

# Investor Expectations on Grievance & Remedy

## Key Insights and Recommendations

Access to remedy<sup>1</sup> remains underexplored in the area of business and human rights and is an often neglected pillar of the UN Guiding Principles on Business and Human Rights (UNGPs) amongst businesses and investors alike. However, there is a strong business case for effective grievance mechanisms and access to and provision of remedy that goes beyond compliance with international human rights norms. Specifically:

- Allegations, insights, and findings from grievances can serve as an early warning system about risks or human rights impacts and can shape and inform human rights due diligence.
- Repairing the relations that led to the grievance - if done appropriately will help to avoid harm, prevent future grievance, build trust and respect, which will enable continuity in business relationships, and reduce legal and reputational risks.

Impacts of corporate activities might include harms such as forced labor, wage theft, attacks on human rights defenders or community impacts around land rights. Ensuring remedy is provided when such harms occur can repair relationships with communities, build trust with employees, promote worker retention or support other productive outcomes between a company and its key stakeholders. Grievance channels may also be a source of useful insights that can enable a company to proactively take steps to address emerging issues, increase productivity and reduce risks, and importantly, lead to avoidance of harm. We propose the concept of “remedy readiness” which is that a company has policies, processes, and provides the resources to receive, investigate, address, and respond to grievances and provide access to remedy if it caused, contributed to, or is linked to a harm through its business activities. Ensuring remedy readiness demonstrates to stakeholders and investors that a company is well-positioned with respect to its human rights responsibilities.

This brief has been developed as a guide on access to remedy to inform corporate practice and investor stewardship on remedy readiness. The scope of this guide is focused on investor use of leverage with investee companies to facilitate remedy and harm reduction. Internal processes related to investor grievance channels or provision of remedy for harm where the investor may have caused or contributed to harm are outside the scope of this resource. The guide is based on desk research, dialogue with experts, and reflections from company engagements. It encompasses the remedy process from human rights impact assessment through to remedy provision. This guide complements other resources designed to support investors in their implementation of the UNGPs, including examples of investors policy commitments, guidance on conducting Human Rights Due Diligence, and stakeholder engagement guidance.<sup>2</sup>

**We hope that this guide will start a conversation and welcome feedback and further examples from our readers.**

Fig. 1

POLICY	DUE DILIGENCE PROCESSES				ACCESS TO REMEDY
Adopt a policy commitment to respect internationally recognised human rights	Identify actual and potential negative outcomes for people, arising from investees	Prevent and mitigate the actual and potential negative outcomes identified	Track ongoing management of human rights outcomes	Communicate to clients, beneficiaries, affected stakeholders and publicly about outcomes, and the actions take	Enable or provide access to remedy

Source: UNPRI, [https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000UnTsZ/PB88jlgjb1LGaVHuaKJjETKTdM-LosAZIktnoDbi\\_xkA](https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000UnTsZ/PB88jlgjb1LGaVHuaKJjETKTdM-LosAZIktnoDbi_xkA)

1. For background on the UN Guiding Principles and Business and Human Rights, and expectations on grievance mechanisms and access to remedy when there are adverse impacts linked to business activity, see Resources included in Appendix below.

2. Why and how investors should act on human rights at <https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000Ung8B/n0joMPEPm21B1ZDsE8g-rC9px8TLRqF8Sw2tvQu8AzrM>; How to identify human rights risks: A practical guide in due diligence at [https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000UnTsZ/PB88jlgjb1LGaVHuaKJjETKTdMLosAZIktnoDbi\\_xkA](https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000UnTsZ/PB88jlgjb1LGaVHuaKJjETKTdMLosAZIktnoDbi_xkA); INVESTOR TOOLKIT ON HUMAN RIGHTS at [https://investorsforhumanrights.org/sites/default/files/attachments/2022-03/Full%20Report-%20Investor%20Toolkit%20on%20Human%20Rights%20May%202020\\_updated.pdf](https://investorsforhumanrights.org/sites/default/files/attachments/2022-03/Full%20Report-%20Investor%20Toolkit%20on%20Human%20Rights%20May%202020_updated.pdf); Investor human rights policy commitments: an overview at [https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000Unq10/qUTmKPqgIUftB\\_vhL9eMpwWL.ieCHP6Z8IT4nvtYa8](https://unpri.my.salesforce.com/sfc/p/#7000000096Rp/a/PL00000Unq10/qUTmKPqgIUftB_vhL9eMpwWL.ieCHP6Z8IT4nvtYa8)

# Principles of Better Practices or Baseline Expectations on Implementation and Demonstration

## 1. Demonstrate remedy readiness with appropriate governance and capacity.

Companies should designate appropriate roles and responsibilities with respect to remedy processes, ensuring responsible staff has human rights expertise and relevant education. This resourcing includes designating who holds responsibility and accountability for impact assessment, decision-making, policy development, implementation, reporting, and oversight. A company should outline protocols for training, compliance, and what steps are taken if there is a violation of human rights. It is also important to have ongoing evaluation of whether a company's resourcing of the relevant processes and functions is commensurate to the size of the risk (severity and likelihood of impacts), with adjustments made as needed.

**Example:** A mining company has an approach to remedy whereby key responsibilities are clearly outlined, with a chain of command, roles and process, a dashboard to monitor effectiveness and conclusions.

## 2. Align Grievance Mechanism with UNGPs and design with rights-holder input.

In addition to meeting the effectiveness criteria outlined by the UNGPs<sup>3</sup>, in order to build trust, support uptake, and demonstrate effectiveness, grievance mechanisms should be developed with input from rights-holders. They should be accessible, gender sensitive, and responsive to culturally specific needs, aware of the unique circumstances of stakeholders. They should be available for all potentially impacted rights-holders, their representatives or credible proxies, both within and outside the company, through multiple communication channels in appropriate languages. Training may be required to ensure that individuals know their rights and are informed of the availability of, and how to use grievance channels. Companies should take into account local context and norms that may relate to use of grievance channels, for example related to interactions with supervisors, integrating grievance channels into existing whistleblower programs, or negative implications associated with writing down complaints.

**Example:** A hardware manufacturer revised its grievance reporting hotline, in consultation with intended users. Adjustments included format, tool, language accessibility, and communication about the tool.<sup>4</sup>

**Red Flags:** Grievance mechanisms which are not fit for purpose or insufficient, such as an internal-only hotline that is only available to personnel and not other stakeholders; no reporting on grievance numbers and/or categories of grievances received; no third party involved in collecting grievances; lack of anonymity, lack of clarity on process, accountability and unclear escalation channels; grievance mechanisms only available in one language (or a small number of languages); technology accessibility challenges; lack of visibility to rights-holder of who to hold accountable.

### UNGP 31, effectiveness criteria for non-judicial grievance mechanisms:

In order to ensure their effectiveness, non-judicial grievance mechanisms, both State-based and non-State-based, should be:

**Legitimate:** enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;

**Accessible:** being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;

**Predictable:** providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;

**Equitable:** seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;

**Transparent:** keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;

**Rights-compatible:** ensuring that outcomes and remedies accord with internationally recognized human rights;

**A source of continuous learning:** drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;

Operational-level mechanisms should also be:  
**Based on engagement and dialogue:** consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.

3. Please see OHCHR Accountability and Remedy Project: Meeting the UNGPs' Effectiveness Criteria ARO III Guidance, available at <https://www.ohchr.org/sites/default/files/2022-01/arp-note-meeting-effectiveness-criteria.pdf>

4. Anonymized examples from company engagement.

### 3. Transparency and disclosure of the process and of the outcomes.

To enhance predictability and effectiveness of grievance mechanisms as a risk management system, companies should develop regular disclosure practices.

#### Good practices for disclosure include reporting on:

- Number and types of grievances received categorized by human rights impact
- Trends over time and by location
- Timeline to resolve grievances
- Status of grievances received and resolved
- Insights on outcomes for impacted rights-holder
- How findings from grievances are used internally for continuous learning and risk assessment
- Feedback from rights-holders on the grievance mechanism
- Evaluation of the effectiveness and accessibility of the grievance mechanism.<sup>4</sup>

**Examples:** One technology manufacturer and platform provides detailed information both on the process to make a complaint, but also details of complaints submitted and how these were remediated with statistics.

NXP, a semiconductor company, publishes detailed Modern Slavery and Human Rights reports, which include detailed coverage of its approach to **grievance mechanisms** and human rights risk identification.

**Red flags:** the lack of grievances should not be taken as evidence of a lack of risks and should be investigated to assess whether any barriers to access or reporting are in place.

### 4. Operate with independence and commitment to non-retaliation.

It is important that grievance channels are free from conflicts of interest and their use does not create risks for rights-holders. Establishment of processes, such as a commitment to confidentiality and a zero tolerance policy for retaliation, are encouraged to ensure protection from reprisals, harassment, discrimination, or retribution from submitting complaints. Companies should identify and address any risks of retaliation against rights-holders who may be in the position to raise legitimate grievances and thus alert the company to unaddressed and/or underappreciated risks. Building trust requires ensuring confidentiality for those who raise issues. It may also require an analysis of the power dynamics between a company and impacted rights-holders, and adapting approaches as necessary to ensure effective processes. It is also important to assess whether instruments such as non-disclosure agreements create potential risks for rights-holders or lead to a fear of retaliation that create barriers to submitting grievances. Public reports on retaliation, such as attacks on human rights defenders, or actions against employees or local communities, can further undermine trust in the company's processes. Companies should ensure that the grievance mechanism operates independently independence from those whose activities may be the subject of grievances and that reporting channels do not risk exposing the complainant to harm or harassment. Where possible, allow the delegation of dispute resolution and decision-making to independent third parties. Appointment of well- qualified personnel to design grievance mechanisms with input from rights-holders and address grievances is essential.

Additionally, companies should incorporate sensitivity towards conflict-affected and high-risk settings into grievance and remedy design to ensure they are fit for purpose in these settings and do not further aggravate existing tensions. When operating in a high-risk context, ensure there is adequate resourcing for grievance channels and a plan for remediation. Companies may consider where it may be valuable to develop mechanisms for collective resourcing and financing where responsibility may be shared among companies, ensuring in advance that there is a clear course of action for how grievances and remediation will be handled.

4. Please see guidance from Shift on outcomes-based reporting for examples of meaningful metrics available at: <https://shiftproject.org/resource/strengthening-the-s-in-esg/>.

**Example:** Actions have been taken to reduce the likelihood of retaliation at a number of companies in the media sector, which have removed gag clauses from employment contracts that had limited the rights for people experiencing harassment to report it. This was done after finding that non-disclosure agreements (NDAs) in practice ended up protecting the perpetrator at the expense of the victim.

**Red flags:** Grievance mechanism fully operated by the company with no disclosure around the associated processes.

## 5. Meaningfully engage rights-holders and incorporate their input into remedy design.

After a harm has occurred, companies should consult with impacted rights-holders to identify the appropriate category(ies) of remedy to make things right. There are many forms of remedy, which include:

- Restitution: measures to restore an affected person or group to their original situation before the harm occurred
- Compensation for harm that can be economically assessed
- Rehabilitation: measures to facilitate a person's recovery from harm (e.g., medical or legal assistance)
- Satisfaction: a broad range of non-financial measures, including cessation of abuse; an apology, declarations restoring the reputation and rights of affected stakeholders; or judicial and administrative sanctions, among others;
- Guarantees of non-repetition, e.g., through corporate policy commitments

Further, if an audit identifies a gap in a system or if there has been an adverse impact, companies should both take corrective action to address the underlying gap or cause of the harm, and also address the concerns of the aggrieved stakeholder. For example, worker concerns about the quality of canteen food communicated through a grievance channel may lead to a further enquiry into working conditions, which might, conceivably, identify the presence of forced labor. Although forced labor risks would need to be addressed as a standalone issue, the original concern (the quality of canteen food) still needs to be addressed in the interest of the worker.

**Example:** A renewable energy company identified forced labour instances in its supply chain in Malaysia through a MSI auditing relationship. The company publicly reported on the matter and worked on a reimbursement plan with a trusted local third party and the service provider to ensure that financial compensation (reimbursement of recruitment fees) was provided to the affected individuals. The company disclosed this and this experience informed its approach to its human rights strategy and partnerships.

Investors recognize that it may be sensitive for companies to discuss specific cases, ongoing controversies or matters subject to litigation, but also see it is important to understand how a company responds. Therefore, it is particularly valuable to have a proactive stance to remedy, outside the context of a specific controversy. Investors note that having a well-developed process and proactive approach can help to resolve controversies in a timely and mutually beneficial manner, while aligning to international human rights norms and standards.

## 6. Respect human rights in the value chain.

Understanding that human rights risks may occur outside of direct operations in the value chain, companies should determine how they will exercise their leverage and what processes they have in place to receive grievances and address them. The breadth of supply chains and challenges for robust monitoring call for different approaches. To support this work, companies are encouraged to:

- Where they are available participate in binding agreements that ensure remedy. Clarify expectations of suppliers to provide remedy and operational level grievance mechanism, use leverage to provide remedy as needed.
- Engage in supplier capacity building and evidence progress through relevant statistics and metrics reflecting supplier assessments. Consider a buyer-supplier mutual code of conduct rather than a one-way code of conduct imposing expectations on suppliers.<sup>5</sup>

5. See guidance from the Ethical Trading Initiative at [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/guide\\_to\\_buying\\_responsibly.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/guide_to_buying_responsibly.pdf) or Responsible Contracting Project, <https://www.responsiblecontracting.org/mccs2-0>

- Use independent third-party unannounced audits as part of their human rights risk management. Engage in on-site visits, direct communication, and other appropriate channels to validate expectations with rights-holders and employees. This can serve to assess awareness of and build trust in grievance channels.
- Embed and effectively leverage multi-stakeholder initiatives or third-party grievance mechanisms in receiving grievances and providing remedy. If a company works with an external party or through a collective channel, in order to be effective these mechanisms should have access to company management, support, financing, and resources which will enable grievances to be resolved and remediated, and the learnings to be incorporated into ongoing human rights due diligence.

**Examples:** The Bangladesh Accord is a multistakeholder initiative and the only legally binding agreement between brands and trade unions on health and safety in the garment industry that emerged in response to the Rana Plaza Disaster in 2013. It includes safety remediation provisions and shared collective resources to finance remediation activities.

**Red flags:** Reliance on supplier self-reporting, questionnaires and use of short audits conducted by commercial partners, do not allow for an in-depth investigation of human rights risks and should not be the only or even primary source of grievance effectiveness and remedy readiness assessment.

### Focus on Worker Rights

It is important for companies to ensure that their workers can have a voice, and that worker grievances can be addressed effectively, without harassment and a threat of retaliation.<sup>6</sup> Companies should therefore recognize and respect the right of workers to form and join a union. Global Framework Agreements and the right to freedom of association and collective bargaining are enabling rights that can help address other workplace risks, such as health and safety or discrimination.

In the workplace, unions represent workers, and in enable them to raise grievances that are collectively experienced in a very structured way. These can be resolved in the workplace in real time - this is particularly impactful, as it reduces the risk of operational and reputational impact of strikes, walkouts and exit(s). Companies should work with unions as appropriate to determine appropriate remediation where grievances are legitimate. Furthermore, the OECD MNE Guidelines clearly state that operational-level grievance mechanisms should not undermine the role of trade unions in addressing labour-related disputes.

Where restrictive domestic laws prevent the forming of trade unions, companies can leverage the OECD Guidelines, which clearly suggest the need to respect workers' freedom of association as much as possible without violating national law. In such cases, companies should seek to engage with other representative worker bodies.<sup>7</sup>

## 7. Consider all potentially affected rights-holders, and prioritize those who are vulnerable or most at risk of severe or irremediable harm

Ensure the grievance mechanism and remedy is appropriately tailored to address the impacts on the vulnerable stakeholders or historically marginalized groups impacted by business.

**Example:** Gender-based violence and harassment are specifically addressed through the binding Dindigul Agreement<sup>8</sup> which operated at apparel factory in India (see recent assessment of the agreement<sup>9</sup>). Kering has a gender-responsive human rights due diligence.<sup>10</sup>

6. Please see Q48 of the UN Access to Remedy in Cases of Business-related Human Rights Abuse: An Interpretive Guide, available at: <https://www.ohchr.org/en/publications/policy-and-methodological-publications/access-to-remedy-bhr-interpretive-guide>

7. Please see the revised OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, available at [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

8. <https://globallaborjustice.org/campaigns/dindigul-agreement-to-eliminate-gender-based-violence-and-harassment-year-2-progress-report/>

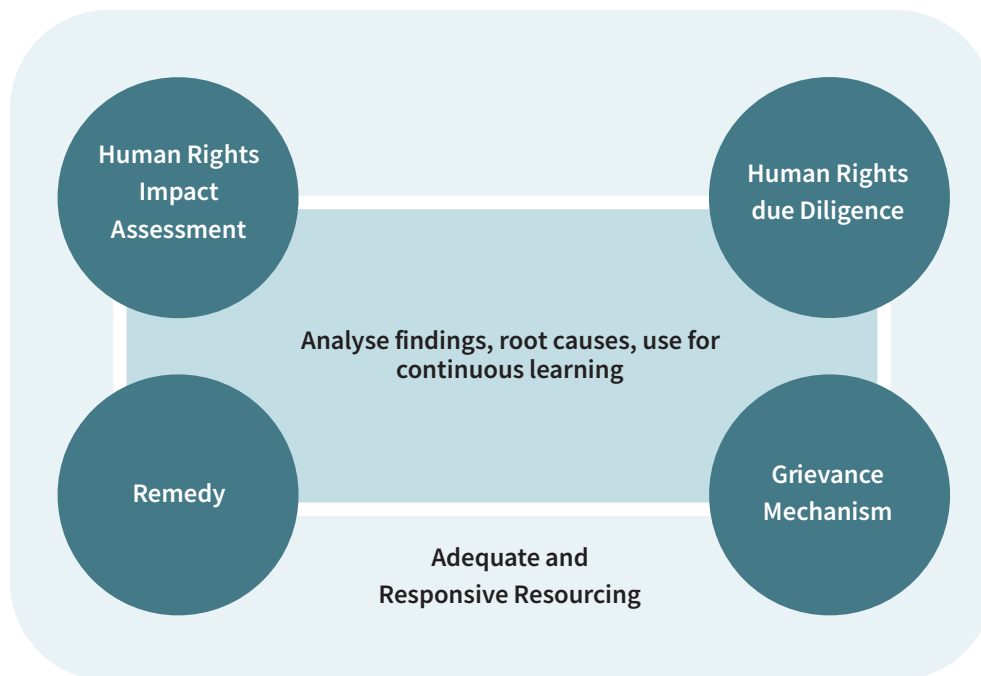
9. [https://globallaborjustice.org/media/uploads/2025/04/Dindigul-Agreement\\_Year-One\\_Progress-Report-2023\\_compressed.pdf](https://globallaborjustice.org/media/uploads/2025/04/Dindigul-Agreement_Year-One_Progress-Report-2023_compressed.pdf)

10. <https://www.worldbenchmarkingalliance.org/publication/gender/companies/kering/>

## 8. Monitoring and Evaluation, Continuous Learning and Root Cause Analysis.

Grievance channels and access to remedy can serve an important role in prevention of adverse human rights impacts, if developed and implemented effectively, with processes to analyze findings and leverage insights. Companies should assess when to conduct root cause analysis and regularly analyse trends in grievances to identify emerging risks, areas of concern, or gaps in due diligence processes. These learnings should then be used to revise the relevant policies and grievance mechanisms themselves. This analysis can also help a company fulfill a guarantee for non-repetition of harms. This commitment can be reinforced through disclosures that provide an analysis of grievances received and how they were resolved, and can provide insight to investors and stakeholders on where remediation sits within a company's approach to human rights due diligence. This transparency and learning environment demonstrate that the grievance mechanism is credible, which can help to build trust and support positive relationships with key stakeholders. There is not necessarily an expectation among investors and stakeholders that a company will have no adverse impacts, and instead, transparency and learning from the negative impacts associated with the company's business demonstrates effective risk oversight and a commitment to improvement.

Fig. 2



Source: Authors

Note: The figure above demonstrates interconnectedness between human rights impact assessments (HRIAs), human rights due diligence (HRDD), grievance mechanisms and access to remedy. Grievance mechanisms and access to remedy are not intended to replace HRDD but instead contribute across multiple steps of ongoing HRDD. For instance, grievance mechanisms are part of operationalising remedy, and HRIAs are part of HRDD. Throughout the entire process, adequate resourcing and regular analysis of findings support this integration

# Suggested Engagement Questions:

## **Remedy Readiness Resources, Responsibilities and Governance of Grievance and Remedy**

- Who has responsibility for oversight of management of internal and operational grievance mechanisms and access to remedy? How is this work resourced/financed?
- What kind of oversight does the board have to remedy and controversies? Does this team have human rights expertise (please define)?
- Can you outline the process through which grievances are received by your company?
- How do you evaluate your readiness to provide remedy?
- Is the company proactively developing approaches to provide access to remedy?

## **Grievance Mechanism Design**

- Have you consulted with stakeholders to ensure the grievance mechanism is accessible, legitimate, and rights-compatible, and that the process for access to remedy is accessible?
- Can you provide any examples of how stakeholder feedback had been incorporated into the design of your grievance and remedy mechanisms?

## **Transparency Through Reporting of Grievances and Outcomes**

- Do you collect data on the number of worker grievances in and their categories?
- Can you share more information on the nature of the grievances, how many were related to human rights issues, what is the process for investigation, and the timeline to review and address a complaint?

## **Independence and Non-Retaliation**

- What are the key policies and processes in place to mitigate the risks of retaliation?
- Is the grievance mechanism operated by an independent entity or third party? How do you evaluate potential conflicts of interest and mitigate these risks?

## **Provision of Remedy**

- Can you share examples of when you have provided remedy when you caused, contributed or been linked to a negative human rights outcome? Can you share any learnings from that?

## **Grievance and Remedy in Supply Chains**

- Do you engage with and train your suppliers on grievance mechanisms and access to remedy?
- Do you monitor the number of worker grievances across your supply chain and their categories?
- How do you address access to remedy in the supply chain where your activities may be directly linked to negative human rights impacts?
- What do you do if you don't have sufficient leverage to ensure remedy?
- If there are multiple parties involved in a controversy in your supply chain, how do you address joint responsibilities and shared leverage to ensure remedy is provided?

## Rights-holder Focus and Consideration of Vulnerable Groups

- Would you be able to share your process for assessing adverse impacts on rights-holders and how this assessment informs the design of your grievance mechanism(s) and approach to remedy?
- Do you incorporate a gender-sensitive lens in the remediation process?
- What measures are in place to meet the needs of vulnerable and marginalized populations (e.g. children, people with disabilities, Indigenous Peoples, human rights defenders, migrants), which may be at heightened risk or face unique barriers to access?

## Monitoring and Evaluation, Continuous Learning and Risk Management

- How do you assess the effectiveness of grievance systems and along what criteria?
- How are insights from the grievance channel and remediation used as a source of continuous improvement and learning?

## Key Resources on Access to Remedy and Grievance Mechanisms:

- Access to remedy in cases of business-related human rights abuse: An Interpretive Guide: <https://www.ohchr.org/sites/default/files/documents/issues/business/access-to-remedy-bhr-interpretive-guide-advance-version.pdf>
- OHCHR Accountability and Remedy Project: Meeting the UNGPs' Effectiveness Criteria: <https://www.ohchr.org/sites/default/files/2022-01/arp-note-meeting-effectiveness-criteria.pdf>
- The Shift Project: Improving Accountability and Access to Remedy for Victims of Business-Related Human Rights Abuse: <https://shiftproject.org/resource/improving-accountability-and-access-to-remedy-for-victims-of-business-related-human-rights-abuse/>
- Corporate Human Rights Benchmark Methodology: <https://www.worldbenchmarkingalliance.org/corporate-human-rights-benchmark/>
- Electronics Watch – Principles for Worker-Driven Remedy: [https://electronicswatch.org/en/worker-driven-remedy-principles\\_2626987](https://electronicswatch.org/en/worker-driven-remedy-principles_2626987)
- Remedy For Human Rights Violations in Global Supply Chains: Essential Elements: [https://electronicswatch.org/remedy-for-human-rights-violations-in-global-supply-chains-essential-elements-july-2022\\_2618868.pdf](https://electronicswatch.org/remedy-for-human-rights-violations-in-global-supply-chains-essential-elements-july-2022_2618868.pdf)
- Nomogaia – Access to Remedy resources: <https://nomogaia.org/access-to-remedy/>
- Drimmer, J. C., & Laplante, L. J. (2015). The third pillar: Remedies, reparations and the Ruggie principles. The business and human rights landscape: Moving forward, looking back. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2988574](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2988574)

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