



Annual  
report

2019



**OECD GUIDELINES**  
FOR MULTINATIONAL  
ENTERPRISES

NATIONAL CONTACT POINT  
FOR RESPONSIBLE BUSINESS  
CONDUCT NORWAY



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# Words from the Chair

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**In 2020, it will be 20 years since the National Contact Point system was introduced. This must be recognised and celebrated, but how far have we actually come?**

We live in a time where businesses are faced with strong expectations to take responsibility for their impact on people, society and the environment. The development has skyrocketed over the past decade. The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are at the essence of this development. Acknowledging that the Sustainable Development Goals cannot be achieved without the business sector respecting human rights and demonstrating responsible business conduct is one aspect of this.

Our survey from 2019 concerning the status for the implementation of the OECD Guidelines in Norwegian businesses shows that there is nonetheless a fair way to go. The business sector has little knowledge about the OECD Guidelines and it could be questioned just how deeply embedded due diligence really is. However, changes for the better are also taking place.

In the new Norwegian White Paper on State Ownership Policy from 2019, the Government is clear that state-owned companies must be at the forefront of the work on responsible business conduct, and that responsible conduct is a condition for the highest possible return *over time*. It is crucial that the state as owner now takes the lead and spearheads this work. The UN Working Group on Business and Human Rights also expects the state as owner to lead by example.

Many countries are establishing new and binding legislation on the basis of the OECD Guidelines and the UN Guiding Principles. The same is about to take place in the EU. The Ethics Information Committee's proposal for a new act regulating enterprises' transparency about supply chains, duty to know and due diligence will do the same in Norway. The OECD Guidelines and the UN Guiding Principles finding their way into binding legislation is an important and necessary development that will strengthen the effectiveness of expectations for responsible business conduct.

The National Contact Points (NCPs) have played, and continue to play, an important role in the work on promoting the OECD Guidelines. Since the very beginning, Norway's NCP has made active efforts to raise the profile of the Guidelines. Although we have come far in this process, much work remains. The annual report shows that Norway's NCP has been busy in 2019 and we are planning at least as much activity in 2020. However, we can only succeed if this work takes place in cooperation and interaction with others. Major government initiatives are still necessary, as are efforts on the part of businesses, trade unions and civil society.

Today, there are NCPs in 49 countries. The NCPs are also grievance mechanisms. Through the 20 years the system has existed, the NCPs have handled more than 500 cases. The grievance mechanism is unique and has led to some extraordinary results.



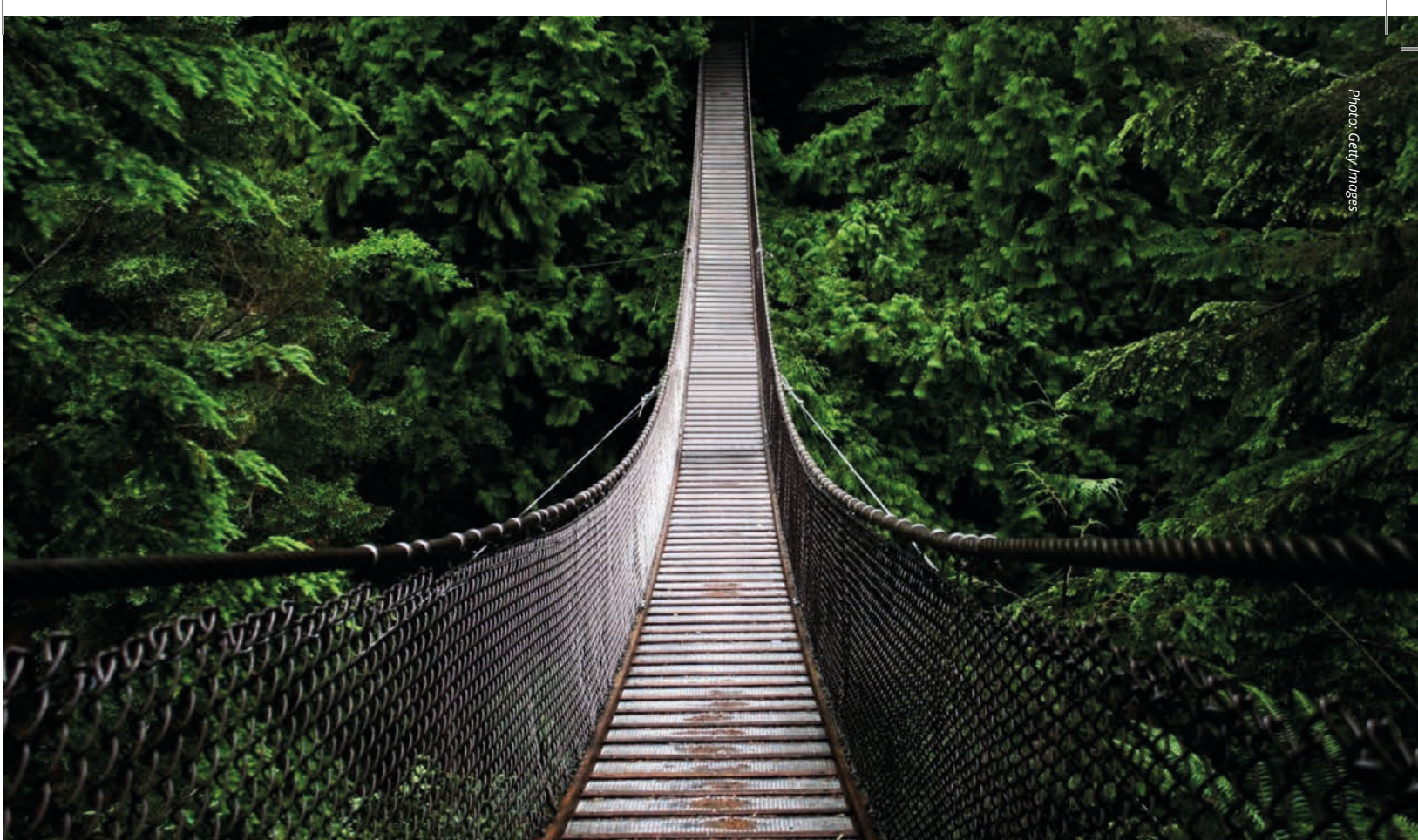


Photo: Getty Images

In the case concerning the rights of former employees of the Congolese Heineken company Bralima, the Dutch NCP negotiated an agreement that granted the former employees extensive compensation. In the case concerning working conditions at facilities related to the FIFA World Cup in Qatar in 2022, the Swiss NCP brought FIFA to the mediation table and an agreement was entered into. The agreement requires FIFA to, among other things, respect human rights and establish complaints mechanisms with possibilities for workers to apply for compensatory damages. An important development is taking place in the area of the environment. In 2019, the Dutch NCP concluded a specific instance against the major bank ING, where it was asserted that the bank was obliged to set specific climate targets for its portfolio in line with the goals of the Paris Agreement. ING agreed to this.

In 2013, Norway's NCP handled a specific instance against NBIM, which administers the Government Pension Fund Global, where it was determined that the OECD Guidelines, including the obligation to conduct due diligence, also apply to investments in companies in which the fund only has a small minority shareholding. We assume that this has contributed to more responsible administration of the fund, and the case also provided the momentum for the OECD's work on developing guidance documents for the financial sector. Norway's NCP has also handled complaints against Norwegian enterprises relating to the environment, indigenous rights and labour rights.

The NCP today is a well-established system with significant potential. Even if new legislation is adopted, the OECD Guidelines and the possibility of filing complaints with the NCP concerning a company's lack of compliance remain essential tools to achieve responsible business conduct. The NCP's work on a specific instance will be based on dialogue and mediation. The main purpose is to arrive at a solution that enables the company to manage the future risk of violations. If a violation has occurred, the NCP cannot order the company to pay compensation, but must suffice with making a statement that this should have been done. The matter of strengthening the NCP's possibility of imposing sanctions should be considered in new legislation relating to responsible business conduct.

There is much work to be done. A prerequisite for success is to further raise the profile of the Guidelines and the NCP system. We hope that our marking of the twentieth anniversary will contribute to this.



Frode Elgesem  
Chair



## What are the OECD Guidelines for Multinational Enterprises?

**The OECD Guidelines for Multinational Enterprises are the only multilaterally adopted, comprehensive guidelines for responsible business conduct backed by 49 governments.**

The Guidelines are recommendations from the OECD countries to promote responsible business conduct in all sectors. A main goal of the OECD Guidelines is that the business sector should contribute to sustainable development. The Guidelines express clear expectations of due diligence in the business sector in areas such as human rights, labour rights, the environment, anti-corruption and transparency. Seen as a whole, the Guidelines cover all the important areas that a responsible business needs to address. A core element of the OECD Guidelines is that companies are expected to perform due diligence to avoid causing harm to people, society and the environment.

The Guidelines are supported by a unique implementation mechanism of National Contact Points (NCPs). The NCPs were established by the adhering governments to raise awareness about the Guidelines and to establish a grievance mechanism, ensuring that concerned stakeholders have a place to turn to. The NCPs facilitate dialogue and mediation in order to resolve specific instances.



According to the OECD Guidelines, enterprises shall contribute to the following:

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Respecting  
human rights



Protecting the  
environment



Protecting  
labour rights



Preventing  
corruption

The Guidelines also contain chapters on disclosure, consumer interests, science and technology, competition and taxation.



# 49 National Contact Points

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## ● Countries with contact points:

Argentina	Czech Republic	Iceland	Luxembourg	Slovakia
Australia	Denmark	Ireland	Mexico	Slovenia
Austria	Egypt	Israel	Morocco	South Korea
Belgium	Estonia	Italy	The Netherlands	Spain
Brazil	Finland	Japan	New Zealand	Sweden
Canada	France	Jordan	Norway	Switzerland
Chile	Germany	Kazakhstan	Peru	Tunisia
Colombia	Greece	Croatia	Poland	Turkey
Costa Rica	Hungary	Latvia	Portugal	UK
		Lithuania	Romania	Ukraine
				USA

## ● Observer countries:

India  
China  
Russia

*The map is for guidance only and does not express any position on territorial status or sovereignty. A total of 49 countries have adopted the OECD Guidelines and are therefore obliged to establish a national contact point.*



The NCPs meet regularly at the OECD offices in Paris.



The NCP system was established in 2000 and is marking its twentieth anniversary in 2020.



The NCPs have received a total of 500 complaints related to business activities in more than 100 countries and territories.



Most of the cases have concerned human rights, general policies, and employment and industrial relations. In 2019, the first specific instance relating to the climate and the Paris Agreement was concluded *(read more on page 35)*

# Norway's National Contact Point – who we are and what we do

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The National Contact Point for Responsible Business Conduct Norway is an independent, public expert body comprising four members. Frode Elgesem was appointed new chair of the NCP on 1 March 2019, after Ola Mestad's period as chair expired. The members of the NCP are appointed by the Ministry of Foreign Affairs and the Ministry of Trade, Industry and Fisheries, in cooperation with the Ministry of Labour and Social Affairs and the Ministry of Finance. They are appointed on the basis of their professional expertise, and based on proposals from the social partners and civil society, represented by the Confederation of Norwegian Enterprise (NHO), the Confederation of Norwegian Trade Unions (LO) and the Forum for Development and Environment (ForUM). On 1 March, Beate Ekeløve-Slydal was elected as a new member based on a nomination by ForUM.

The NCP has a secretariat with two permanent full-time employees recruited by the Ministry of Foreign Affairs, and has had two temporary staff members in 2019. The secretariat is under the administrative authority of the Ministry of Foreign Affairs, but has a separate budget and operates independently of the Government.

The secretariat and the members engage in extensive promotional activities and provide guidance to Norwegian businesses and other stakeholders on how they can meet the requirements of the OECD Guidelines. The secretariat also prepares the handling of the specific instances.

All OECD countries are obliged to establish a National Contact Point. The way in which the NCPs are organised varies from country to country.

## Members

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**Frode Elgesem**

Chair,  
Judge at Borgarting Court of Appeal



**Cathrine Dehli**

Partner at Footstep



**Gro Granden**

Special adviser LO



**Beate Ekeløve-Slydal**

Political adviser at Amnesty  
International



**Ola Mestad**

Professor dr. juris,  
University of Oslo Chair  
until 1 March 2019

## The secretariat

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**Cathrine Halsaa**

Head of the secretariat



**Bente F. Bakken**

Senior adviser



**Åse Sand**

Senior adviser



# The NCP has three main tasks:

**1.**

**Promoting  
the OECD  
Guidelines**

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**2.**

**Handling specific  
instances**

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**3.**

**International  
cooperation with  
the OECD's central  
organisation and  
other NCPs**

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1

# Promoting and providing guidance about the OECD Guidelines

One of the NCP's most important tasks is to promote the OECD's Guidelines for Multinational Enterprises as an effective tool for preventing violations.

The Guidelines are more than just words. They are a practical tool that can prevent Norwegian companies from making the wrong decisions in meetings with people, society and the environment in other countries.

Norway's NCP carries out extensive information work and provides guidance to Norwegian businesses and other stakeholders on how they can meet the requirements of the OECD Guidelines, including through due diligence courses and sector-specific guidance.







'It's not about appearances. A structured approach to risk-based due diligence is crucial for profitability.'

*Roar Haugland, Executive Vice President of Scatec Solar*

'A prerequisite for profitability'

In all new projects, Scatec Solar has a dedicated budget line for due diligence. This is no different from having a budget line for the purchase of cables or hiring workers.

*TEXT: Marianne Alfsen, Felix Media.*

Scatec Solar builds and operates solar parks in emerging markets; countries where the economy is growing rapidly and the demand for clean energy is high. The downside is that the political and social framework in these countries can be challenging.

'It's not about appearances. A structured approach to risk-based due diligence is crucial for profitability,' says Roar Haugland, Executive Vice President for Sustainable Business & HSE in Scatec Solar. The Norwegian entrepreneurial venture has delivered 20 projects in nine countries across four continents.

Ten years ago, work on the first solar park began in South Africa. Everything seemed to be in place. The planned solar park affected neither the environment nor the water supply. Political and economic conditions were stable. They were all set to get started.

However, they had not taken into account the rampant social challenges and high unemployment rates in the local community from where they had recruited almost 1,000 workers. Lacking a systematic

approach to due diligence, the challenges came as a surprise and the handling was ad-hoc. That has now changed.

'This was our first, large solar project on a new continent and in a new culture. We were not properly prepared for the task. The learning curve was steep, but we landed on our feet. We had excellent local partners and learned a lot,' Haugland says.

### The good cynicism

Even to a company with a vision to improve the future, there is an element of cynicism to due diligence efforts.

'It all comes down to profitability and minimising risk,' according to Haugland.

What has changed since it all began in South Africa in 2010 is that the list of risks being considered is longer. Previously, political and economic conditions dominated. Now, the environment, human rights and a broad spectrum of social conditions are equally important. And there is a system in place to handle them all.

The company's projects are funded by, among others, Norfund and international investment banks. They all have strict due diligence demands, in line with the standards of the World Bank's investment branch, the IFC. Although Scatec Solar has built a robust system, it does not mean unforeseen challenges never occur.



'The difference is that we now have a follow-up method,' says Haugland. Such as in Honduras.

### **Violent demonstrations**

In 2018, Scatec Solar took over a project from a Spanish developer in Honduras – a country marred by violence and corruption. As construction was about to begin, the widespread unease among the local population became apparent, especially in areas Scatec Solar did not consider to be part of the solar park's immediate surroundings.

The initial peaceful protests soon turned confrontational and even violent. The protesters demanded answers. There were stories of how the solar plant could cause cancer and that the local temperature would increase by ten degrees Celsius. Others felt left out, because the social outreach programmes did not include their village.

'We were not up to speed and should have dug deeper before taking over the project,' admits Haugland.

### **No shame in turning back**

He emphasises that sometimes you need to pull the emergency brake, even if it will be costly.

'In Honduras, we could not continue unless we picked up the dialogue and mapped the situation once again,' says Haugland.

First, the company employed more community liaison officers on the ground and contacted local leaders. They set up neutral meeting places and invited people from the local communities to dialogue. For the perpetrators of violence, where the company had no choice but to initiate legal proceedings, they also found solutions. They offered reconciliation agreements and waived all charges against those who signed.

'We even offered some of them a job, and many still work at the plant. Nine cases remain, but we are in dialogue to resolve them,' says Haugland.

### **Never-ending work**

'Due diligence is not a one-time affair, and then you are done with it,' Haugland points out.

When the Honduras situation was at its worst, Scatec Solar did not know that the Norway's National Contact Point offers advice and facilitates mediation, even if there is no official complaint.

'It would have been useful to have someone to bounce ideas off,' says Haugland.

To those who believe small and medium sized businesses do not have the financial muscle to conduct due diligence to the same extent as larger businesses, Haugland has one message:

'Size is not an issue. We all benefit from reducing the risks.'

The Norwegian Government:

## Companies shall lead the field in the work on responsible business conduct



On 22 November 2019, the Government presented Report No 8 to the Storting (2019-2020) The state's direct ownership of companies – Sustainable value creation. The new White Paper on Ownership Policy states that the goal of the highest possible return over time requires companies to demonstrate sustainability and responsible business conduct. We asked the Minister of Trade and Industry what the expectations in the new white paper entail.

*The state has high ambitions for companies' work on responsible business conduct. The companies are expected to be at the forefront of this work. What does that entail?*

'The expectations set out in the white paper on state ownership policy are principles intended to support companies in creating long-term value in a responsible way. It is only natural that state-owned companies are subject to high expectations in terms of their work on responsible business conduct. There are several reasons for this, including that it helps to boost confidence in and the legitimacy of state-owned companies, and that it is a prerequisite for long-term value creation. We believe that the

companies leading the field are characterised by being able to identify and deal with material risk areas for those affected by their activities, including in the supply chain. The leading companies have the support of the board of directors in this work and integrate it in the company's goals, strategies and guidelines. The OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights form the basis for this work.

*'Companies are expected to perform due diligence. Why is this important and how can the companies use the OECD guidance for due diligence to this end?'*

'Due diligence is the method that both the OECD and the UN endorse for companies to identify, prevent and communicate adverse impact and risks that the company's activities may represent for people, society and the environment. These are the same circumstances that the state as owner is concerned with and that Norway has undertaken to promote. The OECD has also done a thorough job of preparing a guidance document on how companies can conduct due diligence. The method takes a risk-based approach that means it can be used by all companies regardless of their size and the risks they represent. This is important to the state as owner since it has many different kinds of companies in its portfolio.'



*'Well-functioning and responsible businesses are an essential part of achieving the Sustainable Development Goals. The Government expects Norwegian companies to be familiar with and comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. It is important that the companies perform due diligence and can demonstrate how they work to avoid causing harm to people, society and the environment. I encourage Norwegian businesses to use Norway's NCP in this work.'*

*Ine Eriksen Søreide, Minister of Foreign Affairs*



Photo: Asger Sponge Brekke, FD/UD

### Three important messages concerning responsible business conduct in the White Paper on Ownership Policy:

- Norwegian state-owned companies shall lead the field in their work on responsible business conduct.
- The goal of the highest possible return over time requires the companies to demonstrate sustainability and responsible business conduct.
- The OECD Guidelines for Multinational Enterprises are the most extensive set of guidelines for multinational enterprises available. They also incorporate the UN Guiding Principles on Business and Human Rights and ILO's core conventions – as well as the principle that companies must perform due diligence.



*Report No 8 to the Storting (2019–2020)  
The state's direct ownership of companies  
– Sustainable value creation.*

# Indigenous rights in focus

**Challenges related to the rights of the Sami people in connection with wind power and mining developments were the topics discussed at a seminar in Karasjok organised by the Norwegian National Human Rights Institution (NIM) and Norway's NCP.**

Industrial development in indigenous communities raises a number of human rights issues. As an indigenous people, the Sami can be particularly hard-hit by wind power and mining development because the activities can have a detrimental effect on the natural basis for the Sami people's traditional sources of livelihood, such as reindeer herding and fishing.

At the seminar, representatives from businesses and the Sami community discussed their experiences of



conflicts and dialogue concerning business development projects. The NCP and NIM explained what kinds of requirements and international standards businesses are expected to comply with in order to demonstrate responsible business conduct and respect indigenous rights. This was the first time a national human rights institution and an OECD NCP had co-hosted an event in an indigenous community.

Two specific cases were discussed at the seminar: the ongoing case concerning the Nussir mine in Kvalsund municipality and the case that has been handled by the NCP concerning Statkraft and SSVAB's wind power development in Jinjjevaerie Sami village in Northern Sweden.



*Anders Eira, Protect Sápmi; Sidsela Nyebak, Statkraft; Mariann Gråik, Jinjjevaerie Sami village.*



At the seminar, the NCP launched the Norwegian and Sami language versions of the OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector

*'The seminar demonstrated NIM and the NCP's important roles in promoting dialogue between businesses, public authorities and the Sami people about human rights issues, as well as providing advice and guidance on how to resolve conflicts when they arise.'*

*Adele Matheson Mestad, Director, Norwegian National Human Rights Institution, NIM*



Representatives from the Sami Parliament, Sami civil society, Jinjjevaerie Sami village, Fiettar reindeer herding district, Protect Sapmi, Kvalsund municipality, and the business sector represented by Statkraft, SSVAB and Nussir participated in the seminar.



# Educating businesses for a responsible future

**What is responsible business conduct and what does it entail in practice? This is what businesses taking the NCP's popular course on responsible business conduct and due diligence will learn more about.**

The course runs over three days and is suited to all types of enterprises with international activities, regardless of their size and the sector they operate in.

The purpose of the course is to help the participants to get started or prepare the work on mapping and handling risks internally in the business and externally in the supply chain and with business relationships.

The course consists of both theory and practice. The participants learn about the governing international standards for responsible business conduct, such as the OECD Guidelines for Multinational Enterprises, the necessity of stakeholder engagement and the due diligence method. The participants work actively with this method using the NCP's tool, the RBC Compass, with help from the external advisers. The attending businesses share their experiences and explain how they work on responsible business conduct in practice.

Norway's NCP ran two courses in 2019. So far, 61 businesses and more than 100 people have participated in the five courses the NCP has held to date.



*The NCP's courses teach businesses how to establish whether their activities could be associated with harm to people, society or the environment.*



'The course was very helpful and well organised by the NCP. The course organiser and the guest lecturers gave us a good understanding of the OECD Guidelines and which duties we are subject to, including in relation to our suppliers. We also received a thorough introduction to the guidance document, which provides good advice on how to conduct due diligence.'

*Knud Nørve,  
member of the board, Juralco AS*



'For a relatively new company like Aker Energy, the course was useful because we learned about how other companies work on strategic risk management. The network we gained through the course came in handy when we were to conduct our first materiality analysis for the company's sustainability strategy: We asked participants from the financial sector to provide input on how they assessed the company's ESG profile.'

*Brita Bergland,  
CSR Advisor, Aker Energy AS*



'The NCP's course was both educational and interesting, with varied and helpful presentations. We have learned a lot about the Guidelines, gained a new network and received useful tips on how we can continue our work on sustainability in the company.'

*Kristina Hesjedal Schnell,  
Risk Manager Norway, TechnipFMC*

# Topical seminar for state-owned companies

The Ownership Department at the Ministry of Trade, Industry and Fisheries, Norway's NCP and Ethical Trade Norway collaborated on a topical seminar held in 2019 concerning responsible business conduct and due diligence for state-owned companies. The Ownership Department described how the OECD's method has now become a recommended standard for businesses as regards responsible conduct and due diligence. The participants represented 30–40 key state-owned companies. Chair of the NCP Frode Elgesem provided an introduction to responsible business conduct and the OECD's Due Diligence

Guidance. Specific examples from a company were presented and the various state-owned companies shared their experience with one another. Representatives from civil society took part in a panel debate about how civil society can contribute to companies' work on due diligence and stakeholder engagement with, for example, affected local community groups.

Flytoget was one of the companies that participated and that contacted the NCP after the course for more specific guidance on due diligence.



*Frode Elgesem talks about the importance of using the OECD Guidelines and performing due diligence.*





The seminar held at the Ministry of Trade, Industry and Fisheries sparked an interest and motivation to learn more about the OECD's definition of due diligence. With the help of the NCP's introduction document to the OECD guidance, the company's threshold for conducting due diligence has been lowered. The guidance is of such high quality, both in an educational and professional sense, that the job became much easier. For Flytoget, the process led to us preparing guidelines for responsible business conduct, which are endorsed by the management and board. The guidelines will become part of Flytoget's business governance.'

Åge Pedersen,  
Head of Administration, Flytoget



The NCP's introduction to the OECD Due Diligence Guidance for Responsible Business Conduct was presented at the topical seminar for state-owned companies.

# The NCP dialogue meeting: everyone needs to work as a team

**The NCP organises an annual dialogue meeting in connection with the launch of the annual report. The Confederation of Norwegian Enterprise (NHO), ForUM, IndustriALL and Cermaq provided valuable insight into the NCP's work.**

The NHO, ForUM and Cermaq all underlined the importance of the NCP's guidance for business and industry, and emphasised in particular the Norwegian introductory document to the OECD Due Diligence Guidance and the NCP's RBC Compass as useful tools. Katarina Sætersdal (NHO) expressed a wish for closer cooperation with the NCP and underlined the importance of the NCP's presence at pre-departure meetings for trade mission delegations. She also asked what guidance the foreign service missions could potentially contribute in relation to responsible business conduct. Atle Høie (IndustriAll) emphasised the need for holding the big international companies accountable. 'Pay and working conditions get worse the further you go down the supply chain. Many international companies fail to acknowledge their responsibility for this,' said Høie. He underlines that

respecting labour rights and ensuring workers are heard through collective bargaining are decisive elements of improving working conditions in the supply chain. Ingrid Rostad (ForUM) was clear that the NCP's grievance mechanism provides a unique opportunity to have a case reviewed, and that it is important as a deterrent factor.

Elgesem thanked the participants for their input on the NCP's work, which particularly concerned the grievance mechanism, labour rights and the supply chain, and on the NCP's courses and training. He also said that, when it comes to the right to file a complaint, it is important that it is not perceived as a provocation, and that the parties to a complaint have faith in the NCP's ability to assist them in bringing about a resolution to the situation through mediation. To achieve compliance with the Guidelines, it is nonetheless essential that the right to complain exists and is actively used. The main characteristics of the grievance mechanism are dialogue and mediation, and while a specific instance is being handled, a long-term goal is to provide assistance that can improve the responsible business conduct of a company.



*Frode Elgesem thanked the participants for their interest in and input on the NCP's work.*



'The goal must be the best possible business sector, not necessarily the highest number of complaints,' said Katarina Sætersdal of NHO.



'It is important that civil society has a place at the negotiation table together with the businesses, and not only in demonstrations outside,' said Ingrid Rostad from ForUM.



'It's impossible to solve problems without talking to the people at the grassroots level doing the dirty work. The workers must be involved,' said Atle Høie of IndustriAll.





State secretary Marianne Hagen at NHOs meeting at Sola.

## The Government encourages Norwegian businesses to use the due diligence guidance document

State Secretary Marianne Hagen launched the NCP's practical introduction to the OECD Due Diligence Guidance for Responsible Business Conduct to members of the Confederation of Norwegian Enterprise (NHO).

Hagen encouraged all businesses and affected stakeholders to actively use the guidance document. Minister of Foreign Affairs Ine Eriksen Søreide and Minister of Trade and Industry Torbjørn Røe Isaksen have written the preface to the Norwegian brief guide. They underline that Norwegian authorities expect Norwegian companies to be familiar with and comply with the OECD Guidelines for Multinational Enterprises and to perform due diligence.



Heidi Furustøl, director of Ethical Trade Norway.

## Launch of the NCP's introduction to the OECD Due Diligence Guidance

In cooperation with Norway's NCP, Ethical Trade Norway invited participants to a breakfast meeting where Frode Elgesem provided a practical introduction to how the business sector can perform due diligence to prevent causing harm to people, society and the environment.

'Many Norwegian businesses want to demonstrate responsible business conduct, but can find it challenging in practice. The NCP has developed a brief, practical Norwegian-language introduction to the OECD Due Diligence Guidance in cooperation with key Norwegian stakeholders in order to increase its relevance to all types of businesses,' says Elgesem.



Jeanett Bergan (KLP), Monica Mee (NORSIF), Heidi Furustøl (Ethical Trade Norway) and Cathrine Halsaa (NCP secretariat).

## Investors increasingly focus on responsible investments

At a seminar for the financial sector organised by the Norwegian Forum for Responsible and Sustainable Investment (NORSIF), the NCP gave the introductory talk on the OECD's expectations for responsible business conduct in the financial industry.

'The OECD develops useful tools that it is important for the financial industry to be aware of, since they provide a common understanding of and language for discussing responsible business conduct,' says Monica Mee from NORSIF. The financial institution KLP presented its work on risk assessment and the application of environmental, social and governance (ESG) criteria, and how KLP uses the OECD's methods for due diligence in its work.



Member of the secretariat Bente Follestad Bakken talks about the due diligence method at HR Norge's members' meeting in Ålesund in September.

## CSR as part of the personnel function

Norway's NCP gave the introductory talk about the OECD Guidelines and due diligence at the organisation HR Norge's members' meeting in Ålesund. The Kongsberg group, Sparebanken Møre and Ålesund municipality talked about how they define their role, and how they set goals and work on CSR. The NCP showed how the OECD Guidelines are relevant to the HR function by demonstrating how responsible business conduct and respect for human rights can be integrated in the different business areas of a company. A number of research reports, including Academic Work's labour market report, show that young graduates place more importance on CSR than have previous generations. Sustainability, a good working environment and career opportunities are at the top of the wish list. This means that, in order to attract qualified top candidates, companies should clearly demonstrate how they work on responsible business conduct.



*The secretariat (from the left): Rina Narayanan Narasimhan, Cathrine Halsaa, Bente Follestad Bakken and Åse Sand.*

## Seminar and event to promote the OECD Guidelines

Norway's NCP and the secretariat engage in extensive information activities throughout the year to promote responsible business conduct and the NCP system at seminars, conferences, meetings and stands. In 2019, the NCP organised nine events either alone or together with other organisations. The focus has been on responsible business conduct and due diligence, indigenous rights and knowledge sharing between Norway's NCP and the other Nordic NCPs.

The NCP has given the introductory talk at sixteen events organised by others. Focus on responsible business conduct, due diligence and the UN Guiding Principles for Business and Human Rights have been recurring topics. On average, between fifteen and twenty participants from civil society, business and industry, academia and the public authorities have attended these events.

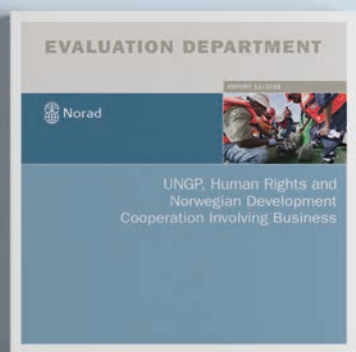


## 'SheDil' – new tool for employing a gender focus in the due diligence process

FOKUS – the Forum for Women and Development has developed a digital tool for bringing the gender perspective into due diligence. The tool has been named 'SheDil'. The gender perspective is integrated in the OECD Due Diligence Guidance for Responsible Business Conduct and in most of the OECD's sectoral guidance documents. The guidance documents exemplify how the gender dimension can be integrated in due diligence.

The secretariat took part in a demonstration and pilot launch of the tool along with a number of other participants invited to the launch, including the company Hydro. The NCP welcomes the new tool and has provided feedback on the pilot to enable even better adaptation of the tool to the OECD's due diligence methods.





*The NCP has provided expert assistance to the Ministry of Foreign Affairs for follow-up of the UNGPs in development cooperation involving business and industry.*

## Better guidance for businesses from Norwegian foreign service missions

Businesses have called for helpful advice on responsible business conduct and risk assessments from Norwegian foreign service missions. In 2018, the Norwegian Agency for Development Cooperation (Norad) conducted the evaluation 'UNGP, Human Rights and Norwegian Development Cooperation Involving Business'. The evaluation recommended improving systems, capacity building and resources, and to specify expectations of and responsibility for implementing the UNGPs in development cooperation involving the business sector. In 2019, the Ministry of Foreign Affairs prepared a follow-up plan for the recommendations in this evaluation. The follow-up entails increasing the foreign service missions' expertise in responsible business conduct and guidance of Norwegian companies in countries with which Norway collaborates, for example through the use of an e-learning course.



Photo: Isabelle Hugøy

*From the left: Ruth Astrid Sæter (chair of the meeting), Prof. Ståle Knudsen (University of Bergen), Janis Kanavin (former Ministry of Foreign Affairs), Martin Norman (Greenpeace), Frode Elgesem and Morten Mikkelsen (Equinor).*

## Spotlight on Norwegian energy companies and CSR abroad

The Energetics research group at the University of Bergen has looked at how Norwegian businesses handle CSR abroad and their dilemmas related to sustainability and value creation. This formed the basis for two panel debates in Bergen and Oslo organised by the research group. Three cases involving the energy companies Statkraft, Equinor and DNO were presented.

Norway's NCP referred to the new white paper on state ownership policy, which clearly states that Norwegian companies must lead the field in responsible business conduct and that this is a precondition for profitable operations in the long term.

A nighttime photograph of a cityscape. On the left, a bridge with a lit-up arch and an American flag is visible. On the right, a tall skyscraper with many lit windows stands prominently. The sky is dark blue, and the water in the foreground reflects the lights.

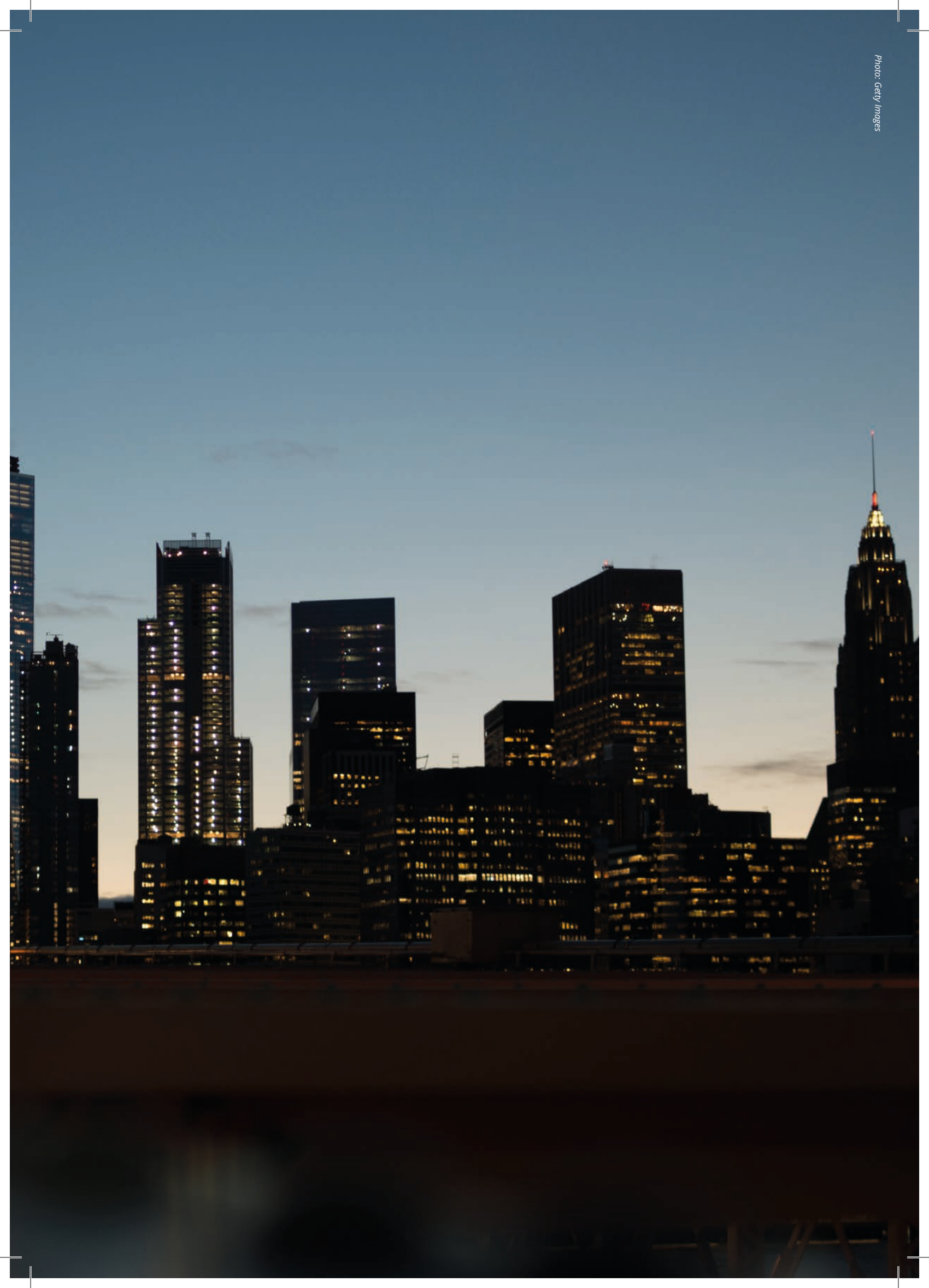
## 2

# Handling of specific instances

The OECD National Contact Point system provides individuals, local communities and organisations with a mechanism for complaints when they believe that multinational enterprises have had a negative impact on people, society or the environment. This makes the OECD Guidelines for Multinational Enterprises unique. No other international instruments have a corresponding grievance mechanism.

Norway's NCP handles complaints against Norwegian multinational enterprises concerning allegations of non-compliance with the OECD Guidelines.

The complaints mechanism is non-judicial. The NCP offers guidance, dialogue and mediation between the parties, and the goal of the process is to arrive at a joint solution. The handling of specific instances must be impartial, predictable, fair and in line with the Guidelines.





'The day we believe we have it all under control is the day the risk goes haywire. We need to be on our toes at all times.'

*Beate Ekeløve-Slydal, Political Adviser in Amnesty International Norway and NCP member*

## The National Contact Point – an invisible resource?

Since 2009, the National Contact Point for Responsible Business Conduct (NCP) in Norway has only handled 12 complaints. The reason is that civil society does not use the complaints mechanism to the extent that they could. This is something the newest NCP member wants to change.

*TEXT: Marianne Alfssen, Felix Media.*

'We need to be forward-leaning! We need to think outside the box and go beyond our comfort zone.'

For two decades, Beate Ekeløve-Slydal has been an advocate for responsible business conduct as Political Adviser for Amnesty International Norway. In 2019, she became a member of Norway's National Contact Point (NCP). Her experience from a vocal lobby organisation will come in handy as she embarks on a mission to make the NCP, the Guidelines and the complaints mechanism more visible.

'Anyone who works with communications knows that if you can't get your message through, it doesn't matter that you are the best at what you do,' says Ekeløve-Slydal.

### A resource to be reckoned with

It is not a goal in itself to receive more complaints. However, it is important to make more people aware of the complaints mechanism – and make use of it when necessary.

'The complaints mechanism represents a unique possibility for civil society to put the spotlight on companies they believe are violating human rights,' says Ekeløve-Slydal, pointing out that the opportunity to sit around a table and talk to your opponent is in itself valuable.

Ekeløve-Slydal believes companies, authorities and civil society need more information about the great resource the NCPs actually represent.

'We have expertise on what responsible business conduct really entails, and more importantly, how to do it,' she says, pointing out the Norwegian introduction to the OECD Due Diligence Guidance for Responsible Business Conduct as a solid and tangible tool.

### The role of the embassies

Beate Ekeløve-Slydal believes the Norwegian embassies and consulates could take a more proactive role.

'One of the main roles of the Norwegian embassies and consulates is to support Norwegian businesses abroad. They should promote the OECD Guidelines more actively. They should also actively



inform local civil society that they can make use of the complaints mechanism, if they believe Norwegian businesses impact society, people or the environment negatively,' says Ekeløve-Slydal.

### Consequences for businesses

Ekeløve-Slydal believes that businesses and the public authorities need to be reminded of the relevance of the NCPs.

'People need to know that there is a grievance mechanism to turn to when they suspect negative impacts from business conduct. Today, the strongest reaction we can give is to make a final statement,' she continues.

### Other reactions

Although the NCPs do not have the possibility to impose sanctions, other parties may choose to let violations of the OECD Guidelines have consequences.

'For instance, companies that have been found to violate the Guidelines should not be part of the Government's trade delegations abroad, nor receive public grants. It should also be a requirement that companies benefitting from these privileges conduct due diligence,' Ekeløve-Slydal suggests.

This is in line with the recommendations of the UN Working Group on Business and Human Rights.

### Stronger legal means?

The OECD Guidelines, UN Global Compact, UN Guiding Principles on Business and Human Rights – all current measures are voluntary. However, there is an ongoing process in several European countries to make businesses legally responsible for respecting human rights and safeguarding the environment – Norway included.

'The Norwegian Action Plan, following up the UN Guiding Principles from 2015, only states what businesses are recommended or encouraged to do. The NCP believes it is time for a new action plan,' Ekeløve-Slydal says.

She welcomes the new Due Diligence Law for Norwegian businesses, proposed by a Government-appointed ethics committee.

'All of this does not make the NCPs less important. Quite the contrary,' Ekeløve-Slydal says.

'The day we believe we have it all under control is the day the risk goes haywire. We need to be on our toes at all times.'

## Specific instances in the NCP

In 2019, Norway's NCP received two new complaints that are currently being handled. An initial assessment has not yet been made by the NCP in the cases.

### Specific instance: Industri Energi – DNO II

The NCP concluded its handling of specific instance II from the trade union Industri Energi against DNO ASA with a final statement since DNO declined from taking part in mediation. The case concerned a complaint received from Industri Energi claiming that DNO had not complied with Yemeni law concerning pay and working conditions for former employees in Yemen. It was further stated that the company had applied less favourable standards for working conditions than similar companies. Industri Energi claimed that this was a violation of the recommendations set out in the OECD Guidelines. The NCP has not found that DNO ASA has acted in violation of the OECD Guidelines.



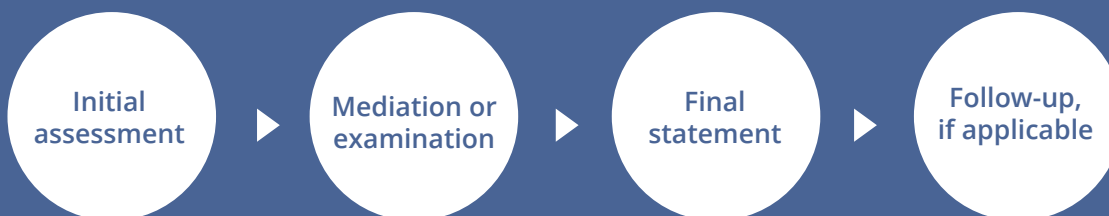
Photo: DNO Yemen Union

The NCP recommended that DNO in the future should

- participate in the NCP's process with the highest possible degree of transparency in order to demonstrate its full respect for the NCP's grievance mechanism, which is a key element in the OECD Guidelines.
- strive to identify and map which standards for working conditions are applied by similar employers in the countries in which the company operates, and apply such standards in line with the Guidelines Chapter V paragraph 4 a).
- continue to strive to find good solutions for each former Yemeni employee who contacts them in good faith to receive what they are entitled to under Yemeni law.

Frode Elgesem did not participate in the handling of this specific instance. Former Chair of the NCP and Professor of Law Ola Mestad led the handling of the case.

### The four stages of the NCP's handling of a specific instance





## Three international specific instances from 2019 that are worth noting

The NCPs collaborate and share information about their handling of specific instances.

It is becoming increasingly common that a specific instance concerns the NCP of more than one country. Norway's NCP keeps up to speed on the specific instances handled by NCPs in other countries to see how they deal with the various topics covered by the OECD Guidelines. This helps to establish equal requirements and

recommendations for how companies should operate, demonstrate responsible business conduct and comply with the Guidelines. Below are three examples of specific instances from 2019 that have raised issues related to how companies should address indigenous rights and climate change, and a case that has shown that the Guidelines can also concern global confederations and organisations.

### Switzerland

In 2019, the Swiss NCP concluded a specific instance submitted by the Society for Threatened Peoples against Credit Suisse concerning failure to respect indigenous rights in a controversial oil pipeline project in North Dakota in the USA. As a result of the mediation process, Credit Suisse will integrate the principle of free, prior and informed consent (FPIC) for indigenous peoples in its internal guidelines for extraction projects. This means that Credit Suisse's customers and business associates must document that they act in compliance with the FPIC principle.

### The Netherlands

Climate change and the Paris Agreement have for the first time been the topic of a specific instance being handled by an NCP, in this case in the Netherlands. The complaint was filed by Oxfam Novib, Greenpeace Netherlands, BankTrack and Friends of the Earth Netherlands against the global financial institution ING. In its final statement, the Netherlands' NCP stated that ING and other commercial banks must strive to define specific climate goals for their financial services in line with international climate commitments such as the Paris Agreement.

### The UK

In 2019, the UK's NCP decided to accept a specific instance concerning Bonsucro, a member organisation that certifies sustainable sugar cane production. The organisations Inclusive Development International, Equitable Cambodia and the Cambodian League for the Promotion and Defense of Human Rights claim that a key member of Bonsucro has contributed to the forced relocation of 700 families in Cambodia and that Bonsucro has not performed adequate due diligence when considering membership. The case is still in process.



### 3

## International cooperation with the OECD's central organisation and other NCPs

The third aspect of the NCP's work is to cooperate and share best practice with the OECD and the 49 other National Contact Points. For the contact point system to gain trust, it is essential that multinational enterprises are subject to the same requirements and expectations regardless of which OECD country they are based in. The NCPs are organised differently, however, and their resources and status also vary, which challenges this principle.







'Over the next decade, I want to see all the NCPs provide an easily accessible, effective complaints mechanism, which serves as a forum for finding solutions through dialogue. This is not an issue of capacity, but political will.'

*Christine Kaufmann, Chair OECDs Working Party for Responsible Business Conduct*

## Staying relevant and practical

The OECD Guidelines for Multinational Enterprises have proven to be a flexible and practical instrument, able to keep up with a changing world and new demands.

*Text: Marianne Alfsen, Felix Media.*

'The issues that challenge our lives and societies today are all in the Guidelines: climate and the environment, labour rights, corruption, human rights, taxes. That is the huge advantage of the OECD Guidelines; they touch on all aspects of responsible business conduct,' says Christine Kaufmann.

In 2019, she was elected the Chair of the Working Party for Responsible Business Conduct in the OECD. The Working Party is in charge of ensuring the continued relevance of the Guidelines and the National Contact Points for Responsible Business Conduct – a unique complaints mechanism under the Guidelines, found in 49 countries.

The Guidelines were first created by OECD governments in 1976, at a time when international consensus on these matters was hard to come by.

Over the years, the scope has broadened to address all areas where business interacts with society, in response to a world where boundaries are being erased and the playing field for an increasing number of businesses is global. The Guidelines were last revised in 2011, when a human rights chapter was added to align with the UN Guiding Principles on Business and Human Rights (UNGPs).

### Ahead of their time

The Litmus Test of the Guidelines' ability to develop in step with society at large came when the Sustainable Development Goals (SDGs) were adopted in 2016. The Guidelines passed with flying colours and proved that they were ahead of their time.

'The Guidelines talk about businesses being responsible in a broader sense. That they not only should do no harm, but actually contribute to society,' says Kaufmann.

And that fit hand in glove with the SDGs:

'We found a match with every single SDG in our Guidelines,' continues Kaufmann, adding that: 'Responsible business conduct is the best way to contribute to the SDGs.'



Photo: Jarl Ormestad/DSS

### A practical tool

'The Guidelines enshrine a vision shared by all stakeholders for business to contribute to society – and they don't stop there: They break it down into bits and pieces that make that vision come alive and give affected people a voice through the NCP mechanism. This is what makes the OECD Guidelines unique,' according to Kaufmann.

She explains that the operationalisation of the OECD guidelines, with a general Due Diligence Guidance document launched in 2018, is the result of continuous collaboration between the business community, trade unions, civil society and governments. They were formed in agreement through a multi-stakeholder process, which is a major key to their success.

In addition, Kaufmann says, the Due Diligence Guidance is written in plain language that is understood at middle-management level, since that is where action is taken.

'The Working Party on RBC really makes an effort to live up to the OECD promise of *Better Policies for Better Lives*. And we have the instruments to do so – the National Contact Points for Responsible Business Conduct.'

### A question of will

The National Contact Points for Responsible Business Conduct (NCPs) are found in each of the 49 countries that adhere to the Guidelines. They work to promote the Guidelines and handle complaints. In 2020, the NCPs have been around in their current form for 20 years.

'The complaints mechanism is much better known now than two decades ago. But we still have a long way to go,' Kaufmann says.

She admits that there are huge differences between the NCPs when it comes to quality, status and practice in handling complaints. These differences need to be addressed.

'I am an optimist by design,' Kaufmann says. 'Over the next decade, I want to see all NCPs provide an easily accessible, effective complaints mechanism, which serves as a forum for finding solutions through dialogue. This is not an issue of capacity, but political will.'



Photo: Per Kristian Lie Løwe/Konosis

The NCPs of Latvia, Lithuania, Norway, Sweden, Denmark, Finland and Iceland and the OECD secretariat met up in Oslo for a network seminar.

## Nordic-Baltic NCPs intensify responsible business conduct efforts

**Sharing experience and examples of best practice are important to strengthening the NCP system. The Nordic and Baltic NCPs meet on a regular basis in a network established for this purpose.**

The group has been recognised as a trust-based forum for raising specific issues, such as the best way of giving advice to businesses about due diligence, and concrete methods for successfully dealing with specific instances.

External experts shared their experience of work on responsible conduct in the financial and textile sectors. DNB, NORSIF and the Danish MP Pension gave

examples of how the OECD guidance for the financial industry can be incorporated in the form of step-wise measures to identify and handle the risk of negative impacts. The Pierre Robert Group described the measures it uses to assess and deal with risk in textile production. The Confederation of Norwegian Trade Unions (LO) gave an introduction on challenges related to labour rights in the Nordic and Baltic countries, while the Forum for Development and Environment (ForUM) talked about how civil society can provide guidance to businesses. Chair of Norway's NCP Frode Elgesem told state secretary Marianne Hagen that the public authorities' strong support of the NCP's work is particularly valuable in the work on responsible business conduct.





*The NCPs in the Nordic and Baltic countries have an important job of promoting responsible business conduct and ensuring equal treatment in relation to guidance and the handling of specific instances,' said state secretary Marianne Hagen when she opened the second network seminar for the Nordic-Baltic NCPs in Oslo on 20–21 May.*



*Photo: Per Kristian Lie LøweKonsis*

*Group work on expedient procedures for handling specific instances: Barbara Bijelic representing the OECD, Cecilie Meciah Haugen Ngwenya and Linda Nielsen representing Denmark's NCP, Henning Kloster-Jensen representing the Norwegian Ministry of Foreign Affairs, Cathrine Halsaa representing Norway's NCP and Jakob Kiefer representing the Swedish Ministry for Foreign Affairs.*



Norway's NCP in cooperation with the Dutch Agreement on Sustainable Garments and Textile, and the Norwegian Fashion Hub organised a separate workshop under the OECD Forum on Due Diligence in the Garment and Footwear Sector. Cathrine Dehli, NCP member; Elin Kathrine Saunes, Manager of Norwegian Fashion Hub; Fleur Meerman, Senior Policy Advisor with SER; and Bente Follestad Bakken representing the NCP's secretariat.

## OECD forum in Paris for a responsible garment and footwear industry

### How can small and medium-sized enterprises work on prioritising risk in the supply chain?

This was the topic of a side event that the NCP co-hosted at the annual OECD Forum on Due Diligence in the Garment and Footwear Sector, in cooperation with the Norwegian Fashion Hub and the Dutch Agreement on Sustainable Garments and Textile. The event was a workshop where participants discussed how small and medium-sized businesses can perform better due diligence on the basis of a specific case concerning a small Dutch textile company. Representatives of the company explained how they had started working on risk assessment and that the work had revealed several types of serious risk in the supply chain. The workshop participants discussed how the company

should prioritise dealing with these risks seen in light of the degree of severity and scope of the risk.

Responsible procurement practice, chemical management, investments in emerging markets and dilemmas relating to the gender perspective were just some of the numerous topics discussed.

The main message of the Forum on Due Diligence in the Garment and Footwear Sector was clear: Effective and ambitious international collaboration, with a focus on due diligence, will contribute to raising the living standard and create opportunities for individuals in the global supply chain.

More than 40 countries were represented at the forum, which brought together more than 400 experienced participants from business and industry, civil society, trade unions and public authorities.





## UN forum: encouraging states to demonstrate leadership to ensure that businesses respect human rights

The main topic of the UN Forum on Business and Human Rights in 2019 was the need for national authorities to intensify efforts on responsible business conduct and ensure that businesses respect human rights and implement the UNGPs. Telenor, Hydro and Equinor took part in panel debates at the forum, which brings together several thousands of participants each year in Geneva.

Frode Elgesem, Chair of Norway's NCP, gave the opening talk on the OECD's work on responsible business conduct at a breakfast meeting for the large Norwegian delegation. State secretary Marianne Hagen took part in a panel debate on how to protect and prevent attacks on human rights defenders in cases relating to business activities.



## The OECD Global Forum on Responsible Business Conduct in Asia for the first time

The annual OECD Global Forum on Responsible Business Conduct brings together stakeholders from business and industry, trade unions, civil society and academia to discuss global challenges relating to responsible business conduct. In 2019, the forum was held in Bangkok, with more than 700 participants from 42 countries. This was one of the biggest events on responsible business conduct organised in Asia that year. Among the topics raised were migrant workers, a gender perspective in the global supply chain, decent work, and trade and investment agreements.









## The Sustainable Development Goals

The 17 Sustainable Development Goals are ambitious, aiming, among other things, to eradicate all forms of poverty and combating climate change. The goals cannot be achieved without contributions from the business sector and the infusion of private capital. Responsible business conduct is both an important step towards achieving individual goals and fundamental to the goals as a whole. The OECD Guidelines express basic requirements of responsible business conduct that are a precondition for achieving the UN Sustainable Development Goals.

# Accounts for 2019 for the NCP

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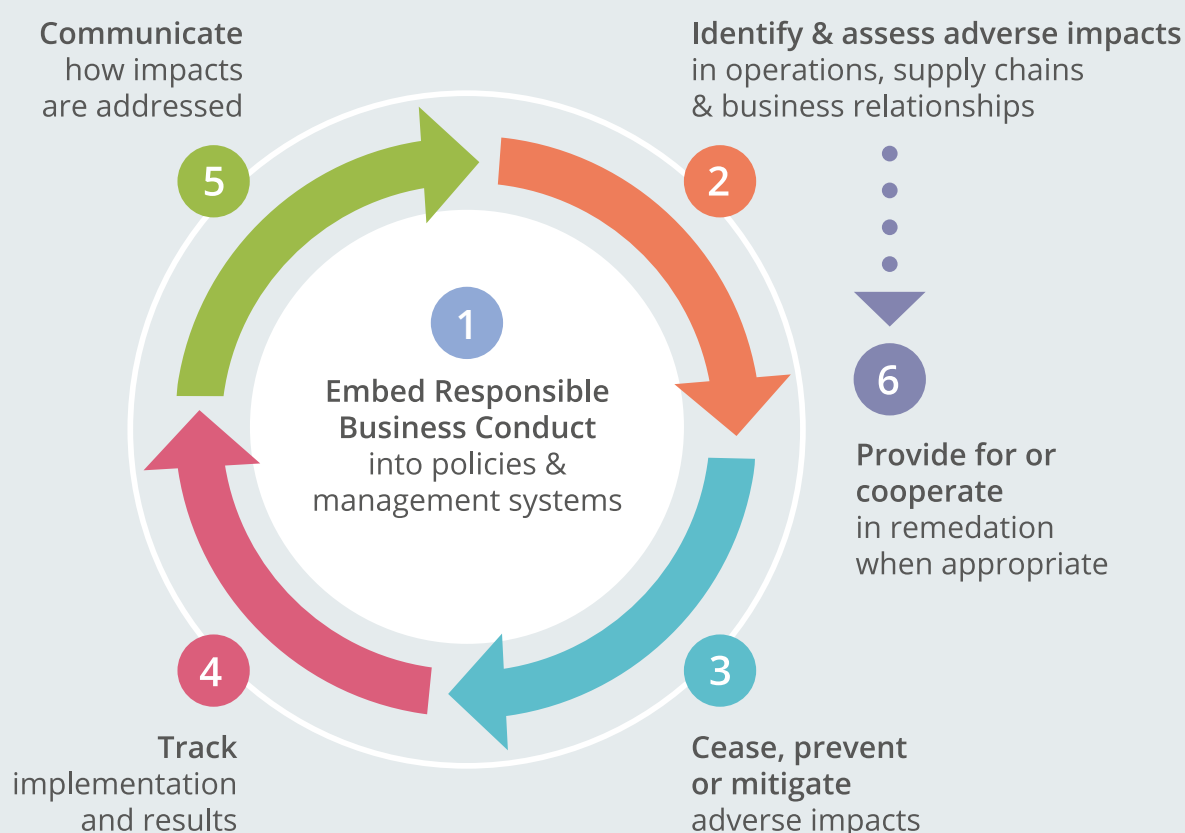
The NCP's budget has mainly gone to fees for the NCP members and secretariat employees (two permanent employees and 1.5 temporary positions). Other funds are spent on the handling of specific instances, preparing information and course material, and providing expert assistance.

All figures in NOK

	2019 EXPENDITURE
Fees for NCP members	407 500
Pay, secretariat	3 140 000
Travel	179 000
External consultancy	536 000
IT, misc. office equipment and printed matter	67 000
Information activities, courses and meetings	516 000
Translations	155 000
<b>Total</b>	<b>5 000 500</b>



# The due diligence model

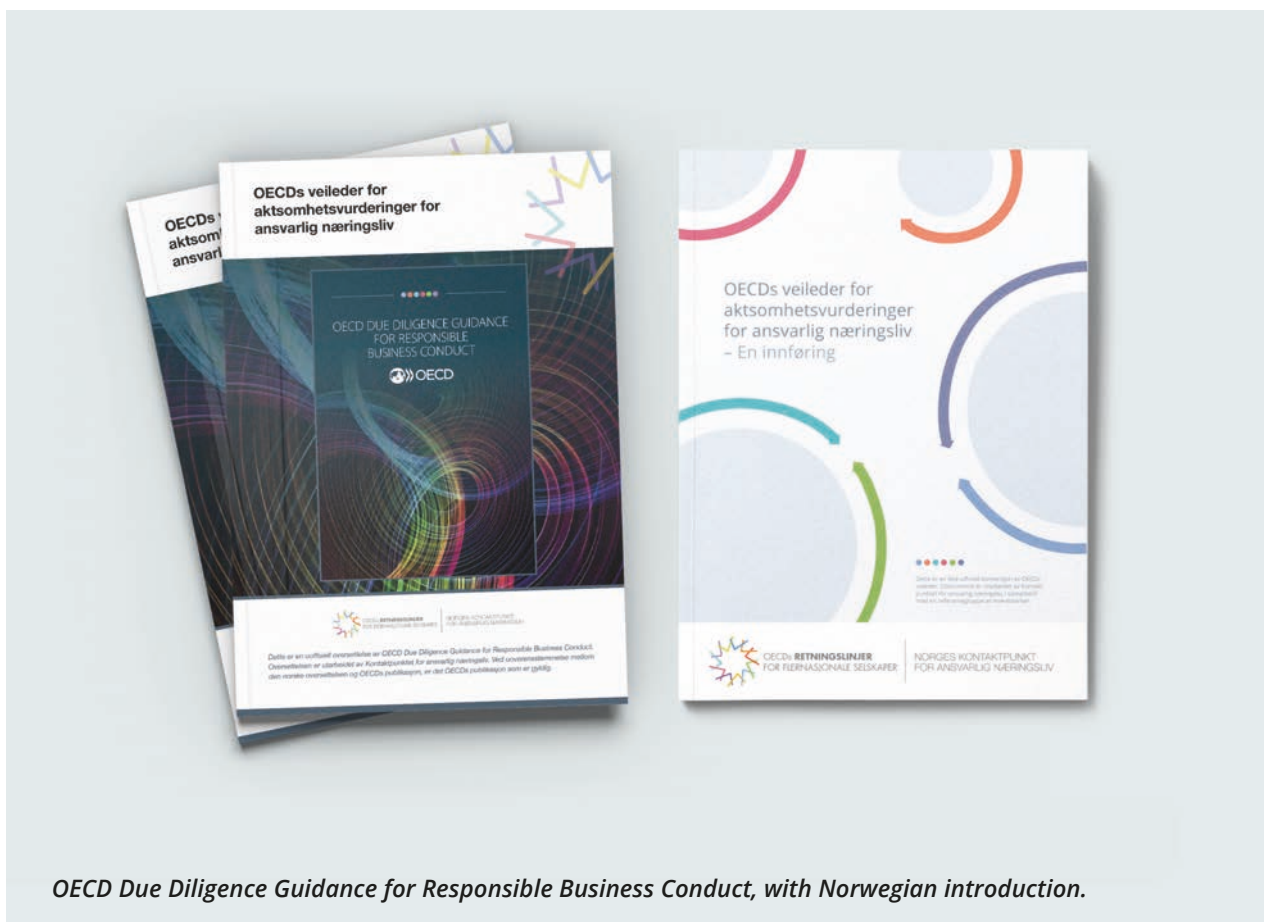


The model illustrates how due diligence is a continuous process that must continue throughout the company's lifetime.

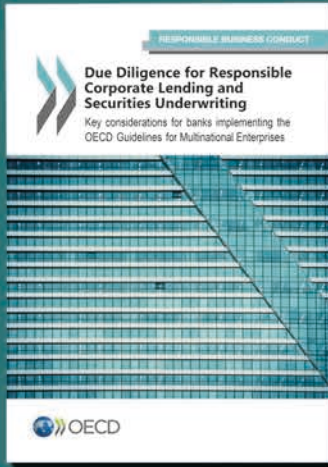
The OECD Guidelines for Multinational Enterprises expects companies to perform due diligence. The goal is to establish whether the company contributes to risk for people, society or the environment, and how harm and negative impact are followed up and communicated to external parties. The company must look at risks arising both from its own activities and through business associates or in the supply chain.

# The OECD's sectoral guidance documents are useful tools for businesses

The OECD has developed sectoral guidance documents that provide concrete and practical advice adapted to different industries. The guidance documents are unique in that they set out recommendations from governments prepared in cooperation with key business representatives from each industry. They focus on stakeholder engagement and also include a unique gender perspective. It is challenging for businesses to familiarise themselves with what is expected of them under the OECD Guidelines, and the sectoral guidance provides useful examples and advice. The NCP promotes the guidance documents at seminars and courses and has translated the full version of the textile industry guidance into Norwegian, in addition to preparing a brief version in Norwegian. The OECD Due Diligence Guidance for Responsible Business Conduct has also been translated in full into Norwegian, and a brief version in Norwegian has been developed for this guidance document. The OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector has been translated from English into the Norwegian and Sami languages.



*OECD Due Diligence Guidance for Responsible Business Conduct, with Norwegian introduction.*



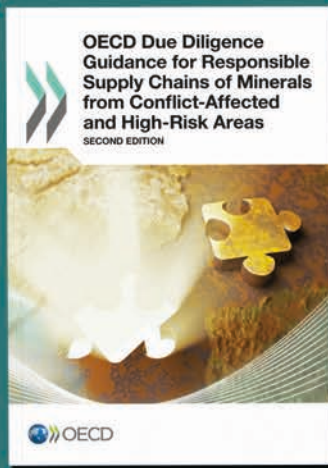
*OECD Due Diligence Guidance for Responsible Business Conduct for General Corporate Lending and Underwriting Securities*



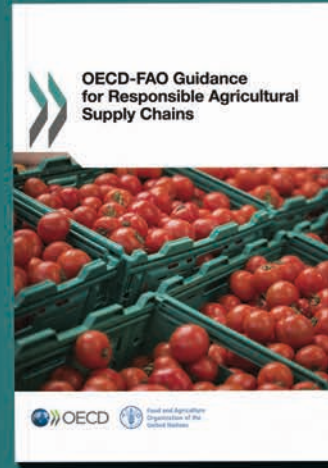
*OECD Due Diligence Guidance for Responsible Business Conduct for Institutional Investors*



*OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector*



*OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*



*OECD Due Diligence Guidance for Responsible Agricultural Supply Chains*



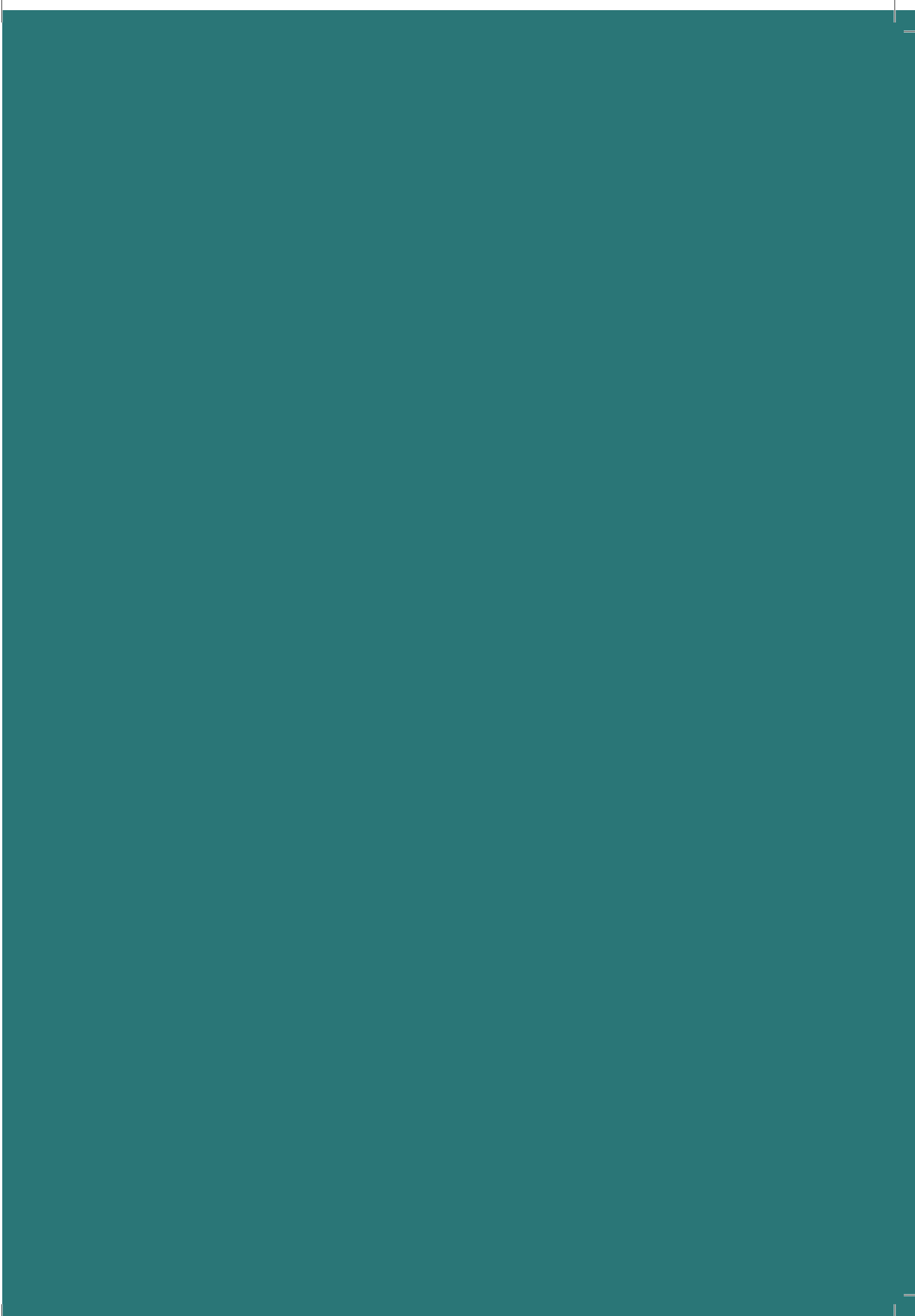
*OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector*





The year 2020 will mark the twentieth anniversary of the National Contact Point system. The system has brought about impressive results in important cases. In the years to come, the NCPs will be able to contribute more and more to responsible business conduct. They will therefore constitute an important mechanism for preventing harm to people, nature and the climate, and thereby to achieving the Sustainable Development Goals.

*Frode Elgesem, Chair of Norway's NCP*







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