

OUR APPROACH TO HUMAN RIGHTS

Deloitte's approach to human rights is fueled by the UN's Guiding Principles on Business and Human Rights (UNGPs) and tested against relevant country specific requirements.

The UNGP requires corporates to **respect** and **remedy** human rights impacts by:

Developing & implementing a **human rights policy**

Conducting **human rights due diligence** on suppliers, clients, projects & investments

Creating **processes to remediate impacts** that corporates cause or to which they contribute

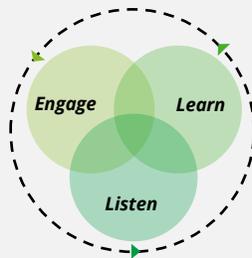


SPECIFIC CONCEPTS EMBEDDED IN OUR APPROACH

Proactively engaging the relevant stakeholders

01

Engage with stakeholders about the **project, business, values, and commitments** to establish trust and understanding among stakeholders



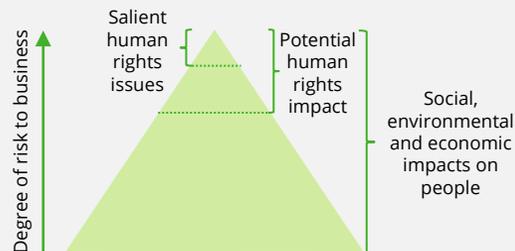
Learn from stakeholder engagement with respect to **what's important to stakeholders** and what the organization should prioritize

Listen to stakeholders to obtain different perspectives and understanding that may **help fill in gaps** and build a more effective strategy

02

Identifying and prioritizing salience in the context of human rights

A company's salient human rights issues are **those human rights that stand out because they are at risk of the most severe negative impact** through the company's activities or business relationships.



This concept of salience uses the lens of **risk to people**, not the business, as the starting point, while recognizing that **where risks to people's human rights are high, there is strong convergence with risk to the business.**



Respecting human rights in business requires determining the potential and actual human rights adverse impacts connected to your business, aligning due diligence with UNGP and OECD requirements, and enacting policies to prevent harm to people throughout the entirety of your value chain.

- 1 Business review
- 2 Identify impacts
- 3 Prioritize saliency
- 4 Assess current state
- 5 Make recommendations

Saliency Assessment

Identify human rights risks with the most severe negative impact to people

Refining Targets

Monitor progress toward goals and determine if targets are still relevant, achievable, and impactful.

- Deepen awareness** of impacts and opportunities
- Understand & **prioritize stakeholder feedback**
- Reevaluate goals** through the lens of rightsholders
- Address issues** and identify ways to improve

Stakeholder Engagement

Decide which stakeholders to engage with, when to engage with them, and how to engage with them.

Leadership Support

Obtain leadership buy-in on commitment to disclose and act on findings and allocation of resources for program development, integration & oversight

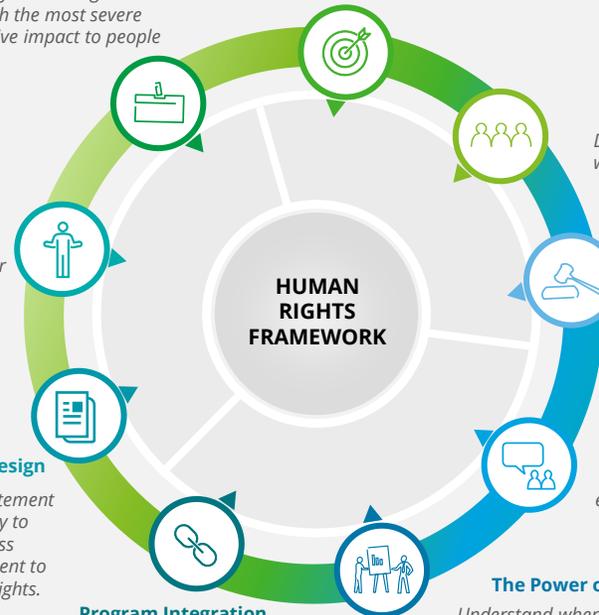
- Communicate** employee expectations
- Integrate** programs to manage risk
- Plan** for disclosure & accountability
- Establish** governance & oversight

Policy Design

Design statement of policy to express commitment to human rights.

Program Integration

Develop procedures and processes to execute on new human rights policy requirements



Reporting & Disclosure

Implement a human rights reporting process to measure and disclose social performance progress

Access To Remedy

Restore victims of human rights abuses and violations, to the extent possible, to their lives and to the enjoyment of their rights before those rights were violated

The Power of Leverage

Understand where the organization has leverage or power to effect change to address human rights impacts

- A company **caused harm** through its operations
- A company **contributed to harm** through its supply chain
- A company is **linked to harm** through its business relationships

OVERVIEW

We support the development, design, and implementation of a standard human rights program in three phases. Deloitte's Risk and Financial Advisory also brings in expertise and specific targeted offerings that will support your efforts to address any human rights and equity challenge throughout your enterprise and value chain.

	PHASE I: Standard and Policy Setting	PHASE II: Tools & Procedures Development	PHASE III: Socialization, Training & Integration	
OBJECTIVE	 <p>Assess current state and conduct policy gap assessment to outline commitment and vision to execute on risks and opportunities through a risk-based approach, aligned to industry leading practices and international standards</p>	 <p>Identify champions, establish communities of practice, and launch workstreams to articulate pathways to effectively meet policy objectives, including the tools, processes, and resources required, leveraging existing infrastructure</p>	 <p>Integrate policy objectives and outcomes into business procedures, practices, systems, and operations through appropriate socialization, training, and change management, and identifying key performance indicators</p>	
	10-12 weeks	10-12 weeks	9-12 months	
OUTPUTS	<ul style="list-style-type: none"> List of relevant, actionable salient risks based on the client's value chain and specific to business area Recommendations for addressing, managing, and mitigating said risks Analysis of relevant laws and regulations per jurisdiction Defined internal policy scope and objectives tied to external reporting and disclosure strategy 	<ul style="list-style-type: none"> Collection of risk-based tools, procedures, and resources aligned to industry leading practices and international standards Business procedures tailored to each impacted business group's location, circumstances, risks, and opportunities Ready resources to support organizations in effective and efficient implementation, management, and governance of policy objectives 	<ul style="list-style-type: none"> Training of employees and business groups affected by policy, on new or changed policy requirements, and tools and procedures developed for human rights Pre-existing administrative operations and systems altered Human right due diligence program(s) implemented Monitoring and enforcement of policy objectives commenced Framework ready for publication 	
DELIVERABLES	<ul style="list-style-type: none"> List of salient human rights risks with recommendations Policy gap assessment Internal stakeholder engagement plan Human rights framework 	<ul style="list-style-type: none"> Human rights risk management policy & business procedures specific to jurisdiction Due diligence questionnaires, risk scoring card & reference materials 	<ul style="list-style-type: none"> Human rights performance indicators, reporting plan & data plan Process for remediation based on risks to employees and customers 	<ul style="list-style-type: none"> Training materials & facilitation plan Data management Governance model Human Rights Framework publication readiness Technology systems management plan External stakeholder engagement plan COE, council & committee charters Escalation protocols Reporting plan



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