

Appendix B

Examples of policy commitments



1. GENERAL STATEMENTS

POSSIBLE BUILDING BLOCK

Outline of the purpose of the policy and how it fits in the hierarchy

Can be a reference to human rights in the company's business principles or other overarching value statement; alternatively, a quote from the CEO on human rights

SAMPLE TEXT

Total ⁹⁴

“As stated in our Code of Conduct, respect for Human Rights standards is one of our three priority business principles,” Patrick Pouyane, Chief Executive Officer”

Nedbank ⁹⁵

“The Nedbank Group Human Rights Statement:

- provides guidance to business clusters and employees regarding their responsibilities relating to human rights;
- contributes to international best practice;
- is linked to the Nedbank vision to build Africa's most admired bank by our staff, clients, shareholders, regulators and communities; and
- demonstrates to our key stakeholders that we manage our human rights impact, risks and opportunities effectively.”

Hitachi ⁹⁶

“Hitachi is aware that as a business enterprise it is a member of society and can contribute to creating an environment in which human rights are respected. Meeting the responsibility to respect human rights is key to operating as a responsible business, and is accepted to be a baseline expectation for all companies. It is an expression of Hitachi Group's Mission and Vision. This policy supplements the Hitachi Group Codes of Conduct and CSR policy.”

POSSIBLE BUILDING BLOCK

A general statement that includes an explicit commitment to respect human rights.

Could also express support for human rights (for example, when the company signed on to the Global Compact)

SAMPLE TEXT

AngloGold Ashanti ⁹⁷

“Respect for human rights is an essential part of AngloGold Ashanti's vision and values. It is fundamental to our value of treating each other with dignity and respect.

“We support the vision of a world where everyone can enjoy their universal human rights, and where business plays its part by respecting all human rights.

“States are responsible for the protection, promotion and fulfilment of human rights and companies have a responsibility to respect human rights.”

Microsoft ⁹⁸

“We recognize the important responsibility we have to respect human rights and we aim to bring the power of technology to bear to promote respect for human rights throughout the world.”

POSSIBLE BUILDING BLOCK

A reference to international human rights standards, other applicable standards, and how they relate.

- Companies may want to reference additional relevant standards here as applicable to their particular industry
- Address in the policy how to deal with a conflict between national laws and the company's commitment to human rights

94. www.goo.gl/PJRjwQ
95. www.goo.gl/jR6N1j

96. www.goo.gl/Wx8Uxz
97. www.goo.gl/bRq7E7

98. www.goo.gl/1VAoI4

SAMPLE TEXT**Human rights standards****The Coca-Cola Company**⁹⁹

“The Coca-Cola Company’s Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.”

Conflicting standards**BASF**¹⁰⁰

“Compliance with the ILO’s core labor standards is mandatory for us worldwide. This includes the prevention of child and forced labor, adherence to the principle of non-discrimination in the workplace, the right of freedom of association and assembly, and the right to collective bargaining. This applies provided national law does not explicitly prohibit adherence to the ILO core labor standards. In such cases, we develop innovative approaches to promote the adoption of the principles that form the foundation of these international standards.”

Fujitsu¹⁰¹

“(…) We are committed to comply with local laws and regulations protecting human rights in our activities. Where local laws and regulations are not fully consistent with the principles of internationally recognized human rights, we will seek ways to advance those principles in a manner respectful of local requirements.”

 **POSSIBLE BUILDING BLOCK**

An explanation of how the company respects all human rights, but also gives focus to its human rights due diligence.

Prioritisation should focus on the most severe human rights impacts that a company may be involved with

SAMPLE TEXT**H&M**¹⁰²

“Due to the nature of our business we are focusing our efforts on human rights related to labour conditions. We also focus on women’s rights and the right to water, as these are areas of specific importance to our industry. H&M does, however, recognise that other human rights may become greater priorities over time and we will regularly review our focus areas.”

TOTAL¹⁰³

“The [Total] Group is committed to respect internationally recognized Human Rights standards in the countries where we work. In doing so we focus on the following important issues:

- respect for Human Rights in the workplace for our employees and promotion of these principles in our supply chain, in particular by preventing child and forced labor, avoiding discrimination, observing workers rights and by respecting freedom of expression.
 - addressing the potential impacts of our operations on local communities, in particular on the right to an adequate standard of living, such as the right to water and housing, and by providing access to remedy for unavoidable adverse impacts related to our operations.
 - ensuring that the security of our people and facilities is managed in a responsible way and that the rights of neighboring communities are respected; the management of security risks, including the use of government security forces and private security providers, should be in line with applicable international standards related to the proportionate use of force.”
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99. www.goo.gl/8JyAr1
100. www.goo.gl/qYnaWm

101. www.goo.gl/5BaxCt
102. www.goo.gl/hPx2bs

103. www.goo.gl/PjBjwQ

2. SPECIFIC STATEMENTS

POSSIBLE BUILDING BLOCK

How the company ensures it respects the rights of its workforce.

In addition to the core labour standards, specific labour rights a company may want to highlight in relation to employees and contract workers based on the company's analysis of its salient issues include:

- Right to just and favourable conditions of work
- Right to a safe work environment
- Right to equality at work
- Rights to form and join trade unions and to collective bargaining

SAMPLE TEXT

H&M ¹⁰⁴

"H&M seeks to respect the human rights of all employees within the H&M Group as well as complying with all national laws. Our commitment is manifested in policies such as the Discrimination and Equality Policy and the Global Harassment Policy. To ensure remediation of potential abuses, we have a complaint procedure which is applicable to the whole organisation. Any employee with concerns regarding the human rights impacts of H&M's activities may raise these through the internal Complaint Procedure process."

Total ¹⁰⁵

"The Group pays special attention to employees' working conditions, respect for individuals and their privacy, a discrimination-free environment and health and safety, irrespective of the political and social context or any complexities encountered in the countries where we operate." [Followed by specific labour standards; see original source.]

POSSIBLE BUILDING BLOCK

How the company aims to ensure product safety, prevent misuse of its products, and respect customers' rights.

Here, non-labour rights related to product use could be addressed, such as:

- Right to health
- Children's rights
- Right to privacy

SAMPLE TEXT

H&M ¹⁰⁶

"H&M seeks to respect the human rights of our customers in all operating countries. Our main focus areas include: respecting the privacy of our customers e.g. by safe storing of any personal data, as described in our Privacy Policy; and aiming for that no customers are discriminated against, as outlined in our Discrimination and Equality Policy. In addition, we strive so that our marketing is done with respect for the views of our stakeholders by not aiming to communicate any specific ideal, but rather a range of styles, attitudes and ethnic backgrounds. This commitment is supported by our Advertising Policy. To make sure that communication, marketing and product design do not have a negative effect on children's rights, H&M has special guidelines for the advertising of children's concepts and pays particular attention to child safety throughout all stages of production."

POSSIBLE BUILDING BLOCK

How the company integrates human rights into its interactions with business partners.

Address, if possible, which rights are particularly prevalent in interaction with business partners:

- Health and safety may be an important issue with contractors
- Working hours may be an issue that comes up at suppliers

104. www.goo.gl/hPx2bs
105. www.goo.gl/H7RkKs

106. www.goo.gl/hPx2bs

SAMPLE TEXT**Walmart**¹⁰⁷

“The safety and wellbeing of workers across our supply chain is important to Walmart. Our Standards for Suppliers, along with our Standards for Suppliers Manual, make clear our fundamental expectations for suppliers and factories. All suppliers and their facilities – including subcontracting and packaging facilities – are expected to uphold these standards.”

Unilever¹⁰⁸

“In our business dealings we expect our partners to adhere to business principles consistent with our own. We prohibit discrimination, forced, trafficked and child labour and are committed to safe and healthy working conditions and the dignity of the individual. Also the right to freedom of association and collective bargaining and effective information and consultation procedures.”

Rabobank¹⁰⁹

“All clients are expected to respect and promote human rights as described in the United Nations Declaration of Human Rights in their business decisions, and are expected to use their influence with their suppliers to do the same. For unavoidable adverse impacts, they are expected to provide for and cooperate in remediation through legitimate processes.”

POSSIBLE BUILDING BLOCK

How companies ensure respect for the human rights of other stakeholders whose human rights they may potentially impact.

Likely to be company and operations specific

SAMPLE TEXT**BHP Billiton**¹¹⁰

“BHP Billiton commits to the International Council of Mining and Metals (ICMM) Position Statement on Indigenous Peoples and Mining for engaging with Indigenous peoples in relation to new operations or major capital projects that are located on lands traditionally owned by, or under customary use of Indigenous peoples, and are likely to have significant adverse impacts on Indigenous peoples(...).”

Asia Pulp and Paper (APP)¹¹¹

“Where new plantations are proposed, APP will respect the rights of indigenous peoples and local communities, including recognition of customary land rights. APP has committed to independent [High Conservation Value] assessments as part of this commitment and will, in consultation with stakeholders, develop further measures to implement [free, prior and informed consent (FPIC)]. APP will consult with NGOs and other stakeholders to ensure that its protocols and procedures for FPIC and conflict resolution are in accordance with international best practice.”

POSSIBLE BUILDING BLOCK

Other human rights commitments.

Here, the company can express support (in addition to respect) for human rights in line with its commitment to the Ten Principles of the UN Global Compact

SAMPLE TEXT**Unilever**¹¹²

“We believe that our products bring many positive benefits, particularly in the areas of health and sanitation. As part of our ambition to Enhance Livelihoods, we state our commitment to Fairness in the Workplace, Opportunities for Women and Inclusive Business.”

107. www.goo.gl/J92XJh
108. www.goo.gl/rhLshD

109. www.goo.gl/1Dx8lF
110. www.goo.gl/zwAbv4

111. www.goo.gl/FD2KuS
112. www.goo.gl/rhLshD

3. PROVISIONS FOR IMPLEMENTATION

POSSIBLE BUILDING BLOCK

Who is responsible for implementation and update of the policy

SAMPLE TEXT

Total ¹¹³

“The Group created a Human Rights Coordination Committee managed by the Ethics Committee chair in cooperation with the Group’s Human Rights lawyers. This information and decision-making forum meets three or four times a year. Corporate and Business segment representatives including security, communication, purchasing and sustainable development are part of this forum. This initiative also coordinates the activities undertaken internally and externally by the Group’s Business units in this domain. External advisors such as the Danish Institute for Human Rights may attend some of these sessions in order to inform and advise the Committee on specific topics related to Human Rights.”

Unilever ¹¹⁴

“Our work in this area is overseen by the Unilever Chief Executive Officer, supported by the Unilever Leadership Executive including the Chief Supply Chain Officer, Chief Human Resources Officer, Chief Marketing and Communications Officer and the Chief Legal Officer and also the Chief Sustainability Officer and the Global Vice President for Social Impact. This ensures that every part of our business is clear about the responsibility to respect human rights. Board-level oversight is provided by the Corporate Responsibility Committee of Unilever PLC.”

POSSIBLE BUILDING BLOCK

How the policy statement is embedded into company systems and processes

SAMPLE TEXT

Unilever ¹¹⁵

“We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved whether directly or indirectly through our own activities or our business relationships. We manage these risks by integrating the responses to our due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.”

POSSIBLE BUILDING BLOCK

How the company engages in remediation where it has caused or contributed to an impact

SAMPLE TEXT

Hitachi ¹¹⁶

“Where Hitachi identifies that it has caused or contributed to a negative human rights impact, the company will provide for or cooperate in legitimate processes to provide remediation.”

113. www.goo.gl/PJRjwQ

114. www.goo.gl/rhLshD

115. www.goo.gl/rhLshD

116. www.goo.gl/Wx8Uxz

 **POSSIBLE BUILDING BLOCK**

How the company conducts stakeholder engagement

SAMPLE TEXT

Unilever¹¹⁷

“We recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks.”

 **POSSIBLE BUILDING BLOCK**

A reference to related policies that address human rights and who can be contacted for more information

SAMPLE TEXT

Nedbank¹¹⁸

“We will make available an external email reporting line called ‘Talk to the ethics office’ as a mechanism for any external parties to report any human rights concerns or comment on the statement. Emails can be sent to TalkToTheEthicsO@nedbank.co.za.”

117. www.goo.gl/rhLshD

118. www.goo.gl/jR6Nij