechanism, it has led to outcomes that: <ul style="list-style-type: none"> • are compatible with internationally recognized human rights 	C6.3/c – EFF	There is evidence that where complaints have been escalated to a third-party mechanism, it has led to outcomes that: <ul style="list-style-type: none"> • were viewed as acceptable by complainants OR <ul style="list-style-type: none"> • did not lead to complainants challenging the integrity of the mechanism itself
		C6.3/d – APP	Where the company has commissioned an independent review of the processes through which complaints can be addressed, there is evidence that the review: <ul style="list-style-type: none"> • was conducted without interference, or threat of interference, from the company or a third party • was conducted with due attention to confidentiality for those providing their views • was conducted by individuals with relevant expertise 	C6.3/d – APP	Where the company has commissioned an independent review of the processes through which complaints can be addressed, there is evidence that the review: <ul style="list-style-type: none"> • paid appropriate attention to the perceptions of the intended users of the processes, including those who used it in practice • was viewed as credible by intended users of the processes and by informed experts
	Where the company has commissioned an independent review of the processes through which complaints can be addressed: <ul style="list-style-type: none"> • any lessons and recommendations from the review have been, are being or are due to be implemented, or the decision not to implement them has been clearly explained • the name of the reviewer is provided in any public report 	C6.3/d – EFF	Where the company has commissioned an independent review of the processes through which complaints can be addressed: <ul style="list-style-type: none"> • the findings of the review are fairly represented in any public report (whether in full or in summary form) 		–

C6.4: During the period under assessment, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?

TIER ONE ASSURANCE		TIER TWO ASSURANCE		TIER THREE ASSURANCE
C6.4/a – APP	The company has a process or processes for identifying trends and patterns in complaints and their outcomes, which is: <ul style="list-style-type: none"> • capable of accurately identifying relevant information 		–	–
C6.4/a – EFF	Information or data used to identify trends is relevant and reliable.	AND C6.4/a – EFF	Trends or patterns identified are: <ul style="list-style-type: none"> • fairly assessed • fairly articulated • placed in the context necessary to understand their implications 	–
	If facts, trends or patterns in complaints received clearly indicate a need to introduce or change company policies, processes or practices, there is evidence that the company: <ul style="list-style-type: none"> • has acted upon those lessons • has shared the lessons across all parts of the company for which they are relevant • has shared the lessons with any relevant third parties 	C6.4/b – APP	Any lessons the company has learned from complaints it has received, are based on: <ul style="list-style-type: none"> • a robust analysis of the trends and patterns identified • any additional information necessary to draw informed conclusions 	–

C6.5: During the period under assessment, did the company provide or enable remedy for any actual impacts related to a salient issue, and, if so, what are typical or significant examples?

TIER ONE ASSURANCE	TIER TWO ASSURANCE		TIER THREE ASSURANCE	
–	C6.5/a – APP	<p>[Relevant for the assurance of public reporting] Reported examples of actions taken by the company to provide or enable remedy for actual human rights impacts:</p> <ul style="list-style-type: none"> • include examples of remedy for any particularly severe impacts with which the company has been involved (subject to legitimate legal or other constraints as recognized under Reporting Principle G of the UN Guiding Principles Reporting Framework) • taken together with other examples, are balanced and broadly representative of the company’s performance, or, where this is not the case, this is made clear and the examples provided are supported by an explanation of why they were selected 	C6.5/a – APP	<p>[Relevant for the assurance of public reporting] Reported examples of actions taken by the company to provide or enable remedy for actual human rights impacts:</p> <ul style="list-style-type: none"> • are accurately represented, including with regard to any context that is relevant to understand the actions taken
–	C6.5/a – EFF	<p>[Relevant for the assurance of public reporting] There are no legal disputes, campaigns, credible media or other reports indicating that recipients consider remedy to have been substantially inadequate.</p>	C6.5/a – EFF	There is evidence that recipients of remedy in the context of reported examples: <ul style="list-style-type: none"> • consider that the remedy provided was acceptable • consider that the remedy provided was effective

UN GUIDING PRINCIPLES

REPORTING FRAMEWORK

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