Questions for GPs and / or their portfolio companies

GPs may use the following set of questions to help them to make better and more complete decisions and reduce risk. Some questions are general but others relate to specific areas of human rights risk.

General:

- 1. Does the board have any oversight in relation to human rights-related risks and opportunities? If not, why not?
- 2. Does the risk committee or other relevant body have any role in respect of human rights risk? If not, why not?
- 3. Are human rights issues considered in your strategy? If not, why not?
- 4. Do you have a written human rights policy? Is this sufficiently captured by existing ESG policies or other?
- 5. Is the human rights policy fully implemented? Is it integrated into core business processes? If so, how?
- 6. To what extent are human rights captured by existing ESG or risk-related due diligence? Is this sufficient?
- 7. Are bolt-on acquisitions within the portfolio considered?
- 8. What enhanced due diligence (e.g. people due diligence) is undertaken? What does that involved? Could it be improved?
- 9. Is there access to expertise on human rights within the organisation?
- 10. Is there access to expertise within the existing external network of the organisation? Are new specialists required?
- 11. Who has day-to-day (or operational) oversight and responsibility for human rights-related risks and opportunities?
- 12. Which companies (or for portfolio companies which portfolio locations / activities / products / suppliers) are most exposed to human rights risks?
- 13. What particular issues are you aware of? Which stakeholders have you engaged with to come to this conclusion?
- 14. What monitoring processes exist?

Selected issues:

Diversity & Inclusion:

- 1. Do you have a Diversity & Inclusion policy in place?
- 2. What elements are addressed (e.g. flexible working, mental health, anti-harassment and discrimination, parental leave, grievance etc)?
- 3. Do you provide and articulate a business code of conduct, a code of business ethics or similar?
- 4. Do you track the composition of employees (e.g. gender, ethnicity etc)?
- 5. Do you have a formal mentorship program?

- 6. How do you engage with organisations that support companies in respect of diversity and inclusivity?
- 7. Please describe past performance (e.g. claims of sexual or general harassment, misconduct or discrimination).
- 8. What training exists to support staff with diversity and inclusivity?
- 9. What is the current ratio of men/women in management? Has there been any change since last year?
- 10. Please describe how you promote diversity in the workplace.
- 11. Do you have a regular pay benchmarking exercise?
- 12. How do you accommodate for religious beliefs (e.g. prayer room)?
- 13. How do you accommodate for pregnant workers or new parents?
- 14. Is your office accessible (e.g. for wheelchair users)?
- 15. When issues are identified, how are they dealt with? Is there a formal process? Please describe.

Slavery and human trafficking:

- 1. Please describe policy and practice in respect of slavery and human trafficking risk.
- 2. What training has been provided in respect of raising awareness of, and to manage the risk of, modern slavery and human trafficking?
- 3. How would suspected slavery and human trafficking issues be addressed once identified?
- 4. To what extent does the due diligence process look specifically for risks of slavery and human trafficking?
- 5. How are these policies and arrangements communicated to business partners, suppliers and other relevant parties?

Child protection:

- 1. Please describe the child protection policies and practices in place at the company.
- 2. What training has been provided in respect of child protection / child labour risk?
- 3. How would suspected child protection issues or child labour issues be addressed once identified?

Labour rights:

- 1. What labour rights risks have you identified associated with your portfolio / activities / products / suppliers?
- 2. Does the work involve any low skilled, dirty or dangerous work?
- 3. To what extent does the work involve workforces that are migrant, temporary and / or isolated (for example on a ship)?
- 4. To what extent does the work involve countries associated with higher risks of human rights issues (for example those with weak rule of law, those experiencing conflict, turmoil or disaster, those with high levels of poverty, corruption or inequality)?
- 5. What systems and processes do you / your portfolio companies have in place to mitigate these risks and to remediate any labour rights abuses found?
- 6. Do any employment agencies used charge fees to prospective workers?
- 7. What channels are in place for workers to raise concerns, grievances or suggestions or provide feedback? How do you / your portfolio companies ensure they can do so without suffering any negative consequences?

Community and consumer impacts and engagement:

- 1. What are the key risks to communities and consumers due to your / your portfolio companies' operations?
- 2. What systems do you / your portfolio companies have in place to ensure the ongoing assessment of risks to locally affected communities and consumers?
- 3. What management systems do you / your portfolio companies have in place to address these risks?
- 4. How do you / your portfolio companies proactively communicate, engage with and respond to locally impacted communities and/or consumers?

Supply chain:

- 1. What systems do you / your portfolio companies have in place to increase transparency in your supply chains?
- 2. What human rights due diligence (risk assessments, checks, monitoring, etc) is performed throughout the supply chain?
- 3. What human rights requirements/expectations do you / your portfolio companies place on suppliers and subcontractors and how is it ensured that these requirements are met?

Data security:

- 1. Please describe the measures in place to protect / prevent unauthorised access to confidential personal information.
- 2. Please describe the IT security / cyber security elements of this protection / management.