

[INSERT COMPANY HEADER]

[NAME OF COMPANY]

Template Human Rights Policy (SME focused)

1 Our commitment to respecting human rights

- 1.1 We recognise that respect for human rights is a responsibility for business and exists independently of nation states' abilities and/or willingness to fulfil their own human rights obligations.
- 1.2 *[Insert company name]* is committed to respecting human rights in line with the [United Nations Guiding Principles on Business and Human Rights](#). We are committed to supporting and respecting all internationally recognised human rights as set out in the [International Bill of Human Rights](#) and the principles concerning fundamental rights in the [core International Labour Organization's \(ILO\) conventions](#) as set out in the [ILO's Declaration on Fundamental Principles and Rights at Work](#). The International Bill of Human Rights consists of the [Universal Declaration of Human Rights](#) and the main instruments through which it has been codified: the [International Covenant on Civil and Political Rights](#) and [the International Covenant on Economic, Social and Cultural Rights](#).
- 1.3 Our approach to human rights is also informed by the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) [and] *[insert any other international instruments/guidelines such as the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy]*.
- 1.4 [We are also a signatory to the [insert details of any human rights initiatives to which the firm is a signatory, e.g. the United Nations Global Compact]].
- 1.5 Specifically, *[insert company name]* is committed to ensuring that human rights are respected within its own operations and, as far as reasonably practicable, within its [direct] [supply / value chains – *note that value chain is much broader than supply chain and some human rights due diligence legislation will refer to value chain*].
- 1.6 We operate in an increasingly international business environment with complex value chains. We recognise that the activities associated with our own operations and/or those of our business partners could result in actual or potential adverse human rights impacts. However, *[insert company name]* is committed to avoiding infringing on the human rights of others, and to addressing adverse human rights impacts with which we are involved. *[Insert company name]* seeks to ensure we are not complicit in human rights abuses by any business partner or other person, organisation or government.
- 1.7 *[Insert company name]* appreciates that human rights due diligence is an ongoing process and is committed to continuous improvement. *[Insert company name]* is committed to taking appropriate measures to cease, prevent or mitigate and address identified actual or potential risks where possible.
- 1.8 [For the benefit of colleagues who may not have detailed knowledge of internationally recognised human rights standards, the company should give examples of rights that it is committing to respecting. The company could state, for example, that it is committed to providing safe and healthy working conditions, fair working hours and an inclusive culture free

of discrimination. It could also state what violations it prohibits, such as having zero tolerance for the use of forced, trafficked and child labour. The company could also consider cross-referring to any internal policies which might relate to human rights issues e.g. diversity and inclusion, health and safety, forced labour and modern slavery, responsible sourcing etc.]

2 Implementing our commitment to respecting human rights

- 2.1 We expect our colleagues, suppliers and other business partners to respect human rights in line with this policy.
 - 2.2 [Insert company name] is implementing our commitment to human rights by [include *high-level details of the activities the organisation is taking to support and respect human rights e.g. updating our human rights due diligence process to identify and assess actual or potential adverse human rights impacts which the company may be involved in [either directly or indirectly] through our own operations and the activities of our business partners*].
 - 2.3 We will take extra precautions where we conduct business in countries that have a heightened risk of actual or potential adverse human right impacts occurring. [Include *high-level details of the additional measures taken e.g. we conduct in-depth human rights assessments, consult with experts and directly engage with rightsholders in the relevant countries where possible.*]
 - 2.4 We pay particular attention and consider international standards relating to vulnerable individuals or groups that may be at greater risk of being affected by adverse human rights impacts.
 - 2.5 We aim to ensure that, where national laws differ from international human rights standards or our own policies and procedures, we will, so far as possible, follow the higher standard. If it is not possible to respect human rights fully in a particular context, we will respect them to the greatest extent possible in the circumstances.
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3 Stakeholder engagement

- 3.1 [Insert company name] recognises the importance of tracking the effectiveness of any action taken to address actual or potential adverse human rights impacts through the establishment of monitoring systems and continued stakeholder engagement. We value dialogue with our employees, suppliers, customers, communities, and other stakeholders, and are committed to engaging with stakeholders regularly as part of our human rights risk management process.
 - 3.2 [Add reference to any specific engagement process with stakeholders].
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4 Access to remedy

- 4.1 In line with the [UN Guiding Principles on Business and Human Rights](#), we work to ensure access to appropriate remedies for anyone who suffers an adverse human rights impact linked to our operations.
- 4.2 We encourage our colleagues and all external stakeholders to report any actual or potential violation of human rights caused or contributed to by our activities or our business relationships

as soon as possible in accordance with *[insert details of applicable reporting/whistleblowing procedures]*.

- 4.3 All concerns that are reported will be investigated and responded to. Reports can be made anonymously, and we strictly prohibit retaliation where reports are made in good faith.
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5 Scope of this policy

- 5.1 This policy applies to all persons working for us or on our behalf in any capacity including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 5.2 *[This policy's overarching principles apply to [and are embedded in] our business' policies and management systems]. We aim to ensure that all our policies and procedures convey a coherent message to those they apply to and reflect our stated commitment to support and respect human rights.*
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6 Governance

- 6.1 This policy has been developed in consultation with our colleagues and their representatives as well as external stakeholders including *[rightsholders OR subject-matter experts OR [other]]*.
- 6.2 The *[Board OR Senior management team OR ESG Committee OR [other]]* has overall responsibility for ensuring our commitment to respect human rights is put into practice and for the implementation of this policy.
- 6.3 *[Title of senior executive]* has day-to-day responsibility for the implementation of this policy *[and our business and human rights programme]* and for ensuring that any concerns reported are investigated. *[Title of senior executive]* will report to the Board at least once a year on *[insert company name]'s* progress towards meeting its human rights commitments.
- 6.4 All colleagues must be aware of, and adhere to, this policy. *[Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of in supply chains.]* Colleagues may be subject to disciplinary action if they fail to comply with the provisions of this policy.
- 6.5 We will review this policy regularly and at least *[annually / bi-annually]*. *[Insert company name]* will review this policy immediately where there has been a relevant significant change that may lead to new or emerging human rights risks. Any material changes made to this policy will be communicated to relevant stakeholders.
- 6.6 We will report on human rights impacts as part of our *[eg Annual Report]*. *[We are also required to publish a statement to meet the requirements of the UK Modern Slavery Act 2015]*.
- 6.7 This policy has been reviewed and approved by *[name of most senior level executive of the business e.g. CEO]*.
- 6.8 This policy is publicly available and has been communicated to all colleagues and relevant external stakeholders.

Date: [insert date of policy / last update of policy]

Drafting notes

Business organisations can, through their activities, have a significant effect, positive or negative, on individuals' human rights. The [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) which were adopted by the United Nations in 2011 laid down the principle that businesses have a responsibility to respect internationally recognised human rights. These are, at a minimum, the rights set out in the international texts referenced in paragraph 1.3 of the template below. This responsibility placed on businesses is considered to be a global standard of the conduct expected from all organisations wherever they operate, and is separate to any voluntary initiatives that your business may participate in, such as the [UN Global Compact](#) or the [OECD Guidelines for Multinational Enterprises](#).

In addition to the establishment of this global standard, some states have translated human rights obligations into national law that applies to business organisations, such as the UK's [Modern Slavery Act 2015](#) or the EU's [Corporate Sustainability Due Diligence Directive \(CSDDD\)](#). Investors are also increasingly conducting human rights due diligence on their investments in order to comply with their legal obligations and other voluntary standards. The Principles for Responsible Investment have issued [technical guidance on human rights due diligence for private markets investors](#), which also references the UNGPs.

A key feature of the UNGPs is the requirement for organisations to 'know and show' that they respect human rights, including by making a public statement of their responsibilities, commitments and expectations. Principle 16 of the UNGPs states that organisations should express their commitment to respect human rights through a statement of policy that:

- is approved at the most senior level of the business enterprise;
- is informed by relevant internal/external expertise;
- sets out the human rights expectations on staff, business partners and other parties directly linked to its operations, products or services;
- is publicly available and communicated internally and externally to all staff, business partners and other relevant parties; and
- is reflected in operational policies and procedures necessary to embed it throughout the organisation.

This template human rights policy can be used as a starting point for SMEs that are seeking to implement a human rights policy. It may be stand-alone or integrated into a broader statement on the organisation's ethical stance. The company will want to ensure that the principles of this policy are integrated throughout its other policies, including its Code of Conduct.

As a company develops its human rights risk management procedures, it should consider implementing a policy which outlines the company's approach to supply chain due diligence and/or responsible sourcing. It may also be pertinent to develop policies in relation to specific risk areas that impact the business such as the sourcing of minerals from areas of conflict. Companies should draw upon the [OECD Due Diligence Guidance for Responsible Business Conduct](#) (and any topic-specific guidance) when establishing supply chain due diligence policies and procedures. They should also consider whether they are likely to be impacted indirectly by any legislation on supply chain due diligence. Such legislation could result in due diligence requirements being cascaded along the supply chain.

This template policy does not comply with the requirements of the EU's CSDDD. If a company anticipates that it is likely to meet the relevant thresholds of the CSDDD (for two consecutive financial years running), it will need to adapt its policy to ensure that it meets the requirements of the CSDDD.

This policy should apply to, and be shared with, all staff. It should also be shared with the company's business partners and other external stakeholders where relevant. Companies that do not currently have human rights due diligence processes in place for their broader value chain should initially focus on identifying and

addressing human rights impacts within their own operations. Over time, companies can work to develop human rights due diligence processes and procedures which cover their wider value chain. Companies will need to determine whether the wording in square brackets is appropriate in the context of their business as it may not be reflective of the scope and extent of their human rights risk management procedures. The policy should include the requirements of Principle 16 of the UNGPs (listed above) as a minimum. The EU Commission has [published guidance](#) to assist SME's in complying with the requirements of the UNGPs.