Federal Ministry
of Labour and Social Affairs

SECTOR DIALOGUE
Automotive Industry

Business & Human Rights

Respecting human rights along global supply and value chains of Germany's automotive industry

Guideline
for the core element

Reporting

Contents

1. Introduction to the guidelines

Context

Protecting human rights is a duty of the state. This duty cannot be transferred to any other social actors. Business enterprises also have a responsibility to respect human rights. This means they must be aware of the impact of their activities on human rights, and establish due diligence processes in order to prevent, mitigate or compensate for any adverse impacts.

Against this background, the German Federal Government adopted the National Action Plan for Business and Human Rights (NAP) on 21 December 2016. The NAP is based on the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), which the United Nations Human Rights Council adopted by consensus in 2011, thus creating an internationally recognised framework for human rights due diligence. In accordance with the content of the UN Guiding Principles, the NAP sets out the duty of the state to protect human rights and the responsibility of enterprises to respect human rights in their global supply and value chains.

Germany's Federal Government has established 'sector dialogues' to support enterprises operating in sectors with particularly high human rights risks. The dialogues are implemented by the Federal Ministry of Labour and Social Affairs (BMAS). The goal of the dialogues is to help enterprises find appropriate ways of implementing the five core elements of human rights due diligence and therefore contribute to the improvement of the human rights situation.

The five core elements are:

- human rights policy statement
- procedures for the identification of actual or potential adverse impacts on human rights
- measures to ward off potential adverse impacts and to review the effectiveness of these measures
- reporting
- grievance mechanism

In addition, from 2023 onwards, the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz, LkSG) requires certain enterprises to take appropriate action to observe human rights and environmental due diligence obligations in their supply chains.[1] As there is a great deal of overlap between the LkSG and the NAP, the sector dialogues also offer meaningful support to help enterprises meet the requirements of the Supply Chain Act.

As a key industry in the German economy, at its production sites around the world, and together with a network of suppliers, the automotive sector contributes to employment, training and economic development. Over half of the value added within the sector is generated by suppliers – from the extraction of raw materials and manufacture of inputs through to component assembly and the production of entire vehicles. At the same time, the situation in the automotive sector's globally dispersed supply and value chains poses significant human rights risks in many areas. This is particularly the case in upstream processes. Furthermore, human rights violations and corruption

[1] The German Supply Chain Act came into force on 1 January 2023. All enterprises based in Germany with at least 3,000 employees, regardless of their legal form, and all enterprises with a branch in Germany and at least 3,000 employees in the country, are now required to fulfil certain human rights and environmental due diligence obligations. For affiliated enterprises, the figure for the parent company includes the total number of workers employed at all the group's companies in Germany and any employees currently on international secondments. From 1 January 2024, the threshold will fall to 1,000 employees. Small and medium-sized enterprises (SMEs) will also be affected indirectly, since enterprises subject to the LkSG will impose their own due diligence obligations on their suppliers.

are more likely to occur in states where the rule of law is lacking, institutions are weak, and poverty is endemic. Human rights risks that may arise in such countries include damage to the health or safety of workers and local people, discrimination, restrictions on freedom of association and violations of indigenous peoples' rights. The responsibility of the German automotive industry to design sustainable global supply and value chains and to respect human rights is therefore of great importance.

Why is there a Sector Dialogue Automotive Industry?

Enterprises in the automotive industry maintain close links with their consumers. As such, the increasingly stringent requirements surrounding sustainability performance and human rights due diligence go beyond large manufacturers and suppliers of the automotive industry. Increasingly, small and medium-sized enterprises (SMEs) must also rise to the challenge of developing responsible supply and value chains – from the extraction of raw materials to the final product and eventual disposal.

In this context, implementing human rights due diligence can be seen as a learning journey, an individual and ongoing process that each enterprise will need to monitor regularly and keep on improving.

Furthermore, the challenges involved are often complex and diverse, reflecting the highly interwoven nature of supply and value chains. Many vehicle manufacturers and suppliers are already actively engaged in the field of human rights, either as individual enterprises or through national and international initiatives. A joint sectoral approach and industry-wide cooperation can have an even greater impact given the structural similarities between supply and value chains. This is why industry actors representing enterprises, business associations and unions have come together with civil society organisations and the Federal Ministry of Labour and Social Affairs (BMAS) to establish a sector dialogue for respecting human rights along global supply and value chains of Germany's automotive industry.

The goal of the Sector Dialogue is to contribute to the improvement of the human rights situation along the industry's global supply and value chains. It focuses on the responsibility of enterprises to respect human rights. The five core elements described in the NAP help enterprises to implement human rights due diligence in their business activities and to integrate it into their operational management processes. With this goal in mind, the members of the Sector Dialogue have produced a series of guidelines for implementing the five NAP core elements. In this context, the guidelines are designed to act as both a point of reference and a toolbox for enterprises.

How do the guidelines differ from other advice?

The guidelines for the five NAP core elements of human rights due diligence differ in key areas from previous advice and therefore provide significant additional value.

- The guidelines form a collection of self-contained and structurally identical manuals that fully address the NAP requirements.
- The purpose of the NAP is to set out the UN Guiding Principles on Business and Human Rights from an implementation perspective. The guidelines reference the UN Guiding Principles and therefore contribute significantly to the implementation of the wider international framework, whose goals are explicitly recognised by all members of the Sector Dialogue.
- The guidelines include concrete references to the requirements of the Supply Chain Act (LkSG). This will help enterprises that fall under the scope of the law to meet their statutory obligations at the same time. In certain areas, the guidelines go beyond the above-mentioned policy frameworks and regulatory requirements.
- Other relevant guidance has been incorporated into the guidelines alongside examples of current business practice. The guidelines take into account the characteristics of both large enterprises and SMEs.
- With the help of the guidelines, users can review their progress towards fulfilling the NAP requirements (e.g. through checklists). In this way, they create transparency and verifiability for enterprises and their stakeholders and can demonstrate the progress made towards implementation.
- The guidelines – or parts of them – can also be used by your enterprise for training courses or as training resources.

Members of the Sector Dialogue have spent roughly two years drawing up the guidelines in a multi-stakeholder process. The strength of the guidelines lies in the wealth of knowledge and experience of individual members, and as such they have been broadly welcomed among the Sector Dialogue's various stakeholder groups.

How are the guidelines structured?

This document focuses on the core element 'Reporting' and

- summarises the key points in the guideline at a glance (section 2);
- clearly explains the NAP requirements for this core element and cites which parts of the LkSG apply for reporting purposes (section 3);
- sets out practical and industry-specific steps to integrate the NAP requirements into business management processes (section 4);
- shows how progress towards implementation can be reviewed and made transparent in business practice (section 5);
- lists further information and sources of additional reading (sections 6.1 and 6.4);
- compares the NAP and LkSG requirements side by side in a table, with references to the implementation steps in the guideline (section 6.2); and
- contains a glossary of relevant terms used in the field of human rights due diligence as well as selected definitions from the LkSG and the explanatory memorandum to the LkSG (section 6.3).

2. Core element ‘Reporting’ – the key points at a glance

To meet their due diligence obligations, enterprises must be transparent about the adverse human rights impacts of their business activities. That involves both formal, public reporting on those impacts (e.g. as part of a wider sustainability or management report or in a dedicated human rights report) and maintaining a proactive dialogue with stakeholders and (potentially) affected groups. In this context, your enterprise will need to keep an ongoing and thorough internal record of relevant information, then present and communicate that information in a form that meets the needs of each target group. The goal here is to be able to explain to your stakeholders and to rights holders that you are aware of the actual and potential adverse impacts of your corporate activities and are taking appropriate action to counter them.

This guideline will help you implement the NAP due diligence processes step by step so that you can not only build up a structured internal documentation system, but also establish and continuously refine your internal and external communications in this area. There is no absolute requirement to set up a whole new set of reporting systems. You can use existing processes and build on the information available within your enterprise.

The guideline proposes the following steps:

1. Establish the format, scope, timings and periods of your communications and reports. Make sure that the arrangements comply with your reporting and auditing obligations. As far as possible, and where relevant, your communications and reports should cover the entire value chain. A balance should be achieved between the time and cost involved in compiling this information and the needs of your target groups.
2. Decide what will go into your communications and reports. This must include all the required information on human rights issues with serious implications, your risk analysis, grievance procedures, measures, remedial actions and effectiveness reviews. Make sure that you include concrete examples and add notes, where relevant, to explain any conflicting business objectives.
3. Define the target groups for your communications and reports with due regard for relevant interest groups and regulatory requirements.
4. Update your current reporting processes to ensure that all the relevant information you compile on human rights due diligence processes and impacts is quality-assured and standardised.
5. Once you have compiled the information, prepare it in a form that meets the needs of your identified target groups.
6. Obtain internal approval from the relevant bodies and responsible persons, then communicate the information.

To help you implement these steps efficiently, the guideline offers examples of good practice from the automotive sector and other similar industries, as well as advice on where you can find additional information. It also highlights the LkSG’s reporting and communication requirements and explains which steps in the guideline are designed to help you meet them. Finally, the guideline includes a checklist that you can use to assess your progress towards implementing the NAP’s human rights due diligence requirements.

3. What are the requirements that reporting must meet?

Transparency is an essential element of corporate human rights due diligence, not only with regard to formal reporting mechanisms, such as your sustainability report and the management report linked to your financial statements, but also in terms of your willingness to engage proactively with stakeholders and (potentially) affected groups in an open dialogue and to share information when requested. The NAP[2] requirements for enterprises are summarised below.[3]

Objective and subject matter of your reports

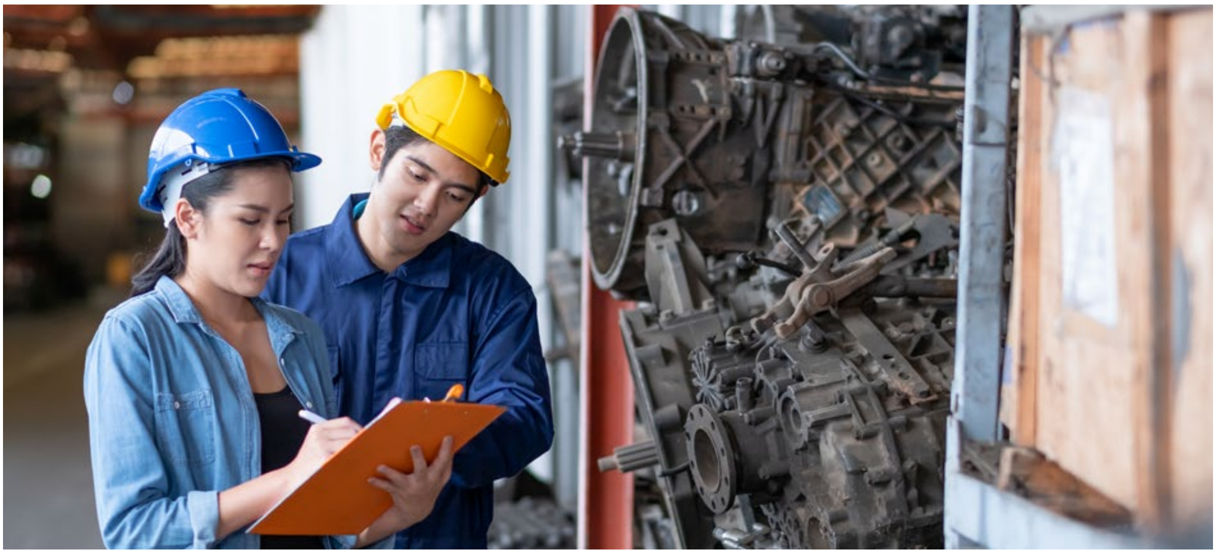
A. Your enterprise keeps relevant information available so that it can explain to its stakeholders and to rights holders that it is aware of the actual and potential impacts of its corporate activities and is taking appropriate action to counter them. This requires the enterprise to first obtain the information and ensure that it is reliable and internally documented.

Format and characteristics of your reports

B. The information is presented in a form that meets the needs of the enterprise's target groups.
C. It is important to avoid disproportionate administrative costs for the other enterprises (especially SMEs) in your value chain and for any group companies subject to reporting obligations.

Scope and reach of your reporting

D. The enterprise produces regular, publicly available reports. These can be scheduled to match the enterprise's existing timetable of reports.
E. The public reports may take the form of dedicated new or existing formats.



[2] See German Federal Government (2016) National Action Plan: Implementation of the UN Guiding Principles on Business and Human Rights, pages 9 and 21.
[3] Note: The glossary in section 6.3 includes the exact text from the National Action Plan for Business and Human Rights setting out requirements for the core element 'Reporting'.

What requirements does the Supply Chain Act (LkSG) impose on enterprises with regard to documentation and reporting?[4]

Section 10 (1) LkSG states that the 'fulfilment of the due diligence obligations pursuant to section 3 must be **continuously documented within the enterprise**' and that the '**documentation must be kept for at least seven years**'. Documentation that contains business and trade secrets may not be publicly accessible. However, pursuant to section 15 in conjunction with section 17 (2) no. 2 LkSG, enterprises must comply with any request by the competent authority for documentation.

Furthermore, as set out in section 10 (2) sentence 1 LkSG, the enterprise must prepare a comprehensible '**annual report** on the fulfilment of its due diligence obligations in the previous financial year and make it publicly available free of charge on [its] website **no later than four months after the end of the financial year for a period of seven years**'.

Pursuant to section 10 (2) sentence 2 LkSG: 'The report must at least state in a comprehensible manner,

1. whether the enterprise has identified any human rights and environment-related **risks** or **violations** of a human rights-related or environment-related obligation, and if so, which ones,
2. what the enterprise has done to fulfil its due diligence obligations with reference to the **measures** described in sections 4 to 9; this also includes the elements of the **policy statement** pursuant to section 6 (2) as well as the measures taken by the enterprise as a result of complaints pursuant to section 8 or section 9 (1),
3. how the enterprise **assesses** the **impact** and **effectiveness** of the measures and
4. what **conclusions** it draws from the assessment for future measures.'

Section 10 (4) LkSG specifies that 'Due consideration is to be given to the **protection of business and trade secrets**.'

Pursuant to section 10 (3), 'If the enterprise [as part of an appropriate risk management system] has not identified any risk to human rights or environment-related risk and no violation of a human rights-related or an environment-related obligation and has plausibly explained this in its report, **no further details** as pursuant to [section 10] paragraph (2) nos. 2 to 4 are required.' With regard to the **comprehensibility** requirement in section 10 (2) sentence 2, the Federal Government's explanatory memorandum clarifies that the information must be accurate and sufficiently comprehensive for third parties and government authorities to understand it and conduct appropriate plausibility checks. To this end, the enterprise must set out and explain the individual steps, arrangements and measures it has followed, with reference to its human rights strategy and any alternative actions that it may have considered. In its reports, the enterprise must evaluate the impact of the measures taken and outline its planned follow-up measures.

Section 12 LkSG states that 'The report must be submitted 'in **German** and **electronically via an electronic/digital access provided by the competent authority**.' This must be done 'no later than four months after the end of the financial year to which it relates.' According to section 13 (1) LkSG, '**The competent authority checks** whether (...) the report pursuant to section 10 (2) sentence 1 has been provided and (...) the requirements according to section 10 (2) and (3) have been complied with.' Section 13 (2) continues: 'If [these] requirements (...) have not been met, the competent authority may demand that the enterprise rectify the report within a reasonable period of time.' Section 13 (3) specifies that 'The Federal Ministry of Labour and Social Affairs is authorised to regulate (...) the procedure for submitting the report (...) and the procedure for report audits by the authorities (...) in more detail by statutory instrument in agreement with the Federal Ministry for Economic Affairs and Energy without the consent of the Bundesrat.'

The Federal Government's explanatory memorandum clarifies that the authority will provide an **electronic/digital method of access** for the reporting format and that a **separate report** should be produced for the purposes of the Act.

[4] The glossary in section 6.3 of this guideline includes definitions of key terms used in the LkSG. Section 6.2 compares the NAP and LkSG requirements side by side in a table with references to the implementation steps recommended in the guideline.

Damage to the environment can also lead to violations of human rights

Inevitably, the activities of enterprises and their relationships with other businesses through supply and value chains also involve impacts on the environment that may lead directly or indirectly to human rights risks as well as adverse human rights impacts. In this context, the actions of enterprises and any related environmental damage may also create human rights risks and may have an adverse impact on human rights both directly and indirectly. Air, water and soil pollution, for example, can threaten the livelihoods of local populations. If an enterprise extracts too much groundwater in a region already suffering from water shortages, for instance, it may violate the right to an adequate standard of living. Equally, the mishandling of hazardous waste may lead to human rights violations if it creates a danger to human health. Furthermore, any deliberate destruction of culturally and ritually important sites may constitute a violation of human rights, as it limits the right of people to take part in cultural life. It follows that preventive and remedial measures must also take account, at least implicitly, of any environmental damage that could have an adverse impact on human rights and that was therefore identified in the risk analysis.

With regard to environment-related obligations, the LkSG contains a number of explicit prohibitions: causing any harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption; the manufacture, use and treatment of mercury; the production and use of persistent organic pollutants; the handling, collection, storage and disposal of waste in a manner that is not environmentally sound; and exports and imports of hazardous waste.

4. How can your enterprise implement the requirements step by step?

Balanced and transparent reporting is essential for your enterprise to credibly demonstrate that it is dealing appropriately with human rights risks across its own value chain. This applies both to your external communications and public reports and to your internal systems for documenting and communicating information about the enterprise’s human rights due diligence processes. It is recommended that you address controversial questions and current issues as and when they arise. To this end, you should engage with affected rights holders and other external stakeholders, e.g. civil society groups, trade unions and human rights experts. The results should then be published. Detailed information on how to engage external with stakeholders can be found in the guideline for the core element ‘Grievance mechanism’.

Tip: Be proactive in your approach to corporate due diligence

With regard to the core element ‘Reporting’, the NAP requires enterprises to maintain information about the human rights impacts of their business activities and how these issues are addressed internally, and to communicate that information externally. External reporting can take the form of a company or sustainability report, an integrated management report or a dedicated human rights report. You can also use a wide range of ongoing and reciprocal communication channels and mechanisms to keep stakeholders and (potentially) affected groups informed. These include your website, dialogue events, social media and, where appropriate, informal contacts, e.g. with civil society organisations and the representatives of affected groups and local communities. Accordingly, this guideline highlights not only concrete steps for implementing your documentation and reporting obligations, but also mechanisms that you can adopt for general internal and external communication purposes.

The guideline’s approach is proactive, based on the assumption that it is in the best interests of your enterprise to meet its human rights due diligence obligations. As such, the guideline goes beyond the requirements of the NAP, which stipulates regular, proactive external reporting only in the case of enterprises exposed to a particularly high risk of human rights violations.

It is recommended that you address controversial questions and current issues as and when they arise and engage with affected rights holders and other external stakeholders.

In this context, communication should take the form of dialogue, i.e. a two-way process between your enterprise and its stakeholders. When choosing your communication channels, you should ensure wherever possible (e.g. by conducting a materiality assessment) that stakeholders are adequately involved and that your target groups are able to make contact. Make sure that your enterprise responds to all input from stakeholders. Dialogue-based communication and reporting are not just about sharing information ‘on request’. It is recommended to report on all risks that you identify and to clearly state any conflicting objectives. Whether you are a large enterprise or an SME, this transparency offers numerous opportunities. For example, it allows you to further develop your internal due diligence processes and manage your human rights risks more effectively.

Other benefits

- Improved communication with government authorities (e.g. in relation to the LkSG)
- Increased cooperation across departments due to the compiling, evaluation and pooling of information
- Greater commitment to respecting human rights and impetus to improve human rights due diligence processes
- Improved access to capital markets
- Stronger market position, giving you an edge over competitors
- Better capacity to meet the growing requirements of your business customers for information
- More attractive as an employer
- Improved stakeholder relations thanks to greater credibility and trust
- Encouragement and incentives for your external stakeholders (e.g. suppliers) to further develop their own due diligence processes

There is no need to create a whole new set of reporting procedures. You can use existing processes and build on the information available within your enterprise. In most cases, the scope of an enterprise's human rights reporting will depend on the volume and complexity of its business activities.

What are the ingredients of good external reporting?

Many enterprises already report on their approaches and the measures they take to respect human rights in their annual sustainability report or in a dedicated section of their annual report. Together with future e. V., Germany's Institute for Ecological Economy Research (IÖW) has been **ranking sustainability reports** since 1994. That involves evaluating the reports produced by small, medium-sized and large enterprises based in Germany. The ranking system is designed to highlight examples of good sustainability reporting.

For SMEs, too, there are many good reasons to establish a regular system of reporting. There are multiple links between transparency and business success. For one, transparency generates trust among consumers, employees and the public. It can also help your enterprise to fulfil more demanding supply chain requirements.

At the same time, transparency makes your enterprise more credible. The scope of an enterprise's human rights reporting will also depend on the scale and complexity of its business activities. Many SMEs already publish regular sustainability reports, partly in anticipation of future requirements (e.g. the Corporate Social Responsibility Directive, CSRD).

The German Sustainability Code (DNK) is a good entry point into sustainability reporting. To meet the DNK requirements, enterprises are required to submit declarations of compliance with the 20 different sustainability reporting criteria and the corresponding non-financial indicators (NFIs).
German Sustainability Code (DNK)

4.1 Step 1 – Lay the foundations

The purpose of your internal documentation and your internal and external communications is to inform rights holders and stakeholders about the enterprise's human rights due diligence processes. These activities also serve to demonstrate that those processes are appropriate, effective and transparent.

Which stages of the supply and value chain should/must you cover in your communications and reporting?

The obligation to identify and document the actual and potential impacts of your business activities on human rights, and to address them through appropriate measures, covers the entire supply and value chain. The same degree of coverage also applies to your communications, so that your stakeholders and (potentially) affected groups can gain an appropriate level of understanding.

Following a risk-based approach, you may choose to prioritise certain areas, e.g. specific human rights issues with serious implications or particular stages of the supply and value chain. This is fine, as long as you provide clear reasons for doing so (e.g. citing the results of your risk analysis).

Your communication and reporting activities must be proportionate

As set out in the NAP requirements, your reporting activities should be proportionate. For SMEs in particular, the scope and content of your communication and reporting activities should not impose a disproportionate administrative burden in your supply chains or on companies with reporting obligations. The term 'proportionate' means achieving a balance between the resources and costs involved in obtaining information and the benefit of that information to your target groups. It follows that the scope and detail of an enterprise's human rights reporting should reflect the level of risk of adverse impacts due to its business activities, its potential causal contribution to human rights violations, its ability to exert influence over remedy and the complexity of different stages of its own value chain. In some cases, there may be a correlation between the size of an enterprise and its risk exposure. For example, large enterprises are more likely to source materials from higher-risk countries, and their supply chains tend to be more complex. However, size is not the only factor that determines the scope of your communications and reporting. The single most important criterion is the scale of any adverse impacts on human rights.

When is the right time for communications and reporting?

According to the NAP requirements, you must adopt a regular schedule of public reporting if there is a particularly high risk of your business activities causing adverse impacts. The precise timing and the periods covered by your reports will initially depend on the reporting format. For example, if you communicate information on your enterprise's own human rights impacts as part of the (integrated) management report, you must report annually and within a certain period after the end of your financial year. However, if you choose instead to communicate the information in a voluntary sustainability report (possibly using a suitable reporting framework) or in a dedicated human rights report, you are free to decide on a suitable time and reporting period as long as you comply with the statutory frameworks.

Regulatory requirements also play a role. At present, capital market-oriented enterprises that meet certain size criteria are required to publish an annual non-financial statement (sections 289b and 315b of the German Commercial Code, HGB). The future Corporate Sustainability Reporting Directive (CSRD) will extend this obligation to SMEs under certain conditions. Enterprises to which the LkSG applies must report annually on the fulfilment of their due diligence obligations. This must take the form of a separate external report to be published no later than four months after the end of the financial year. As long as the content of this report is auditable, it may also be used for your (statutory or voluntary) sustainability and financial reports.

Your enterprise is free to decide whether, when and for which periods you employ other communication formats alongside your reports. Your website, dialogue events and other formats may also be appropriate, especially when it comes to more dynamic communication on recent developments and events, or if you want to establish two-way information sharing.

Which enterprises are covered by reporting obligations?

According to Germany's CSR Directive Implementation Act (CSR-RUG), capital market-oriented enterprises of a certain size must disclose specific information about their observance of human rights (sections 289b and 315b HGB). The new Corporate Sustainability Reporting Directive (CSRD) is likely to extend reporting obligations to more enterprises and impose more extensive requirements for sustainability reporting. According to the LkSG, enterprises that meet certain size criteria, regardless of their legal form, must keep an ongoing internal record as evidence that they fulfilled their due diligence obligations in the last financial year and must publish an external report once a year. Enterprises may also be subject to local statutory requirements outside Germany, e.g. under the UK Modern Slavery Act, the Australian Modern Slavery Act, the US California Transparency in Supply Chains Act, the US Dodd-Frank Act, the Corporate Duty of Vigilance Law in France, the Dutch Due Diligence Act on the Prevention of Child Labour and the EU Conflict Minerals Regulation.

The disclosure obligations imposed by these laws do not always match the NAP's reporting and communication requirements. To a large extent, however, these statutory requirements are based on the UN Guiding Principles, which means there is likely to be a great deal of overlap between the NAP and national laws. It follows that you can harness synergies by using the information you compile in line with NAP requirements to help you meet other statutory obligations. Furthermore, work is currently in progress to harmonise non-financial reporting requirements and integrate them into existing (financial) reporting formats. In future, these efforts will provide greater clarity in relation to reporting obligations of this kind.

Keep your stakeholders informed about current developments

The recommended approach is to produce reports for stakeholders at regular intervals, i.e. at least every two years or, even better, once a year. That will help you to continuously update your own due diligence processes, manage human rights risks more effectively, define your objectives and better fulfil the requirements of your business customers. Annual reporting is recommended in cases where a high risk of adverse human rights impacts has been identified.

Overview of disclosure requirements in reporting

	NAP	CSR-RUG[5]	Supply Chain Act (LkSG)
Reporting obligation	No, but recommended for enterprises whose activities pose a particularly high risk of adverse impacts	Yes, for capital market-oriented enterprises, banks and insurers that meet specific size criteria	Yes, for all enterprises regardless of their legal form – from 2023: enterprises with at least 3,000 employees in Germany (including employees on international secondments) – from 2024 the threshold will fall to 1,000 employees
Where to publish	Free choice	Corporate website and/ or as part of (or together with) the management report in the Federal Gazette	Corporate website and digital submission to the Federal Office for Economic Affairs and Export Control
Format	Free choice	Optional Integrated into management report – Separate section of management report – Integrated into another existing report – Separate report	Separate report
Option to integrate into existing reports	Yes	Yes	No
Cycle	Regular intervals and ad hoc	Annual	Annual
Time and length of publication	Ad hoc	No later than four months after the year-end reporting date and for at least ten years	No later than four months after the end of the financial year and for seven years

[5] The CSR Directive Implementation Act obliges certain enterprises to publish a report on non-financial issues, including respect for human rights. It will be replaced by the CSRD from 2024.

Sustainability reporting frameworks

Although there are overlaps between statutory reporting obligations and voluntary reporting standards, there is currently no harmonised Europe-wide or global approach. It is therefore advisable to continuously monitor your statutory reporting obligations in order to be able to meet regulatory requirements.

With regard to voluntary sustainability reporting, there are various recognised frameworks whose requirements for reporting on the observance of human rights vary in scope. Enterprises can build on these frameworks and use them as a guide to human rights reporting. However, you must ensure that you provide the information required by the NAP (see step 1 of this guideline).

In Germany, enterprises mostly base their reports on the requirements of the German Sustainability Code (DNK) or the Global Reporting Initiative (GRI).

Since 2018, the DNK has included an option to disclose additional information in line with the NAP. This option was introduced to help enterprises identify information that they have already compiled for the DNK and that also contributes to the NAP requirements (see the comparison of DNK and NAP). By contrast, the GRI has its own dedicated standards addressing human rights issues. For example, GRI standards 406–411 cover child labour, forced labour and the rights of indigenous groups. In the US, the standards established by the Sustainability Accounting Standards Board (SASB) are often used as the starting point for sustainability reporting. While the SASB also includes requirements for human rights reporting, its focus is on disclosures linked to financial performance.

You don't have to start from scratch – use existing standards as a guide in your own reporting.

Links to further information

DNK-NAP

- Using the Sustainability Code to report on corporate due diligence obligations

GRI standards

- GRI 406 Non-discrimination
- GRI 407 Freedom of association and collective bargaining
- GRI 408 Child labor
- GRI 409 Forced or compulsory labor
- GRI 410 Security practices
- GRI 411 Rights of indigenous peoples

4.2 Step 2 – Decide which contents will go into your report

It is advisable to set up your external reporting system in such a way that you can supplement your regular scheduled reports with ad hoc communications (e.g. in case of relevant events, new information, allegations or requests) and fulfil your regulatory obligations. The format, timing and reporting period may vary, but to meet the NAP requirements you should ensure that you document the following information on your due diligence processes internally and include it when you produce external reports.

Human rights issues with serious implications

Regular risk analyses allow you to identify and assess the actual and potential adverse impacts of your activities on human rights across your supply and value chain. Once you have identified any human rights issues with serious implications, you are required to document them internally and include them in your external reports. If there is a long gap between your risk analysis and the publication of your report, there is a risk that your findings may be out of date. In such cases, you should review the risk analysis and update it if required.

Corruption and breaches of human rights due diligence obligations

The fight against corruption and bribery plays an important role in wider efforts to respect human rights. As shown in various studies, for example by Transparency International, human rights violations and corruption occur more frequently, for example, in states where the rule of law is lacking, institutions are weak and poverty is endemic. Potential human rights risks in such countries include damage to the health or safety of workers and the local population, discrimination, restrictions on freedom of association and violations of indigenous peoples' rights.

With regard to human rights due diligence processes, it is recommended that enterprises observe the following:

- As part of their human rights risk analysis, enterprises should be aware that corruption and bribery can be an indication of human rights violations.
- When developing rules and processes designed to ensure respect for human rights, you should consider measures to fight corruption and bribery as a cross-cutting task.
- Enterprises should integrate anti-corruption measures into their business processes and impose anti-corruption requirements across their supply chains. If you have not yet established processes of this kind at your enterprise, the expansion of your existing due diligence processes provides a good reason to do so and an opportunity to harness synergies.
- With regard to implementation, the recommended approach involves close collaboration between the compliance department and the various divisions and departments responsible for observing human rights.

Some examples of further reading on this subject: Corruption as a Violation of International Human Rights, research paper by Prof. Dr Anne Peters, in European Journal of International Law, Volume 29, Issue 4, November 2018, Pages 1251–1287, Published: 14 February 2019; Integrating Human-Rights in the Anti-Corruption Agenda, a study by the International Council on Human Rights Policy in collaboration with Transparency International, 2010; Corruption and Human Rights: Making the Connection, a study by the International Council on Human Rights Policy in collaboration with Transparency International, 2009.

As a general rule, your report should specify all human rights that are being or could be undermined in connection with your own business activities or your business relationships. It should also highlight which human rights are most at risk. These are often referred to as 'salient' human rights issues.[6] Given the complexity of automotive value networks, you may come across a large number of potential human rights issues. As long as you provide good reasons for doing so, you can limit your reporting initially to the potentially most severe adverse impacts and concentrate on those problems you identify as most widespread across your sites or in your value chain. If you choose to prioritise these risks in your report, you must offer a clear justification, e.g. by referring to your risk analysis findings.

In the unlikely event that you conclude (based on your risk analysis) that there are no human rights risks, you will need to provide plausible and credible evidence to back this up in your report. (The guideline for the core element 'Risk analysis' explains the risk analysis process and the severity criterion in full detail.)

Risk analysis

Explain the process and the criteria you have adopted to identify and assess adverse impacts on human rights. You should also describe the role of senior management. Your assessment criteria should include severity (i.e. the extent of any impairment of human rights, the number of actually or potentially affected persons and the possibility of redress), the probability of occurrence and your contribution to the underlying causes. Make sure that you prioritise severe human rights risks. The probability of certain human rights violations occurring, and the degree to which your enterprise may have caused them, will also determine which measures you specify and implement. It is important to note, however, that you are still required to address unlikely severe impacts at some point.

Your risk analysis should reflect the perspective of those who are or could be affected by adverse impacts. With this in mind, you should ensure that your reports also explain how and to what extent the views of stakeholders, particularly those of (potentially) affected groups, were obtained and considered during the process. In cases where rights holders require protection, your enterprise must treat the information they provide as confidential and make this clear in its reports.

Measures and remedial action

Describe the measures you have implemented to prevent and remedy potential and actual human rights risks and violations at your own sites and across your supply and value chains. Define the categories of stakeholders for which your enterprise plans to offer redress and take remedial action. You can also explain the challenges that need to be overcome in order to implement those remedial actions and provide redress.

For example, the Supply Chain Act (LkSG) requires enterprises to set out measures that fulfil their own due diligence obligations, respond to any reported grievances and implement the commitments made in their policy statement.

Typical examples of measures for prevention and remedy

- Guidelines and provisions in contracts
- Training at your own sites and in your supply chain to raise awareness and support the implementation of due diligence processes
- Conduct audits, and negotiate and implement remediation plans
- Establish and maintain a dialogue with civil society groups and international organisations
- Involvement in sector initiatives

The guideline for the core element 'Measures and effectiveness tracking' explains in detail the steps you need to follow when implementing your measures.

[6] Based on Shift & Mazars LLP (2015): Salient Human Rights Issues, https://www.ungpreporting.org/resources/salient-human-rights-issues/

Human rights reporting frameworks

The UN Guiding Principles Reporting Framework by Shift and Mazars is recommended as an introduction and guide to corporate human rights reporting. Its concise answers to key questions provide clear and straightforward guidance while also highlighting common ground with other frameworks.

The initiatives Corporate Human Rights Benchmark and Know the Chain are based on the UN Guiding Principles and can also be used by enterprises looking for guidance on reporting. They perform external assessments of the reports produced by enterprises with regard to their human rights due diligence processes and make the information available and accessible to a wider public.

Grievance procedures

Explain the processes you have set up to manage reports about human rights violations. First, you will need to describe the formal and informal channels and mechanisms that people within and outside your enterprise can use to report concerns, grievances and abuses. These may include internal and external contact points and reporting channels, e.g. an external lawyer to act as an ombudsperson, an online reporting platform, and options to submit information by letter, phone or email. You should also explain how you will deal with incoming reports and how your enterprise will protect those who submit them from any retaliation, e.g. reprisals in the form of workplace exclusion. For example, you could explain the steps that need to be followed when processing any information you receive about human rights, the escalation mechanisms you have put in place, and how you will maintain anonymity and confidentiality. Second, you are also expected to identify trends and patterns in the results and findings of your grievance procedures, and to outline what lessons have been learned and what measures taken. This might include adapting your internal guidelines and processes, training certain employees and further developing your supplier management system. (The guideline for the core element ‘Grievance mechanism’ explains in detail the steps you need to follow in order to implement appropriate grievance procedures.)

Disclosing specific examples

Specific examples of severe or systematically occurring (potential) adverse impacts can serve to illustrate your enterprise’s basic approach to human rights issues. At your discretion, you may choose to aggregate and anonymise the information. You should always ensure that affected persons or groups are protected. You can demonstrate that your due diligence processes are working properly by reporting proactively on cases that involve severe impairment of human rights caused by your enterprise, illustrating the remedial action you are taking and describing the impact of your measures. This could include cases of which you became aware through your grievance mechanisms, press reports or studies, and which you have since examined and addressed through appropriate measures. Examples of this kind in your reports also serve as evidence of the measures you are taking to fulfil your due diligence obligations. As such, they should not be regarded as a form of self-disclosure.

Choose examples that illustrate the human rights issues you are addressing in a way that is as representative, understandable and balanced as possible.

Wherever possible, you should be proactive in addressing human rights incidents, especially in significant cases. For example, you may become aware through your grievance mechanisms that one of your suppliers discriminates against women or that people living near production sites are complaining about health problems due to contaminated surface water. In response, without going into details or identifying any individuals, you could explain in your communications how you found out about the situation and what measures you have taken as a result (e.g. training within your supply chain, agreement with suppliers on a corrective action plan, insistence that suppliers comply with established requirements). By contrast, a purely reactive approach to such impacts could be detrimental to your enterprise if the information becomes public.

If your enterprise has provided redress for human rights violations during the reporting period (e.g. compensation payments or rectification of any damage to vital natural resources), you should explain what remedial action you took, either by reporting on a specific case or by describing in anonymised form your general procedure for a number of similar cases. The second of these approaches is particularly advisable where disclosure would threaten the human rights of stakeholders or where you need to observe specific confidentiality obligations. In such cases, it is important to explain your reasons for publishing a redacted, aggregated or anonymised report (e.g. the threat of reprisals against complainants who believe that the political situation also presents a risk to human rights, for instance in countries with authoritarian regimes).

Deciding whether to report on negative cases and specific grievances can present your enterprise with a dilemma. On the one hand, transparent reporting can enhance the credibility of your reports. At the same time, however, it may expose you to criticism. You cannot resolve this dilemma by simply reporting on positive achievements. For internal and external stakeholders, this approach is often not credible. You should instead choose examples that illustrate the human rights issues you are addressing in a way that is as representative, understandable and balanced as possible.

Conflicting business objectives (optional)

Your human rights reporting should be proactive, balanced and transparent. With this in mind, it is advisable to report openly on how your enterprise manages conflicting objectives. These can arise in various scenarios, for example when opening up new markets or business areas, developing new products, working with new suppliers or joint venture partners, or introducing new value creation processes.

There is no need to disclose your current specific corporate objectives or any internal conflicts, as doing so may reveal sensitive information. You goal here should rather be to explain the mechanisms you have put in place to help resolve any conflicts between your business objectives on the one hand and your measures to prevent or mitigate adverse human rights impacts on the other.

What are the processes involved in reaching a decision in such cases? What are the relevant criteria and internal guidelines? Who is involved in making the decisions? Equally, there is no need to set out in detail any cases where measures you have taken to observe human rights could threaten other human rights.
A better approach is to use anonymised examples to illustrate the processes and decision-making strategies or simply to describe how those mechanisms work in theory. For example, you could explain the processes and rules you would follow if your enterprise wanted to break into an economically promising new market that is also well known for disregarding certain human rights.

In such cases, it is more about highlighting the general processes involved in dealing with conflicting goals than providing the 'right' answer to a dilemma.

Your reports should also make clear that decisions often involve weighing up a number of options. For example, if national legislation in the source country does not provide the level of protection needed to uphold the labour standards you have established for yourself and your suppliers, you should specify how you can nevertheless observe and enforce your requirements. Enterprises make a valuable contribution through their business relationships, the associated value creation, and through capacity-building measures, especially in developing countries and emerging economies. They can use their influence and resources to help improve the human rights situation. If you find yourself weighing up different options, it is therefore advisable to consider every possible way in which you can improve the local situation first of all, rather than withdrawing from business relationships or entire markets. In particular, you should support the efforts of your business partners and of both government and non-government actors in the country concerned to help bring about a lasting improvement in the human rights situation.

Engagement before disengagement – how can you help to improve the situation in areas where human rights are at risk?

The study **“Engagement before disengagement – an approach supporting due diligence?”** (in German only) by the consulting firm Löning – Human Rights & Responsible Business was commissioned by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH. It addresses the challenges and opportunities created by establishing business relationships in developing countries and emerging economies. As well as exploring relevant factors that lead enterprises to withdraw from a market or business relationship, the study highlights alternative measures.

Similar guidance is offered in the discussion paper **Should I Stay or Should I Go?** by the Centre for Research on Multinational Corporations (SOMO). This paper aims to facilitate structured decisions on how best to improve or terminate business relationships in the human rights context.

Reviewing effectiveness

To fulfil your responsibility to respect human rights, you must continuously review the effectiveness of your measures, grievance mechanisms and redress procedures. That involves disclosing how you evaluate the effectiveness of your measures within your enterprise, how you monitor your progress and what you learn from each review. To systematically assess the effectiveness of your measures, it is helpful to include both a qualitative description and quantitative indicators. Indicators can often be subject to different interpretations. For example, a reduction in the number of complaints submitted may point to improvements in the supply and value chain or may reveal a weakness in your grievance mechanisms.

It is therefore recommended that you explain the wider context of the qualitative and quantitative indicators in your reports to ensure that the implications and any changes are communicated in a comprehensible manner. Where applicable, depending on your reporting obligations, you may also need to ensure that they are presented in a form that can be externally audited.

Reviewing effectiveness takes up time and resources. You will therefore need to choose processes and indicators that measure success in a way that is appropriate to your business activities and the context in which you operate. The guideline for the core element ‘Measures and effectiveness tracking’ details the steps involved in reviewing effectiveness. It also includes a list of possible indicators that you can use to present how effective your due diligence processes are.

Include a brief outlook if indicators are not yet in place

If you have only just started implementing human rights-related processes, it is likely at first that you will not be able to use indicators to report on your effectiveness tracking. In such cases, it is advisable to provide an outline of your planned steps and the associated timeframe.

How to differentiate between types of indicators that you can use to assess your due diligence processes

- Indicators that show whether due diligence processes have been implemented within the enterprise or in your supply and value chain (e.g. number of locations certified, percentage of employees who have completed training, number of suppliers audited, number of grievances received)
- Indicators that show whether due diligence processes are effective at preventing or mitigating adverse human rights impacts or reducing the probability of occurrence (e.g. number of actual cases of discrimination, percentage of barrier-free work areas, worker health and safety indicators, number of temporary workers receiving company social benefits, percentage of workers who are unionised, survey results to measure satisfaction levels among employees, local residents and local communities)

Step 6 of the guideline for the core element 'Measures and effectiveness tracking' explains how indicators can be incorporated into due diligence processes.

4.3 Step 3 – Define your target groups

It is important to precisely define your target groups before you start processing the information you have compiled. This will enable you to present and communicate it in a form that meets their respective needs. Although the target groups for your formal reports will be quite narrowly defined, which means you can address them through the same channel(s), the groups you will want to target using other communication formats will be much more diverse.

Formal reports are primarily aimed at investors, civil society, customers and (potential) employees.
The following target groups can be distinguished for your other communication formats (see also the 'Policy statement' guideline):

- people who are required to implement human rights due diligence processes (e.g. employees, suppliers and your contractors' employees);
- people with a direct interest in the implementation of your measures or to whom you need to provide specific documentary evidence (e.g. your supervisory board, top management, company employees, investors, business partners, civil society organisations, government bodies);
- potentially affected rights holders (e.g. local communities, particularly vulnerable groups, trade union members and customers).

4.4 Step 4 – Establish your communication and reporting processes

Many enterprises have already established communication and reporting processes to meet their stakeholders' information needs. You can also draw on the results of human rights due diligence activities in other management areas, e.g. risk analysis, grievance procedures and effectiveness reviews. (These steps are detailed in the guidelines for the core elements 'Risk analysis', 'Measures and effectiveness tracking' and 'Grievance mechanism'.) If possible, rather than establishing separate or additional reporting processes, you should therefore use (and, if necessary, adapt or expand) your existing processes in order to meet the following requirements.

Define roles and responsibilities

Overall responsibility for reporting should lie with senior management or supervisory bodies involved in the relevant topic. To ensure that all the information is properly collated, you should formally designate roles and responsibilities for the entire process. You will need to involve those departments and units within your enterprise that have the required expertise and that control information in particular areas. Their task is to ensure that information is fully and clearly documented and assigned to the correct period, i.e. the current reporting year. Ideally, there should be a designated employee at your head office responsible for coordinating the enterprise’s internal record-keeping obligations and for its communication and reporting processes. That person will manage the process of reaching agreement on your external communications and liaise with colleagues in specialist roles. The coordinator must also ensure that the information for the reporting year is presented in a form that meets the requirements and any statutory reporting obligations. Good internal coordination is all the more important if you choose to split these responsibilities between various departments and positions in your enterprise.

Formalised processes will make your reporting easier

Clearly worded instructions for the reporting process (e.g. as part of an internal guideline) will help you to produce a steady flow of comparable data. To this end, the corresponding process description should cover the following points: roles and responsibilities (including deputisation arrangements), timeframes and deadlines, documentation and retention periods, specifications for conducting and documenting internal controls, plans for approving the release of information, formally established definitions for any indicators being compiled and guidance on the processes and methods to be used to compile and validate information.

Ensure that the information in your reports is of the required quality

Before including information in your reports, you should check that it is complete, accurate, up-to-date and appropriate. This may involve multiple checks by different people. Compiling data for your indicators can sometimes be particularly complex. To avoid mistakes, it is therefore advisable to validate the data at different levels and at relevant points (in your IT system). You should also perform sufficient quality checks on the information in your other communications. However, detailed internal controls are less critical here than for your external reports.

Insight into corporate practice: BMW Group’s Integrated Group Report

BMW Group published its first voluntary Integrated Group Report for the financial year 2020, combining the previous Annual Report and Sustainable Value Report. The report examines the Group’s environmental and social contributions alongside its financial performance. ‘As a premium manufacturer, we seek to set a good example for the industry and take responsibility. Key sustainable development indicators are given equal weighting in our reporting with financial figures,’ observed BMW Group CFO Nicolas Peter. The report sets out all the Group’s current sustainability goals alongside important milestones, improvement measures and remedial actions. Major challenges arose due to the complexity of the topics and their scope, as the combined management report aims to cover all relevant aspects in full without making the report too long and detailed.
The long version of this **good practice example** is available online.

Identifying key issues

When preparing a sustainability report, start by identifying issues that are material and therefore subject to reporting obligations. There are various definitions of the term 'materiality' in relation to statutory reporting obligations and voluntary reporting standards. Accordingly, enterprises that use recognised frameworks or statutory requirements as the basis for their human rights reporting must ensure in particular that they fully cover all the points required by the NAP.

In practice, the coverage of relevant human rights issues in some company reports is brief and at times insufficient. For example, a **study by Transparency International Germany** (in German) concluded that the sustainability reports of some major German enterprises were inadequate in terms of their GRI coverage of anti-corruption and anti-bribery measures. Among other findings, it highlighted the need for more detailed and more comprehensive presentation of relevant information.

The reporting framework for the UN Guiding Principles on Business and Human Rights points out that human rights issues with serious implications can remain at least partly hidden if enterprises adopt a 'materiality' approach focused primarily on the information needs of the target group and the impact on the enterprise's results rather than on rights holders. The UNGP make clear that the principal responsibility of enterprises in this area is to address human rights risks. Against this backdrop, the materiality assessments conducted by enterprises do not always adequately reflect actual human rights risks and violations.

- According to the **GRI** requirements, issues are material if they 'reflect the organization's significant economic, environmental and social impacts' or 'substantively influence the assessments and decisions of stakeholders'.

- Under Germany's CSR Directive Implementation Act **(CSR-RUG),** issues must be included in the report if they are 'necessary for the understanding of the business performance, the business result, the position of the joint-stock company and the impacts of its activity'. It is anticipated that the **CSRD** will broaden the scope of the term to establish a double materiality requirement.

- The focus of the **NAP** is on reporting human rights risks. To comply with NAP requirements, you must therefore ensure that your reports set out all the actual and potential impacts of your business activities on human rights and your procedures for addressing them – regardless of their significance for stakeholder decision-making or their contribution to an understanding of your business performance. In terms of presentation, you can apply the 'hierarchy of information' principle. This means that an enterprise can determine its own reporting priorities and highlight trends and patterns (see step 1). (The guideline for the core element 'Risk analysis' details the steps involved in risk analysis and explains how to identify relevant human rights issues.)

4.5 Step 5 – Prepare the information to meet the needs of each target group

To ensure that your communications meet the needs of the target groups you identified in step 2, you will need to decide on an appropriate reporting or communications format, the appropriate language and the scope and complexity of the information. The key factors to consider are whether the data are understandable, comparable, clear, easy to locate, auditable and material. In terms of content, your reports and communications should focus on information related to the actual and potential impacts of your business activities on human rights and describe your procedures for addressing those impacts.

The goal is for your target groups to understand your business activities and the corresponding human rights impacts. They should also be able to gain a rough idea of your enterprise’s structure and operating environment so that they can interpret your due diligence processes and the outcomes of your measures. With this in mind, make sure that you distinguish between factual information and opinion, and between statements about the future and the past.

You should also ensure that the information you present in your reports is balanced. That means you need to include both positive and negative aspects. Choose a reporting format with a clear structure and clearly divided sections. Diagrams and other visual content can help to make the text more readable. They also enable readers to locate important information more quickly.

Reporting and communication format. You have some discretion over the choice of reporting format, subject to certain statutory obligations. According to the CSR-RUG and LkSG, for example, certain enterprises must report annually in a specific form (see ‘Overview of disclosure requirements in reporting’ in step 1). To avoid redundancy, it is advisable to either incorporate your human rights information into existing reports (e.g. your annual report, non-financial report, sustainability report or the enterprise’s website), or publish a separate report on respecting human rights that includes links to relevant sections of existing reports.

Regular external reporting is also recommended for enterprises that are not subject to statutory reporting obligations. It demonstrates to the wider public that your due diligence processes are transparent and that you are taking responsibility for respecting human rights. The most important goal of your communications and reporting is for the information to reach and be understandable to the identified target groups. This is essential as it allows those groups to reach an informed view about your enterprise’s human rights impacts and due diligence processes. If possible, the information should therefore be made available in the language of each target group and should be presented at a level of complexity that matches the assumed knowledge of that group. As shown below, other formats may be suitable for communication purposes alongside your formal reports.

Internal communications (selection):

- Your enterprise’s own intranet
- Internal publications and electronic circulars
- Internal dialogue formats

External communications (selection):

- Your enterprise’s website
- Press reports and interviews with relevant media
- Social media posts
- Dialogue events with local communities, other rights holders and stakeholder groups
- Brochures distributed locally to target groups
- Communication campaigns aimed at end users

For external stakeholders, especially those in the value chain, or groups who may be adversely affected by impacts of your business activities as the reporting enterprise, it is important that wherever possible you work on your external communications together with other actors, e.g. non-governmental organisations, local communities, the representatives of (potentially) affected groups, sector initiatives and end users.

How to engage successfully with stakeholders

The UN Global Compact Network Germany and twentyfifty Ltd have published a guide entitled **Stakeholder Engagement in Human Rights Due Diligence** that offers advice on establishing good and effective ways of engaging rights holders. The guide is suitable for all five of the NAP core elements. It is practical and can be used by enterprises of all sizes.

4.6 Step 6 – Release and communicate the information

Once your enterprise has prepared the information and format for its internal and external communications and its reports, you should conduct a series of final checks to ensure that the content is accurate and appropriate. It is advisable to arrange for these checks to be performed by relevant internal bodies or senior managers. In many enterprises, responsibility for this step lies, for example, with the finance, communications, compliance or legal department, the sustainability area or the corresponding public relations officer. Key documents, such as the (integrated) company report and the non-financial or sustainability report, are usually approved for release by top management (once audited, if required). At this point, the released information must be made available internally (e.g. on your intranet) and externally (e.g. via your website). It is particularly important at this stage to ensure that your communications are consistent with your enterprise’s own human rights policy.

5. Monitoring your progress towards implementing the requirements

You can use the following list of criteria to check whether you have fully completed the steps and therefore fulfilled the NAP requirements for the core element 'Reporting'.

	Steps implemented to fulfil the NAP requirements for the core element 'Reporting'	Reference to step in the guideline
	As a prerequisite for good human rights reporting, the enterprise keeps internal records detailing its human rights risks and due diligence processes. This includes the following elements:	
☐	an overview of human rights problems with serious implications and of potentially affected groups;	
☐	the latest findings of a regularly updated risk analysis;	
☐	progress made towards implementing measures;	
☐	findings of reviews to evaluate the effectiveness of measures;	2
☐	changes in human rights impacts over time;	
☐	grievance mechanism structure, reports and findings;	
☐	further development of measures and grievance mechanisms based on the findings of effectiveness reviews.	
☐	A formal process is in place to regulate the internal review and approval of information before it is used in reports and communications.	6
☐	Clear lines of accountability and responsibility have been established for both ad hoc and regular communication and reporting.	4
☐	Information on human rights risks and due diligence processes is communicated on an ad hoc basis to relevant stakeholder groups (and, where applicable, to the public) in response to important changes and events and to external requests or allegations.	2
☐	The enterprise produces a publicly available report once a year if its activities entail a particularly high risk of adverse human rights impacts, or if the enterprise is subject to the LkSG. This report covers each of the elements listed above, together with a description of the enterprise's due diligence processes based on specific examples.	1, 2
☐	Different target groups have been defined for communication and reporting purposes.	3
☐	Relevant internal and external target groups are able to access the information contained in the enterprise's internal and external communications and reports.	5
☐	The information is set out in a form that can be understood by each target group and has been translated into a number of languages.	5
☐	The enterprise's communications and reporting are balanced, i.e. they reflect both positive and negative aspects in order to enable a well-informed judgement of its overall performance.	2, 5
☐	Reports are up to date and reliable, i.e. the information relates to the period under review, has been verified internally and, for example, externally audited.	4

6. Where can you find more information?

6.1 Further information

This guideline is a standalone document covering all the relevant steps you will need to implement in order to completely fulfil the NAP requirements for the core element 'Reporting'. In addition to this guideline and the other external documents cited so far, the following sources will help you acquire a deeper understanding of the subject.

Guidance on communications and dialogue

- **Stakeholder Engagement in Human Rights Due Diligence**, published by the UN Global Compact Network Germany and twentyfifty. This is a guide to engaging effectively with stakeholders in the area of human rights due diligence.
- **Corporate Human Rights Benchmark**. The CHRB ranks the human rights due diligence processes of enterprises using a dedicated methodology and externally available information. One of the main areas on which the benchmark focuses is the automotive industry.

Guidance on reporting

- The **UN Guiding Principles Reporting Framework**, produced by Shift and Mazars, is a comprehensive guide for enterprises to reporting on human rights due diligence.
- **Global Reporting Initiative (GRI)**, a comprehensive framework of standards for sustainability reporting. The GRI also covers other areas such as management approaches to human rights issues.
- **German Sustainability Code (DNK)**, the German framework for sustainability reporting. Management approaches to human rights issues are covered in a dedicated section.
- **The Communication on Progress in Brief**, by the UN Global Compact, is a website with resources to help enterprises prepare the UN Global Compact progress report, part of which addresses human rights issues.

Overview of rankings

- The Ranking of Sustainability Reports, produced by Germany's Institute for Ecological Economy Research (IÖW) in collaboration with the business initiative future e. V., is the most comprehensive regular and widely recognised study of CSR reporting by large enterprises and SMEs in Germany. The ranking includes supply chain issues and respect for human rights.

Self-assessment tools and information on human rights due diligence processes

- Know the Chain, by the Business & Human Rights Resource Centre, Humanity United, Sustainalytics and Verité. Drawing on externally available information, this resource assesses the progress made by enterprises towards implementing human rights due diligence processes. It has a special focus on forced labour and exploitation.
- CSR in Deutschland, an online platform operated by the Federal Ministry of Labour and Social Affairs (BMAS), with information on the NAP and LkSG, useful background information, a collection of general and industry-specific guides, advisory services, training courses and practical examples. The site includes a regularly updated list of answers (in German) to the most frequently asked questions about the LkSG.
- Human Rights Capacity Diagnostic, by the UN Global Compact Network Germany (in German), is designed to help enterprises assess their own capacity to manage human rights due diligence obligations. The short version is particularly suitable for SMEs. The diagnostic tool focuses attention on the enterprise's baseline and stimulates discussion on the best way forward.
- Human Rights Due Diligence Info Portal, set up by the UN Global Compact Network Germany, with information materials and tools to help enterprises design and improve their human rights due diligence processes. Some of the materials available are specifically geared to the automotive industry and SMEs.
- Business & Human Rights Resource Centre, an online platform providing a wide range of information materials on human rights issues in relation to business. A particular feature of the site is that it creates transparency and emphasises responsibility by publishing reports on human rights violations as well as company responses. Some of the materials relate specifically to the automotive industry.

Analyses of industry initiatives and sustainability reports from an NGO perspective

- Performance-Check Automobilindustrie: Verantwortungsvoller Rohstoffbezug? Eine Analyse von Industrieinitiativen und Nachhaltigkeitsberichten (Automotive industry performance check: responsible sourcing of raw materials? An analysis of industry initiatives and sustainability reports, in German)

6.2 Similarities and differences between the NAP and the LkSG

Both the NAP and the LkSG are based on the UN Guiding Principles (2011) as a reference framework. It follows that the steps set out in these guidelines for meeting the NAP requirements will also help you to fulfil the due diligence processes stipulated in the LkSG. Although the fundamental requirements of the NAP and the LkSG are comparable, the rights and obligations they establish are not identical, however.

One of the key differences between the two regulatory frameworks is that the NAP is voluntary, reflecting a basic expectation of the Federal Government that enterprises will take appropriate action to fulfil their responsibilities at every point in their supply and value chains. By contrast, the LkSG is mandatory for all enterprises that fall under its scope of application. It obliges them to meet clearly defined due diligence obligations in their own area of business and in their dealings with both direct and indirect suppliers.

This guideline is designed to help enterprises understand and implement generally accepted and appropriate due diligence obligations. With this goal in mind, it covers all the requirements of the NAP core element 'Reporting'. Additional references in this guideline to LkSG requirements also draw attention to the due diligence obligations imposed by the legislation. This will help enterprises that fall under the scope of the law to meet their statutory obligations at the same time. In certain areas, the guidelines go beyond the above policy frameworks and regulatory requirements.

The Federal Office for Economic Affairs and Export Control (BAFA) will assess each case individually to determine whether an enterprise is meeting the requirements of the LkSG. In deciding whether the measures taken are appropriate, it will consider the enterprise's specific business model. BAFA will publish information, aids and recommendations to facilitate compliance with the LkSG.

Section 3 of this guideline sets out both the NAP specifications and the LkSG requirements. The following overview illustrates which steps in the guideline can be used to help fulfil the LkSG obligations.

Step	Page	Corresponding NAP requirement[7]	Link to LkSG requirements
1) Lay the foundations	12	A, C, E	Section 10 (Documentation and reporting obligation) (1) and (2) Section 12 (Submission of the report)
2) Decide which contents will go into your report	16	A, B, C, D, E	Section 10 (Documentation and reporting obligation)
3) Define your target groups	21	B	Section 10 (Documentation and reporting obligation) (2) sentence 2 no. 2
4) Establish your communication and reporting processes	21	C, D	Section 10 (Documentation and reporting obligation) (1) and (4) Section 12 (Submission of the report)
5) Prepare the information to meet the needs of each target group	24	B, D, E	Section 10 (Documentation and reporting obligation) (2) to (4)
6) Release and communicate the information	25	D, E	Section 10 (Documentation and reporting obligation) Section 12 (Submission of the report)

[7] The NAP requirements are in alphabetical order as shown in section 3 of this guideline.

6.3 Glossary

Civil society organisations

See 'Non-governmental organisations (NGOs)'.

Conflict-affected and high-risk areas (CAHRAs)

This term applies to areas currently in a state of armed conflict or a fragile post-conflict setting. It also includes areas affected by weak or absent governance and security, and by widespread and systematic violations of international law and human rights.

Corruption

Criminological research defines corruption as the 'abuse of a public office, a position in the economic sector or a political mandate in favour of a third party, upon their instigation or one's own initiative to obtain an advantage for oneself or a third party, with the occurrence or in the expectation of the occurrence of damage to or a disadvantage for the general public (in official or political functions) or for an enterprise (if the offender holds a pertinent position in the economic sector)'.

Definitions of terms used in the Supply Chain Act

- In some cases, the LkSG sets out obligations that must be fulfilled annually and, additionally, '**on an ad hoc basis**'. In sections 5 (4), 6 (5), 7 (4) and 8 (5) LkSG, the obligation to meet a requirement on an ad hoc basis depends on whether the enterprise should expect a significantly changed or expanded risk situation in that area of its business. By contrast, with regard to the enterprise's due diligence obligations on the basis of '**substantiated knowledge**' [section 9 (3) LkSG], the requirement applies if the enterprise has actual indications that suggest that a violation of a human rights-related or environment-related obligation at indirect suppliers may be possible. If this is the case, the enterprise must take action on an ad hoc basis.
- Section 3 (1) sentence 1 LkSG states that enterprises must exercise due regard for the human rights and environment-related due diligence obligations set out in that division of the Act which relate to their supply chains, with the aim of preventing or minimising human rights or environment-related risks or of ending the violation of human rights-related or environment-related obligations. Section 3 (2) LkSG sets out criteria for determining whether actions to fulfil due diligence obligations are appropriate. This depends on:
    - the nature and extent of the enterprise's business activities;
    - the ability of the enterprise to influence the party directly responsible for a human rights or environment-related risk, or for the violation of a human rights-related or environment-related obligation;
    - the severity of the violation that can typically be expected, the reversibility of the violation, and the probability of the occurrence of a violation of a human rights-related or an environment-related obligation;
    - the nature of the causal contribution of the enterprise to the human rights or environment-related risk, or to the violation of a human rights-related or environment-related obligation.

According to the Federal Government's explanatory memorandum, all the due diligence obligations covered by the Act are subject to the general principle that the scale of the efforts to be made by an enterprise to prevent or end a violation should reflect its ability to exert influence, the likelihood and severity of the anticipated violation of a legal position and the extent of the enterprise's causal contribution. Equally, the importance of efforts to monitor the supply chain should reflect the degree to which the products and production sites associated with a business activity are vulnerable to human rights risks.

- The term '**own business area**' is defined in section 2 (6) as covering every activity of the company, as a legal entity representing the enterprise, to achieve the business objective. This includes any activity related to the creation and exploitation of products and services, regardless of whether it is carried out at a location in Germany or abroad. In affiliated enterprises, the parent enterprise's own business area includes a group enterprise if the parent enterprise exercises a decisive influence on the group enterprise.
- The term '**direct supplier**' is defined in section 2 (7) LkSG as any supplier or service provider with which the enterprise has a contractual relationship and whose supplies are required to produce the enterprise's product or to provide and use the relevant service.

- The term '**indirect supplier**' is defined in section 2 (8) as any enterprise which does not meet the definition for a direct supplier but whose supplies are nevertheless essential to the enterprise's activities. This includes all suppliers with which your enterprise is linked through contractual relationships, business activities, products or services even if there is no direct contractual relationship.

Excerpt from the NAP for the core element 'Reporting'

'Enterprises should keep information at their disposal and communicate it, where appropriate, to external recipients in order to demonstrate that they are aware of the actual and potential impact of their corporate activity on human rights and are taking appropriate steps to address the situation. The form in which this information is communicated should be tailored to its recipients. Enterprises whose business activity poses a particularly high risk of adverse impacts should issue regular public reports on that subject. Such reporting may be done in the framework of the company's existing reporting format or take the form of separate reports focused on human rights. At the same time, such reporting obligations should not impose disproportionate administrative burdens on the reporting companies or on the SMEs in their supply chains.'

Grievance mechanisms

In the context of this series of guidelines, the term grievance mechanism refers to any routine procedure, whether internal or cross-company, that can be used to submit complaints of human rights violations by the enterprise and to seek remedy.

Human rights

Human rights are fundamental rights held by all individuals regardless of any discrimination, e.g. on the grounds of nationality, place of residence, sex, national or ethnic origin, skin colour, religion, native language and other characteristics. They are brought together in key international standards. The goal of those standards is to ensure that all people worldwide are treated equally and with dignity. Among these rights are those set out in the United Nations International Bill of Human Rights and the fundamental rights established in the ILO's Core Labour Standards.

Human rights due diligence obligations and processes

Human rights due diligence obligations are those obligations which an enterprise must fulfil in order to satisfy its responsibility to respect human rights in its global supply and value chains. These obligations are specified in particular in the UN Guiding Principles.
Human rights due diligence processes constitute a continuous risk management process that enterprises must establish in order to identify, prevent, mitigate and provide redress for adverse human rights impacts and demonstrate accountability for the way they deal with such impacts. The five core elements of the NAP set out the main steps involved in fulfilling human rights due diligence obligations.

Human rights impacts (adverse, severe)

Adverse human rights impacts occur when an enterprise directly or indirectly contributes to a situation in which individuals are prevented from exercising their human rights or restricted in the exercise of those rights. The focus of this concept is on the risk to the individual rather than the risk to the enterprise. However, there is a recognised correlation between the highest levels of risk to human rights and the risk to the enterprise. Adverse human rights impacts are assessed as severe if they meet the criteria for severity in terms of their scale, scope or irremediability.
These criteria may be fulfilled whether or not the enterprise is in a position to exert any influence on the situation. The potential severity of human rights impacts is specific to an enterprise's activities or business relationships and therefore varies between enterprises.

Human rights risks and risk analysis

The term 'human rights risks' refers to the potential adverse impacts of an enterprise's activities on human rights. They should always be understood as risks to those affected and not primarily as a risk to the enterprise itself. In order to assess such human rights risks, the enterprise should conduct a risk analysis. The purpose of the risk analysis is to identify and assess any actual or potential adverse human rights impacts with which the enterprise may be involved either through its own activities or as a result of its business relationships.

ILO Core Labour Standards

The ILO Core Labour Standards are eight conventions of the International Labour Organization (ILO) that provide a basic framework of global labour and welfare standards. They have the status of international legal instruments and are therefore binding on all states that have ratified them. The eight conventions are: Convention No. 87 – Freedom of Association and Protection of the Right to Organise (1948), Convention No. 98 – Right to Organise and Collective Bargaining (1949), Convention 29 – Forced Labour (1930), Convention 105 – Abolition of Forced Labour (1957), Convention 100 – Equal Remuneration (1951), Convention 111 – Discrimination (Employment and Occupation) (1958), Convention 138 – Minimum Age (1973) and Convention 182 – Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999).

International human rights reference instruments

International human rights reference instruments are agreements under international law, conventions, regulations, policies, guidelines, standards and other provisions designed to promote CSR in the area of human rights. These documents serve as an important point of reference for a shared understanding of human rights, and an obligation to respect them.

International law

International law is a supranational legal system imposed by states on themselves as subjects of international law. Among the main sources of international law are the United Nations International Bill of Human Rights, bilateral and multilateral agreements under international law, customary international law and court rulings. Enterprises are not subjects of international law and are not directly bound to observe international law agreements. Nevertheless, within their own context and in accordance with the UN Guiding Principles, they are obliged to respect the human rights specified in international treaties.

Local communities

In the context of human rights due diligence, the term 'local communities' is used for communities that are located in close proximity to the sites operated by business enterprises or that are or could be directly impacted by the activities of those sites. Such impacts can be positive (e.g. job creation) or negative (e.g. groundwater pollution). Local communities are not necessarily homogeneous. In most cases there are overlaps with indigenous communities and vulnerable individuals.

Mitigation measures

The term 'mitigation measures' refers to all measures that can be taken to reduce the scale of actual adverse human rights impacts or the probability that potential adverse human rights impacts will occur.

National Action Plan for Business and Human Rights (NAP)

The NAP was established by the German Federal Government to implement the UN Guiding Principles. It was adopted by the Federal Cabinet in 2016. This is the first time that the German Federal Government has embedded the responsibilities of German enterprises to respect human rights into an established framework (the Action Plan). In the NAP, the Federal Government sets out its expectation that enterprises must exercise their human rights due diligence obligations and respect human rights at all points in their supply and value chains. The NAP consists of five 'core elements': a human rights policy statement, procedures for the identification of actual or potential adverse impacts on human rights, measures to ward off potential adverse impacts and reviews of the effectiveness of these measures, reporting and a grievance mechanism.

Non-governmental organisations (NGOs)

The term 'non-governmental organisations' is used for non-state organisations, institutions, associations, foundations and other private bodies that are not run for profit and whose purpose is to contribute to the common good in the broadest sense. NGOs may operate locally, regionally, nationally and even internationally. As such, the term includes both local civil society organisations and national and international NGOs. Church-based aid agencies, organisations that form part of the solidarity movement and foundations linked to political parties are also classed as NGOs. NGOs can pursue a wide range of interests. For the purposes of the UN Guiding Principles, enterprises and business associations are not treated as NGOs.

OECD Guidelines for Multinational Enterprises

The OECD Guidelines for Multinational Enterprises are recommendations by the Organisation for Economic Co-operation and Development (OECD) to states and enterprises. Their purpose is to promote sustainable business activity in global supply and value chains. They include recommendations on transparency, working conditions, the environment, corruption, consumer protection, reporting, technology transfer, competition and taxation.

Preventive measures

Preventive measures are measures designed to ensure that adverse human rights impacts do not occur.

Remedial measures

This term is used to describe both the processes by which actual or imminent adverse human rights impacts are ended and those which are intended to provide redress for those violations. Remedial measures and redress may take various forms, such as ending the violation, an apology, the restoration of rights, rehabilitation, financial or non-financial compensation, follow-up measures (e.g. criminal penalties against individuals or sanctions under administrative law, for example a fine imposed on the enterprise in question), a temporary legal remedy or a guarantee of non-recurrence.

Redress

See 'Remedial measures'.

Rights holders

This term includes all people irrespective of their personal characteristics. In this series of guidelines it refers mainly to persons and groups who may potentially be affected by human rights violations ('potentially affected groups/individuals').

Stakeholders

Stakeholders are individuals or organisations that have actual or potential influence over the activities and decisions of an enterprise or that are or may be influenced by those activities and decisions.

United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles)

The UN Guiding Principles are a framework of 31 principles that set out requirements for political and business actors. As such, they are the first generally recognised reference framework for the human rights obligations of states and the responsibilities of enterprises in global supply and value chains. The UN Guiding Principles are based on three 'pillars': the duty of the state to protect human rights, the responsibility of business enterprises to respect human rights, and access to remedy for those affected by human rights violations. The Guiding Principles were adopted in 2011 by the United Nations Human Rights Council.

United Nations human rights treaties

The UN human rights treaties are binding agreements under international law. They apply in those states that have signed and ratified the treaties. The UN's human rights treaties are listed below: International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT), Convention on the Rights of the Child (CRC), International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICMW), Convention on the Rights of Persons with Disabilities (CRPD), International Convention for the Protection of All Persons from Enforced Disappearance (CPED).

United Nations Universal Declaration of Human Rights

The Universal Declaration of Human Rights was adopted by the United Nations General Assembly on 10 December 1948. As a resolution of the General Assembly, it is not legally binding. However, it is regarded as part of customary international law. The Universal Declaration sets out the fundamental rights held by all people regardless of their origin, religion, sex or other characteristics. It forms part of the United Nations International Bill of Human Rights, which also includes the International Covenant on Civil and

Political Rights (Civil Covenant), the International Covenant on Economic, Social and Cultural Rights (Social Covenant) and their respective Optional Protocols.

Value chain

An enterprise's value chain comprises all the activities linked to the manufacture, sale, use and disposal of its products or to the delivery of its services. In addition to its business activities, the enterprise's value chain therefore includes other enterprises with which it has a direct business relationship, enterprises in its direct and indirect upstream supply chain (right up to the procurement of raw materials), its customers and any downstream business partners providing disposal services. Business support functions also form part of the value chain, e.g. investment and financing activities.

The automotive industry's value chain is characterised by dynamic supplier networks based on reciprocal relationships between suppliers and customers. This means that indirect suppliers in particular can change frequently and in many cases are not known to the procuring enterprise. Furthermore, individual enterprises in the value chain can act simultaneously as each other's suppliers and customers for different products.

Vulnerable groups

For the purposes of the UN Guiding Principles, vulnerability is a measure of both the extent to which a group is vulnerable to adverse human rights impacts as a result of a business activity, and of how it can overcome those impacts. Accordingly, vulnerable groups may experience adverse human rights impacts not only as a result of a specific business activity, since these impacts can be exacerbated by any existing cultural, social, environmental, political or economic disadvantages affecting those groups.

6.4 List of sources

Business & Human Rights Resource Centre, ‘Business & human rights snapshot: Automotive sector’,
https://media.business-humanrights.org/media/documents/files/BHRRC_AutomotiveSector_OCT2018.pdf

Corporate Human Rights Benchmark Ltd, ‘Corporate Human Rights Benchmark Methodology 2020. For the Automotive Manufacturing Industry’,
https://assets.worldbenchmarkingalliance.org/app/uploads/2021/03/CHRB2020MethodologyAutomotive-Manufacturing.pdf

Council of Europe, ‘European Convention on the Recognition of the Legal Personality of International Non-Governmental Organisations’,
https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=124

Ernst & Young et al., ‘NAP-Monitoring – Begriffserläuterungen zum Fragebogen für die repräsentative Erhebung 2020 (Glossar)’ (in German),
https://wirtschaft-entwicklung.de/fileadmin/user_upload/5_Wirtschaft_und_Menschenrechte/Downloads/200319_Glossar_Fragebogen_Final_DEU.pdf

European Center for Constitutional and Human Rights, Glossary entry ‘Universal Declaration of Human Rights’,
https://www.ecchr.eu/en/glossary/universal-declaration-of-human-rights/

Federal Agency for Civic Education, ‘NGOs – Nicht-Regierungsorganisationen’ (in German) (2017),
https://www.bpb.de/nachschlagen/zahlen-und-fakten/globalisierung/52808/ngos

Federal Foreign Office on behalf of the Interministerial Committee on Business and Human Rights, ‘Implementation of the UN Guiding Principles on Business and Human Rights’ (2017),
https://www.auswaertiges-amt.de/blob/610714/fb740510e8c2fa83dc507afad0b2d7ad/nap-wirtschaft-menschenrechte-engl-data.pdf

Federal Government, Act on Corporate Due Diligence Obligations in Supply Chains (2021),
https://www.csr-in-deutschland.de/SharedDocs/Downloads/EN/act-corporate-due-diligence-obligations-supply-chains.pdf?__blob=publicationFile

Federal Ministry of Labour and Social Affairs, ‘Die Achtung von Menschenrechten entlang globaler Wertschöpfungsketten. Risiken und Chancen für Branchen der deutschen Wirtschaft’ (in German) (2020),
https://www.bmas.de/SharedDocs/Downloads/DE/Publikationen/Forschungsberichte/fb-543-achtung-von-menschenrechten-entlang-globaler-wertschoepfungsketten.pdf?__blob=publicationFile&v=1

Federal Ministry of Labour and Social Affairs, FAQs: Frequently asked questions about the NAP,
https://www.csr-in-deutschland.de/EN/Business-Human-Rights/NAP/nap.html

German Institute for Human Rights, ‘Vorläufige Stellungnahme im Rahmen der Verbändeanhörung zum Referentenentwurf des Bundesministeriums für Arbeit und Soziales. Entwurf eines Gesetzes über die unternehmerischen Sorgfaltspflichten in Lieferketten vom 28. Februar 2021, (in German) (2021),
https://www.bmas.de/SharedDocs/Downloads/DE/Gesetze/Stellungnahmen/sorgfaltspflichtengesetz-dimr.pdf?__blob=publicationFile&v=2

Human Rights Reporting, Assurance Framework Initiative (RAFI), supported by Shift and Mazars, UN Guiding Principles Reporting Framework (2015),
https://www.ungpreporting.org/wp-content/uploads/UNGPReportingFramework_withguidance2017.pdf

International Labour Organization, ILO Declaration on Fundamental Principles and Rights at Works, **https://www.ilo.org/declaration/lang--en/index.htm#:~:text=freedom%20of%20association%20and%20the,of%20employment%20and%20occupation%3B%20and**

International Labour Organization 'Applying and Promoting International Labour Standards' , **https://www.ilo.org/global/standards/applying-and-promoting-international-labour-standards/lang--en/index.htm**

Office of the High Commissioner for Human Rights, Guiding Principles on Business and Human Rights. Implementing the United Nations "Protect, Respect and Remedy" Framework (2011), **https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf**

Office of the High Commissioner for Human Rights, The Corporate Responsibility to Respect Human Rights. An Interpretive Guide (2011), **https://www.ohchr.org/Documents/Issues/Business/RtRInterpretativeGuide.pdf**

UN Global Compact Network Germany, 'Five Steps towards Managing the Human Rights Impacts of Your Business', **https://www.globalcompact.de/migrated_files/wAssets/docs/Menschenrechte/Publikationen/5_steps_towards_managing_the_human_rights_impacts_of_your_business.pdf**

Imprint

Publisher:
The Federal Ministry of Labour and Social Affairs
Division VI b 3 "CSR – Corporate Social Responsibility", D-11017 Berlin

Status: June 2022

If you want to place an order:
Order no.: A 433e-6
Telephone: +49 30 18 272 272 1

In writing:
Dispatch of the Federal Government
PO Box 48 10 09
D-18132 Rostock
Email: publikationen@bundesregierung.de
Internet: www.bmas.de

Deaf and Hearing Impaired Services:
Email: info.gehoerlos@bmas.bund.de
Sign language telephone: www.gebaerdentelefon.de/bmas

Editorial team: Mirjam Kolmar, Dr Jana Heinze
Design: Scholz & Friends Reputation
Typesetting/layout: metagate GmbH
Photos: iStock by Getty Images
Printing: Federal Ministry of Labour and Social Affairs Press, Bonn

If you would like to cite this publication, please cite the publisher, title and publication status.