Integrating and Acting

What do the UN Guiding Principles Expect?

To address negative human rights impacts, businesses should:

- Integrate the findings from their impact assessments across relevant internal functions and processes;
- Act to prevent and mitigate the impacts identified; and
- Have the internal decision-making, budget allocation and oversight processes in place to enable effective responses.

Why is this Important?

- Through the process of "integration" a company can take the findings from its assessment of impacts, identify who in the company needs to be involved in addressing them, and work with them to decide on an effective response.
- It is through the actions it takes to prevent or mitigate impacts that the company actually reduces its impacts on people: this is central to achieving respect for human rights.

What are the Steps Involved?

A. Building a Systematic Approach to Integrating and Acting
B. Prioritising Impacts for Action
C. Identifying Options to Prevent or Mitigate Potential Impacts
D. Creating and Using Leverage in Business Relationships
E. Acting in High-Risk Contexts
Building a Systematic Approach to Integrating and Acting

Key Points for Implementation

- If a company has strong systems in place to respond to potential human rights impacts, it is more likely to manage these risks effectively and reduce its actual impacts on people.
- If these processes are weak, action is more likely to be ad hoc, to miss some risks altogether and to fail to contribute to sustainable improvements over time.

Possible Approaches

- **Site-level and corporate level action**: Action to address potential human rights impacts is typically best decided at the site level in order to ensure it is tailored to local needs and realities. In some instances, it may be valuable or even necessary to involve individuals from the corporate/head office (and/or regional) level in decisions, or to get their agreement, for example where the human rights impacts are particularly severe and require an immediate response.

  The corporate/head office level may play an important role also in sharing experiences across sites of how to address certain kinds of impact. In this way, options that have been successful in one context can be considered in others. It may be useful periodically to bring together the staff who work on these issues at different sites to share their experiences directly. This can support the spreading of best practices. It may also point to common challenges that suggest a need for new or amended guidance from the corporate/head office level.

- **Integrating key staff into decisions on how to address impacts**: Individuals who are responsible for assessing human rights impacts — whether at the site or corporate/head office level — often have limited contact with the staff responsible for the activities or relationships that can contribute to impacts. Yet those closest to the impacts need to be involved in identifying and implementing solutions; otherwise they may not be sustainable. In smaller companies, day-to-day communication may be enough to achieve this integration. In larger companies, it can require a more systematised approach. This may include:

  - Developing structured cross-functional decision-making groups;
  - Including staff from relevant departments in discussions with external experts on specific challenges;
  - Having clear internal reporting requirements on the implementation of decisions;
  - And in the case of high-risk contexts or severe impacts:
    
    > Involving relevant staff from across the business in discussions with affected stakeholders on how to address impacts;
    
    > Involving senior management in decision-making and oversight.
Prioritising Impacts for Action

Key Points for Implementation

- In some instances, resource constraints will mean that a company needs to prioritise which impacts it will address first.
- Prioritisation should depend first and foremost on the severity of the impacts on human rights. An assessment of severity should also take into account the perspectives of those who may be impacted.

Possible Approaches

- **Focusing on the risk to human rights:** Traditional prioritisation or “heat mapping” of risks rates the severity (or “consequence”) of impacts in terms of the risk they pose to the company. For human rights due diligence, severity is about the risk posed to human rights.

- **Understanding severity:** In some cases, it will be clear which impacts are potentially severe based on their:
  - **Scale:** How grave the impact is - for instance impacts on the right to life or to the health and safety of individual workers;
  - **Scope:** How many people are or will be affected - for example impacts on the livelihoods of entire communities, or the freedom of association of an entire workforce;
  - **Irremediable nature:** Whether it will be difficult or impossible to restore the people impacted to a situation that is equivalent to their situation before the impact - for example where religious and cultural heritage of indigenous peoples has been destroyed.

In other cases, O&G companies may find it useful to engage with affected stakeholders or their representatives to understand fully how severe impacts might be in practice.

- **Mapping severity and likelihood to identify priorities:** The other relevant factor for prioritising action is the likelihood of an impact. The likelihood of an impact may be increased by:
  
  (a) the local operating context(s) where the particular impacts may occur, as well as

  (b) specific business relationships that may be involved.

In traditional risk prioritisation, a risk that is low severity but high likelihood would have a similar priority to a risk that is high severity but low likelihood. However, in the case of human rights risks, a “high severity-low likelihood” impact takes clear priority.

Figure 2: Human Rights Risk Map for Prioritising Action
In addition, while it may seem simplest to prioritise action on those impacts where the company has greatest leverage, in the context of human rights, it is the severity of impacts that should set priorities; leverage becomes relevant only in then considering what can be done (see Section III-D).

Prioritisation is a relative concept. This means that once the most severe potential impacts have been prevented or mitigated, the next most severe impacts need to be dealt with, and so on through all the impacts identified. Of course, different individuals or functions/departments within the company may be able to address different risks in parallel.

• Addressing different levels of risk: Companies may still need to know which risks to address first within each level of severity, starting with those in the most severe category. The logical starting point will be with those impacts that are most likely. Companies may also wish to take account of where they are most able to achieve change. Where these judgements are particularly difficult it may be helpful to discuss or test proposed approaches with expert stakeholders.

Example: Local Procurement

Where procurement laws or practices are weak, local procurement processes can suffer due to lack of transparency, corruption or nepotism. This can be a particular risk where companies are under pressure to meet local content targets. Online procurement is a way to reduce direct interactions with suppliers at critical points, thus avoiding corruption and enhancing transparency.

One oil and gas company developed an e-procurement system for use in an African country of operations. The system is specifically geared towards the needs of SMEs, so as to increase local participation in their supply chains. The system includes mapping of local SMEs to enhance outreach; a rating system to assess SME competency; public workshops to communicate uniformly to the contractor market; access to information technology; training and skills enhancement and access to finance.

Identifying Options to Prevent or Mitigate Potential Impacts

Key Points for Implementation

To identify the best ways to address potential impacts, a company first needs to understand the nature of its involvement:

- Where the company is at risk of causing an impact, it should take the necessary steps to prevent the impact from occurring.
- Where the company is at risk of contributing to an impact, it should first take steps to avoid this contribution. Where it does not control those who may contribute to the impact, it should use its leverage with them to mitigate the remaining risk.
- Where a negative impact may be directly linked to the company’s operations, products or services through a business relationship, even without a contribution by the company itself, it should use whatever leverage it has to mitigate the risk that the impact occurs.

Possible Approaches

• Addressing impacts the company may cause or contribute to: Structured assessment processes such as SIA/ESIA/ESHIAs typically result in a series of actions that should be taken to address the impacts identified. These are often reflected in a formal action plan that sets out specific steps and timelines, and assigns accountability and budgets. O&G companies will find it helpful to address human rights impacts in the same way to ensure that they are integrated into company processes for implementation and accountability.

O&G companies may find themselves facing difficult decisions on how to respond to some human rights risks. For example:
An action to reduce the risk of human rights impacts on some stakeholders may create risks for others. For example, relocating communities to a site that is closer to alternative jobs but further from water sources may mitigate risks to livelihoods and work but increase impacts on women who have to fetch water. One solution may be to make water sustainably available at the new site.

An action to reduce the risk to one human right may increase the perceived risk to another. For example, involving women or young people in consultation processes may be seen as a threat to local indigenous traditions and cultures. One approach can be to consult with both women and local male leaders on the design of projects that gradually raise women's awareness and voice.

Addressing such risks requires a full understanding of the issues and an ability to work with this complexity. It is not an option simply to assume that an increase in respect for one right cancels out reduced respect for another right. Instead, efforts must be made to address all the impacts, while recognising that perfect solutions may not exist.

In some cases there will be examples within the industry of how to manage these tensions successfully. Where examples are not available, or not appropriate to local circumstances, it can be particularly beneficial to involve local experts in discussions on how to respond. Depending on the issues, it may be possible to involve representatives of affected stakeholder groups, whether workers or communities, in seeking a collaborative solution that also reflects their ideas and preferences.

- **Addressing impacts that are linked to the company’s operations, but without any contribution on its part:** Negative impacts can be directly linked to an O&G company’s operations even when it has not caused or contributed to them. Another business or a government may impact human rights when providing goods, services or other operational needs to the O&G company. For example, if the staff of the company’s security provider harass or sexually abuse local women, or if a contractor retains the passports of migrant workers and they are placed in a position of bonded labour, this kind of “direct linkage” to the O&G company occurs.

  In this situation, the Guiding Principles make clear that the company should take reasonable steps to prevent or reduce the risk of these impacts recurring. The main means of doing so will lie in the company’s leverage over those who caused the abuse. Approaches to creating and using leverage are discussed in Section III-D below.

- **Addressing impacts from the earliest stages:** O&G companies have traditionally paid less attention to dealing with potential human rights impacts at the exploration stage of projects than they do during later stages such as construction and production. They may be concerned about raising local community expectations about a potential project, or under pressure to reduce the costs of exploration. However, this can be a false economy. A lack of due diligence can lead to negative impacts that create a legacy of poor relationships with communities. The company – or any other company to which it sells its rights – then has to address these impacts at a later stage, when it will be considerably more difficult to do so.

  Possible approaches to prevent and mitigate impacts at the exploration stage include:

  - Working to ensure that company budgets and timelines for preventing or remediating any impacts include those that may arise during exploration;
  - Undertaking joint efforts with companies on neighbouring exploration blocks to engage with affected communities. This could include not only jointly explaining the implications for communities if exploration is successful, but also instituting a shared grievance mechanism from an early stage;
  - Addressing compensation needs and claims during exploration in a rigorous and prompt manner, and ensuring that issues relating to security are managed in line with the Voluntary Principles on Security and Human Rights;
  - Making clear to third-party exploration companies that the effectiveness of how impacts are prevented or mitigated will influence how projects are valued at the time of acquisition; and then working with internal teams dealing with M&A, negotiations and due diligence, to reflect this in company decisions;
  - In the case of exploration companies, explaining and illustrating the value that their work to mitigate human rights impacts should represent to a purchasing company.
Creating and Using Leverage in Business Relationships

Possible Approaches

The terms of contracts and other project-related agreements, such as Memoranda of Understanding (MOUs), play a critical role in defining leverage in a company’s relationships. This is true across relationships with governments, joint venture partners, suppliers and contractors.

- **Leverage with governments:** International O&G companies often have to negotiate agreements with host governments. The Principles for Responsible Contracts, developed by the former UN Special Representative, provide valuable guidance on steps to ensure these agreements enable respect for human rights. Many of the same steps could be applied to other agreements, such as the negotiation of MOUs with public security forces or the terms of land acquisition and resettlement processes.

Where governments are unwilling to include human rights provisions in agreements, companies need to look for other avenues to introduce these issues, such as through operating procedures, MOUs with security forces, capacity building of operating staff and through continued engagement with the government on human rights issues.

Resources: The Principles for Responsible Contracts

The Principles for Responsible Contracts were developed under the mandate of the former Special Representative of the UN Secretary-General for Business and Human Rights. They identify 10 Principles to help states and business investors integrate the management of human rights risks into investment project contract negotiations. The principles cover:

1. Project negotiations preparation and planning
2. Management of potential adverse human rights impacts
3. Project operating standards
4. Stabilisation clauses
5. “Additional goods or service provision”
6. Physical security for the project
7. Community engagement
8. Project monitoring and compliance
9. Grievance mechanisms for non-contractual harms to third parties
10. Transparency/Disclosure of contract terms

Key Points for Implementation

- The Guiding Principles define “leverage” as the ability of a company “to effect change in the wrongful practices of an entity that causes harm”; in short, its ability to influence the behaviour of others.
- Leverage does not determine whether a company has responsibility for an impact: responsibility results solely from the company’s involvement with the impact through cause, contribution or “linkage”.
- Leverage is relevant for identifying ways to address those impacts identified. Companies should use their leverage to try to change the behaviour of any business partners involved. If a company lacks leverage there may be ways to increase it.
- If it proves impossible over time to achieve change through their leverage, companies should consider ending the relationship in question, taking into account:
  - Credible assessments of any negative impacts from doing so;
  - That the more severe the abuse, the more quickly the business will need to see change before it decides whether to end the relationship.
- If a company stays in a business relationship with risks of severe impacts – for instance where it concludes no reasonable alternative exists – it will need to:
  - Be able to show how it is trying to mitigate the risks;
  - Be prepared to accept any consequences of the continued relationship (whether legal, reputational, financial).
O&G companies may also find it helpful to include references to widely recognised standards in agreements with a government or joint venture partner, such as the IFC Performance Standards, the Voluntary Principles on Security and Human Rights, or the legal standards in core ILO Conventions. These can provide clear and agreed reference points for the conduct of the project. O&G companies working in the same country may also be able to engage the government collectively in discussions on the human rights risks of natural resource exploitation.

National O&G Companies often have particular leverage with the government when they are operating in their home state. They may be able to use this to reduce human rights risks, for example by explaining the benefits of conducting land acquisition and stakeholder consultations in accordance with best practice. Where an O&G company uses its leverage to lobby a government on policy or regulatory measures, it will want to ensure that this:

- Is consistent with the company’s own responsibility to respect the human rights of workers and communities;
- Would not, in practice, undermine the state’s duty to protect human rights.

**Leverage regarding public security:** The Voluntary Principles on Security and Human Rights envisage a number of steps O&G and other companies can take to exercise leverage with regard to public security, including:

- Encouraging host state governments to allow security arrangements to be made transparent and accessible to the public, subject to any overriding safety and security concerns;
- Taking all appropriate and lawful measures, when providing equipment to public security, to mitigate any foreseeable human rights abuses and violations of international humanitarian law;
- Using their influence to promote the following principles with public security:
  a. Individuals credibly implicated in human rights abuses should not provide security services for companies;
  b. Force should be used only when strictly necessary and to an extent proportional to the threat;
  c. The rights of individuals should not be abused while exercising the right to freedom of association and peaceful assembly, the right to engage in collective bargaining, or other related rights of company employees as recognised by the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work;
- Holding structured meetings with public security on a regular basis to discuss security, human rights and related workplace safety issues;
- Consulting regularly with other companies, host and home state governments, and civil society to discuss security and human rights;
- Considering raising concerns with the host and home state governments collectively with other companies operating in the same region with the same concerns;
- Promoting observance of applicable international law enforcement principles in their consultations with host state governments, particularly those reflected in the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms;

**Example: Stabilisation Clauses**

Research was conducted under the mandate of the former Special Representative of the UN Secretary-General for Business and Human Rights into the ways in which so-called “stabilisation clauses” in Investor-State Agreements (sometimes called “Host Government Agreements”) could either exempt investors from compliance with new laws passed by a host state government designed to promote environmental, social or human rights goals, or entitle investors to be compensated for the costs of complying with them.

One O&G company was criticised by civil society groups for the terms of the stabilisation clauses in its contracts with states through which a planned pipeline would pass. These clauses were seen as undermining the willingness and ability of the host states in question to fulfill their human rights duties regarding issues such as non-discrimination, the human rights of workers and the protection of the environment. The company responded by amending the contracts via an additional document signed by the company. This made clear that the company would not interpret or use the stabilisation clauses in such a way as to undercut the host states’ ability to regulate human rights and improve human rights protection in line with internationally-recognised human rights.

They then made similar amendments to contracts underpinning another pipeline project in the same region.
Supporting efforts by governments, civil society and multilateral institutions to provide human rights training and education for public security as well as their efforts to strengthen state institutions to ensure accountability and respect for human rights.

- **Leverage with private security providers:** The Voluntary Principles on Security and Human Rights propose that companies working with private security providers should seek to:
  - Include specific standards, where appropriate, in the terms of their agreements with private security providers;
  - Ensure that private security personnel are adequately trained to respect the rights of employees and the local community;
  - Include in agreements requirements for the investigation of unlawful or abusive behaviour and appropriate disciplinary actions;
  - Ensure that agreements permit termination of the relationship where there is credible evidence of unlawful or abusive behaviour by private security personnel.

- **Leverage in joint ventures (JVs):** Where an O&G company is entering into a joint venture, there are a range of ways in which it can generate leverage, such as:
  - Seeking to enter into JVs with “like-minded organisations” where that is possible;
  - Influencing how the JV is structured, for example by:
    - Selecting a lead operator that is committed to respecting rights;
    - Integrating respect for rights into the terms of the JV contract (including clauses defining standards to be followed and provisions for monitoring and reporting);
    - Seeking financing from an institution that requires its clients to meet certain social and environmental standards, which therefore have to be integrated into the project management;
    - Seeking majority ownership.

Where the company is a minority partner, it may seek also leverage through other routes such as:

- Securing a Board position;
- Seeking special voting provisions on issues that raise significant human rights risks (such as land acquisition, security or emergency situations);
- Securing a senior management role with responsibility for social/human rights issues;
- Seconding staff to other key functions (such as health and safety, or audit);
- Seeking provisions in the JV contract for periodic assessments of the project, including its social, environmental and human rights performance, by an independent third party;
- Integrating discussions on how to manage human rights impacts into key technical meetings.

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**Example: Collaborative Action**

In one high-risk country, the government invited foreign companies to bid for the right to explore oil and gas blocks. Interested companies jointly asked the government to revise its bidding procedures to include minimum standards relating to transparency and the management of environmental and social impacts. The government agreed to postpone the bidding to review its procedures, and re-asserted its commitment to international standards of transparency.

Several factors assisted the companies in exercising leverage over the government, including:

- The government was demanding a production sharing contract and partnership with the state-owned NOC. However, concerns had been raised in the international media about corruption and human rights abuse linked to the NOC.
- The government was seeking to diversify its existing base of investors; and had itself committed to increasing transparency; and
- Many of the companies were subject to reporting requirements related to transparency and human rights impacts by their home governments.
• **Leverage with contractors/suppliers:** An O&G company’s contractors and suppliers have their own responsibility to respect human rights throughout their operations. However, if they are unable or unwilling to meet that responsibility, any resulting human rights impacts may be directly linked to the O&G company’s operations. Approaches to avoid this situation can include:
  - Pre-screening contractors and suppliers on the basis of their commitment and capacity to respect internationally-recognised human rights;
  - Identifying respect for human rights as a condition in tenders and contract renewals;
  - Inserting language into contracts that requires compliance with the company’s policy commitment, with internationally-recognised human rights, or with other codes or principles that are aligned with them;
  - Addressing any particular risks from the behaviour of on-site contractors, including security providers, by including their staff in training wherever possible;
  - Committing to increased prices or sustained/increased future business in recognition of good human rights performance;
  - Engaging with suppliers about the extent to which the company’s own purchasing practices may support or hinder them in meeting their responsibility to respect human rights, and addressing any negative incentives they may create;
  - Helping contractors develop their own knowledge and systems to ensure respect for human rights;
  - Providing feedback and mentoring when problems are initially identified, rather than simply “black-listing” the relevant business;
  - Making clear, if practices do not change, what the consequences may be, including a more public expression of concern or even termination of the relationship.

• **Leverage with local contractors/suppliers:** Host government agreements with International O&G Companies, their requirements of National O&G Companies, or those companies’ own practices may require certain levels of “local content” – meaning contracts that must go to local suppliers or a percentage of the workforce that must be hired locally. This can be important in providing local jobs, growth and development opportunities. It may also bring increased human rights risks if local businesses lack the awareness or capacity to ensure their own operations respect human rights.

Developing and implementing an effective local content strategy requires intensive internal engagement and buy-in. It may be necessary to amend existing procurement strategies and systems. It will be important to work closely with suppliers, contractors and local communities more broadly.

• **Leverage through persuasion:** Company efforts to exercise leverage through persuasion will be important at all levels, for example between a site-level security manager and public security forces, and between senior management and the government. This can happen through both formal and informal communication channels.

It may be useful to seek out opportunities to explain and illustrate the business case for respecting human rights to partners, for instance in terms of the significant costs of increased conflict with local communities.

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**Example: Leverage in Joint Ventures**

One O&G company considering a joint venture to conduct exploration in a challenging context insisted on accompanying the proposed JV partner into the field. The company spent a day “shadowing” the potential partner’s management and community relations team in the exploration block as they engaged with local indigenous communities. It was able to see for itself the potential partner’s approach to community engagement and to show them the importance of this issue to its decision on entering the JV. It also wanted to demonstrate to the local communities its intention to enter into a relationship based on mutual respect.

The company decided to enter into the JV as a minority partner. It wrote into the contract a requirement that 100% of the shareholders vote on issues that posed heightened risks to human rights, specifically any decisions being taken on resettlement or agreements with the state for the provision of security. (The requirement for other issues was that 60% of shareholders vote.) The company then incorporated this approach into its internal guidance for contract negotiators and applied it to other joint ventures.

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**Example: Including Social Commitments in Agreements with Contractors**

One oil and gas company has a process for ensuring that social commitments are embedded in contracts and to enhance contractor capacities. Bidders submit a preliminary Social Management Plan (including plans for community engagement, grievance resolution, resettlement, local hiring, impact mitigation, monitoring and reporting). After contracts are awarded, contractors are assisted in finalising the plan. Workshops and training are also offered. Contractors must have community liaison officers or social focal points. They must also ensure their contracts with their own sub-contractors include the same social requirements. Company social experts work with contractors to support them in meeting their commitments.
due to human rights impacts. In some cases it may be possible to form a joint steering committee with the host government to address specific issues, such as government implementation of the Voluntary Principles on Security and Human Rights or good practices in revenue transparency.

### Possible Approaches

- **Operating where governments systematically fail to protect human rights:** Under the Guiding Principles, companies are expected, wherever possible, to respect internationally recognised human rights as well as comply with national law. Where national law and international human rights conflict, companies should respect the principles of internationally recognised human rights to the greatest extent possible in the circumstances. They should also be prepared explain their efforts to do so.

  Where national law appears to conflict with internationally-recognised human rights, an O&G company’s assessment processes should identify this risk. The company should then actively explore the extent of the conflict, for example by:

  - Seeking clarification from the government;
  - Challenging the relevant provision where that is feasible;
  - Learning from what peers have done.

  As O&G companies consider how they might best honour the principles underlying internationally-recognised human rights, it will often be helpful to discuss the challenges with external experts, and where possible with affected stakeholders or their representatives, to gain their perspectives on any proposed approaches.

- **Preparing for dilemma situations:** The more an O&G company has prepared staff for dealing with dilemmas through training, scenarios, “lessons learned” exercises and similar approaches, the better prepared it will be in to respond to challenging situations. It might:

### Key Points for Implementation

- The responsibilities of companies with regard to human rights do not increase in high-risk contexts, but the challenges of fully meeting those responsibilities often do.

- Home states have a particularly important role to play in supporting companies operating in situations of heightened risk to human rights, including by providing adequate assistance to their efforts to assess and address these heightened risks.

- Companies should pay particular attention to any risk of causing or contributing to gross human rights abuses, which may also have legal implications for the company.
– Provide specific guidance on heightened risk situations, such as resettlement processes, compensation schemes, or engagement with indigenous peoples;

– Back this up by specialist support when a particular dilemma situation is triggered, for example by sending corporate-level experts to accompany field staff through the process;

– Give a cross-functional group of staff responsibility for identifying situations of heightened risk and developing appropriate strategies.

• Operating in conflict-affected areas: The Guiding Principles make clear that some of the worst human rights abuses involving companies happen in the context of conflict, latent conflict or fragile states. Governments are often least able or willing to meet their own duty to protect human rights in these situations, and may even be involved in human rights abuses.

Particular strategies will be needed to manage risks in these contexts. They might include:

– Paying increased attention to inclusive mapping of potentially affected stakeholders and conducting more extensive stakeholder engagement;

– Developing a close understanding of the conflict’s history and dynamics, beyond the region around the project site;

– Assessing whether any company decisions or actions may exacerbate conflict;

– Using credible third parties to help assess human rights risk and monitor the company’s performance;

– Ensuring the company’s systems are able to capture and respond to unpredictable, rapidly-changing risk levels;

– Increasing senior-level engagement in the risk management process;

– Providing increased transparency regarding the company’s efforts to address human rights risks, where this can be done without exacerbating the situation.

Example: Addressing Human Rights Issues as a Condition to Signing Government Agreements

Discussing legacy issues, especially those related to conflict, humanitarian crises or pandemics, can be sensitive for host governments in their dealings with O&G companies. Governments may fear implying that they accept certain responsibilities that could then be used against them. At the same time, O&G companies need to understand any risks that their exploration and production activities may aggravate an often complex set of pre-existing human rights issues.

Several O&G exploration companies entering a post-conflict zone secured an agreement from the government to have an independent third party clear land mines, as a pre-condition to starting operations. Another company sought an independent human rights risk assessment that included HIV-related issues, before signing a contract with the government. The assessment led the company to adopt a more stringent code of conduct with contractors. In both cases the companies were able to address the risks by demonstrating the benefits this would bring to the government as well.
Where to Start

For companies that are just starting to focus on integrating and acting, the following are some preliminary steps to consider:

- Bring a group of colleagues from relevant parts of the company together to discuss the potential impacts you have identified.
- Discuss with them which are most severe in terms of the impact on human rights and plot them on a heat map to identify priorities.
- Review industry-specific guides and talk with industry colleagues for ideas on how to prevent and mitigate your priority risks.
- Brainstorm ways you could increase leverage with business partners to address risks, including through the terms of contracts and agreements.
- Consider how responsibility for action would be most logically allocated within the company and seek support from those concerned.
Questions to Ask

The following questions correspond to sub-sections A, B, C, D and E above. They should help test the extent to which the company’s processes to integrate and act on the results of its assessments are consistent with the Guiding Principles:

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<td>3.</td>
<td>How do we prepare staff for handling dilemma situations and internalise any learning they offer?</td>
</tr>
</tbody>
</table>