BEYOND COMPLIANCE: BUILDING RIGHTS-CENTRED AND RESILIENT SUPPLY CHAINS



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FOREWORD

This report, Beyond Compliance: Building Rights-Centred and Resilient Supply Chains in East & Horn of Africa, is the outcome of the second East & Horn of Africa Business and Human Rights Dialogue, held in Nairobi in June 2026. The Dialogue brought together international, regional and national actors to explore progress made, and the challenges that remain, in addressing human rights impacts of land-based investments and their implications for responsible investment, supply chains and inclusive economic development in the region. It was my absolute honour on behalf of the United Nations Working Group on Business and Human Rights to attend the Dialogue and deliver a keynote address to such an august gathering.

The Dialogue, as well as this report, could not have been more timely. This year, we mark the 15 years anniversary of the United Nations Guiding Principles on Business and Human Rights (UNGPs), the authoritative statement of what responsible states, businesses and other actors must do to advance responsible business practice in all key economic sectors. As we reflect on progress made over the last 15 years in raising awareness on the UNGPs across the region and beyond, the report highlights essential tasks ahead for us to move from awareness and commitments to the UNGPs, towards accelerated implementation. Investments in land-based sectors, such as food, agriculture, extractives and conservation can drive economic growth, food security, jobs and climate action. Yet they also present significant risks to workers, communities, Indigenous Peoples, consumers and human rights defenders if not managed responsibly, in alignment with the UNGPs.

The adoption of National Action Plans on Business and Human Rights (NAPs) in Kenya and Uganda marks important progress, yet the complexity of business and human rights challenges requires even more countries across the region to also adopt NAPs, as well as advance clear and comprehensive legal and governance systems that foster business respect for human rights at all levels. Countries developing or updating NAPs should seize this opportunity to ensure genuinely inclusive processes, through a whole-of-society approach that promotes collaboration among governments, businesses, national human rights institutions (NHRIs), civil society organisations, human rights defenders, faith-based actors, development partners and rights holders themselves.

The East Africa experience demonstrates the value of regional convenings that allow stakeholders to identify shared challenges, address cross-border risks and exchange practical solutions. Its role is pivotal, not only in fostering knowledge and leadership, but also in connecting regional priorities to global agendas. We hope that other subregions across Africa and beyond would evolve similar models that deepen homegrown solutions, knowledge exchange, and rights-holder perspectives.

I recommend this report to all stakeholders interested in advancing responsible investments and business operations that place people and planet above profit. It goes further than introducing the topic in the region. It examines the roles of diverse actors, presents recent policy developments and practical experiences that demonstrate how law can foster a risk-based and context-sensitive approach to human rights due diligence and responsible supply chain management. Particularly noteworthy is that while the cases draw primarily from East and Horn of Africa, the incisive recommendations provided are timely and relevant for broader continental and international developments and emerging practice on business and human rights in the decades ahead.

Finally, I extend my sincere appreciation to the entire DanChurchAid team for their outstanding dedication and commitment to supporting the translation of international standards on business and human rights into practice across Africa and beyond. Special thanks also to all collaborators and partners that have contributed to the success of the Dialogue and this report.

Professor Damilola S. Olawuyi, SAN
Member from African States
United Nations Working Group on Business and Human Rights



ABOUT THIS REPORT

This report brings together experiences, lessons and perspectives from stakeholders working to advance responsible business conduct and business and human rights across East and Horn of Africa. The purpose of this report is to share practical experiences, lessons, dilemmas, and emerging practices related to the implementation of responsible business conduct to contribute to ongoing discussions on environmental and human rights due diligence, responsible investment, access to remedy, stakeholder engagement and, sustainable social and economic development.

The report builds on discussions held during the second East & Horn of Africa Business and Human Rights Dialogue, convened in Nairobi in June 2026, that brought together businesses, business associations, civil society organisations, rights-holders, NHRIs, youth networks, faith-based actors, media, public institutions, development partners and international organisations to exchange experiences, discuss emerging challenges and explore opportunities for strengthening responsible business conduct in the region.

Rather than presenting a single model or set of answers, the report is intended as a space for shared learning. The cases reflect different contexts, stakeholder perspectives, priorities and approaches, while highlighting practical experiences seeking to translate international standards, policy commitments and responsible business conduct principles into practice. As such, the report is intended as a resource for businesses, investors, policymakers, civil society organisations and other practitioners interested in concrete case examples on responsible business conduct challenges, implementation and approaches.

The report combines an introductory analysis prepared by DanChurchAid with case contributions authored by organisations participating in the dialogue and related engagements e.g. the pre-dialogue workshop for private sector.

Together, they offer insights into how stakeholders are responding to evolving expectations and translating principles into practice. By presenting these perspectives side by side, the report contributes to a broader conversation about how responsible, inclusive and sustainable business ecosystems can be strengthened across the region and beyond. The recommendations draw on lessons emerging from the dialogue, the case contributions, DCA's own experiences and relevant research. The views expressed in the individual cases remain those of the respective authors and organisations, who are responsible for the information, data and references presented.

METHODOLOGY

This report draws on two primary sources: discussions from the East & Horn of Africa Business and Human Rights Dialogue and practitioner-led case submissions from organisations working across the region. The introductory analysis and synthesis have been prepared by DanChurchAid (DCA) and draw on dialogue discussions, case experiences and relevant policy developments. The cases are used as perspectives on recurring implementation questions rather than as stand-alone examples. The report does not seek to provide a comprehensive assessment of responsible business practice across East and Horn of Africa. Rather, it aims to contribute practical insights and lessons related to implementation across different sectors and contexts.

This report is part of DCA-facilitated case compilation series, including Bringing Principles into Practice (2023), The Business Case for Food Systems Change (2024) and Joining Forces for a Just Transition (2025). This report takes stock in a time where the policy landscape and RBC discussions has changed and evolved rapidly over the last couple of years centres on a question that is becoming increasingly relevant for businesses, policymakers, investors and practitioners alike: what enables responsible business conduct to move from commitment to implementation in practice?



ABOUT DANCHURCHAID (DCA)

DCA is a Danish humanitarian and development organisation working across Africa, Asia, the Middle East and Ukraine. Through humanitarian action, long-term development support and advocacy, DCA works with civil society, faith-based actors, public institutions and private sector partners to promote human rights, economic inclusion, decent work, resilient livelihoods, sustainable food systems, accountable governance and climate-resilient development. Guided by a human rights-based approach and a strong commitment to local leadership, DCA invests in partnerships and collective action that contributes to more resilient communities, inclusive market systems, and sustainable and just development outcomes.

Business and Human Rights is an integral part of DCA's broader approach to advancing resilient market systems, responsible investments and inclusive economic development. DCA promotes the implementation of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Responsible Business Conduct through practical approaches that strengthen accountability, participation and sustainable business practices. Human Rights and Environmental Due Diligenc serves as a key operational approach within DCA's private sector engagement, helping to ensure that business activities, investments and market system interventions respect human rights, do no harm and contribute to positive social, environmental and economic outcomes.

Across East and Horn of Africa, DCA supports the translation of international Business and Human Rights standards and policy commitments into practice through programmes, partnerships, policy engagement and multistakeholder dialogue. By convening businesses, rights-holders, investors, public institutions, civil society organisations and other market actors, DCA facilitates dialogue, partnerships and collective action around shared implementation challenges. This includes advancing risk-based due diligence, meaningful stakeholder engagement, responsible investment, access to remedy and locally led solutions that strengthen accountability, resilience, inclusive economic opportunities and sustainable development outcomes. Through these efforts, DCA seeks to bridge global standards and locally led approaches while supporting more responsible business practices and sustainable market systems.

Further information on DCA's work on Business and Human Rights can be found at: Business and Human Rights - DanChurchAid.org

ACKNOWLEDGEMENTS

This report brings together case contributions from organisations that participated in the second East & Horn of Africa Business and Human Rights Dialogue and related engagements. These include: United Nations Development Programme (UNDP), Ethiopian Horticulture Producer Exporters Association (EHPEA), Agency for Minority Rights and Development (AMARD), the Cultivating Justice Partnership (Centre for Education Policy and Climate Justice (CEPCJ), Pamoja Trust and DanChurchAid), Fellowship of Christian Councils and Churches in the Great Lakes and Horn of Africa (FECCLAHA), Swedwatch and Act Church of Sweden, Indigenous Movement for Peace Advancement and Conflict Transformation (IMPACT), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), Pan-African Youth Alliance on Business and Human Rights (PAYA-BHR), Global Compact Network Kenya (GCNK) and Witness Radio.

From DCA, Roya A. Z. Høvsgaard, Joanne Kirimi, Cathrine Barklin, Nicole Marie Pemberton and Meng Chi Yu have drafted, edited and compiled the report.

The East & Horn of Africa Business and Human Rights Dialogue was co-convened by DCA, the United Nations Development Programme (UNDP), the Network of African National Human Rights Institutions (NANHRI), Global Compact Network Kenya (GCNK) and the Office of the United Nations High Commissioner for Human Rights (OHCHR). The dialogue was also organised in collaboration with the African Coalition for Corporate Accountability (ACCA), ACT Alliance, Danish Family Planning Association, Danish Industry East Africa, Resource Rights Africa, the Centre for Education Policy and Climate Justice (CEPCJ), Pamoja Trust and Witness Radio.

DCA would like to express sincere appreciation to all organisations, partners, contributors and participants who have helped make this report possible, including the member for African states in the Working Group on Business and Human Rights, Professor Damilola S. Olawuyi, SAN for participating in the dialogue and authoring a foreword for the report. We are also particularly grateful to the authors of the case contributions for sharing their experiences, reflections and lessons, and to the participants of the second EHABHR Dialogue for their openness, engagement and commitment to shared learning. The diversity of perspectives represented in this report reflects a collective commitment to advancing responsible business conduct and translating principles, policies and standards into practice. We hope these contributions will help inform and inspire continued dialogue and action across the region and beyond.

Finally, we gratefully acknowledge the support of the Danish Ministry of Foreign Affairs, whose support made both the dialogue and this report possible.

ABBREVIATIONS

ABHRF	African Business and Human Rights Forum
ACHPR	African Commission on Human and Peoples' Rights
AfCFTA	African Continental Free Trade Area
AJS	Alternative Justice Systems
BHR	Business and Human Rights
CGRM	Community-Led Grievance Redress Mechanism
CSRD	Corporate Sustainability Reporting Directive
CSDDD	Corporate Sustainability Due Diligence Directive
EHABHR	East & Horn of Africa Business and Human Rights
ETI	Ethical Trading Initiative
EUDR	EU Deforestation Regulation
EUFLR	EU Forced Labour Regulation
FPIC	Free, Prior and Informed Consent
HHRDD	Human Rights Due Diligence
HREDD	Human Rights and Environmental Due Diligence
ILO	International Labour Organization
NAP	National Action Plan on Business and Human Rights
NHRI	National Human Rights Institution
RBC	Responsible Business Conduct
UNGPs	United Nations Guiding Principles on Business and Human Rights
UNWG	United Nations Working Group on Business and Human Rights



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INTRODUCTION

The year 2026 marks two important milestones for the business and human rights (BHR) agenda: the 15th anniversary of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the 50th anniversary of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). Together, these frameworks have shaped the standards, expectations and practices that guide how governments, businesses and investors address the impacts of economic activity on people, communities and the environment.

At the same time, the context in which responsible business conduct (RBC) is implemented continues to evolve. Expectations are increasingly shaped by a combination of regulatory developments, investor requirements, commercial relationships, public policy initiatives, grievance mechanisms and stakeholder engagement processes. For many organisations, RBC is no longer driven by a single framework or compliance obligation, but by a broader ecosystem of actors, incentives and accountability mechanisms operating across local, national, regional and international levels[1]. The experiences presented throughout this report illustrate how businesses, governments, civil society organisations (CSOs), investors and rights-holders are navigating these evolving expectations in practice, and what this means for responsible investment, supply chains and sustainable economic development across East and Horn of Africa.

The title Beyond Compliance reflects a growing recognition that compliance, while important, is rarely sufficient on its own to prevent harm or contribute to meaningful and lasting change. Increasingly, attention is shifting from whether commitments exist to how they are implemented, experienced and sustained in practice. Regulation plays a critical role in setting expectations, clarifying responsibilities and strengthening accountability, but standards and commitments only matter if they influence decisions, relationships and practices where risks to people and the environment are greatest. The questions explored in this report were discussed by more than 120 participants representing businesses, business associations, governments, National Human Rights Institutions (NHRIs), civil society, faith actors, youth networks, investors, development partners and international organisations during the second East and Horn of Africa Business and Human Rights Dialogue (EHABHR Dialogue). Across the discussions, a recurring theme emerged: while awareness of BHR frameworks continues to grow, the challenge increasingly lies in implementation, accountability and translating commitments into practice. Translating commitments into practice is rarely straightforward, and that no single approach works across all contexts. Businesses and other market actors operate in environments shaped by different risks, stakeholders, power dynamics and socio-economic conditions. What works in one setting may not work in another.

[1] United Nations. (2011). Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework. New York and Geneva: United Nations; Organisation for Economic Co-operation and Development (OECD). (2023). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Paris: OECD Publishing.

The UNGPs and OECD Guidelines describe due diligence as an ongoing process through which businesses identify, prevent, mitigate and address adverse impacts linked to their operations, supply chains and business relationships. Challenges often emerge when businesses, investors, public institutions, CSOs and rights-holders navigate changing risks, competing priorities and complex operating environments. Meaningful stakeholder engagement, access to remedy, accountability mechanisms, trust and ongoing dialogue between affected stakeholders, businesses, investors and public institutions often shape whether due diligence translates into improved outcomes in practice. Ultimately, RBC is not only about managing risks. It is also about how different actors can work together to navigate shared challenges and contribute to more inclusive, resilient and sustainable market systems that contribute to more inclusive, resilient and sustainable development outcomes for people, economies and the environment.

Moving beyond compliance therefore requires more than understanding standards and frameworks alone. It requires understanding how these correspond to and eventually interact contextually, with market dynamics and the perspectives of those affected by business activities. **By bringing together concrete cases, reflections and lessons from across the East and Horn of Africa region, this report seeks to contribute to dialogue and learning on both the challenges and opportunities involved in advancing RBC in practice.** In doing so, it aims to support strengthen implementation, build trust and contribute to more responsible, inclusive and resilient market systems.

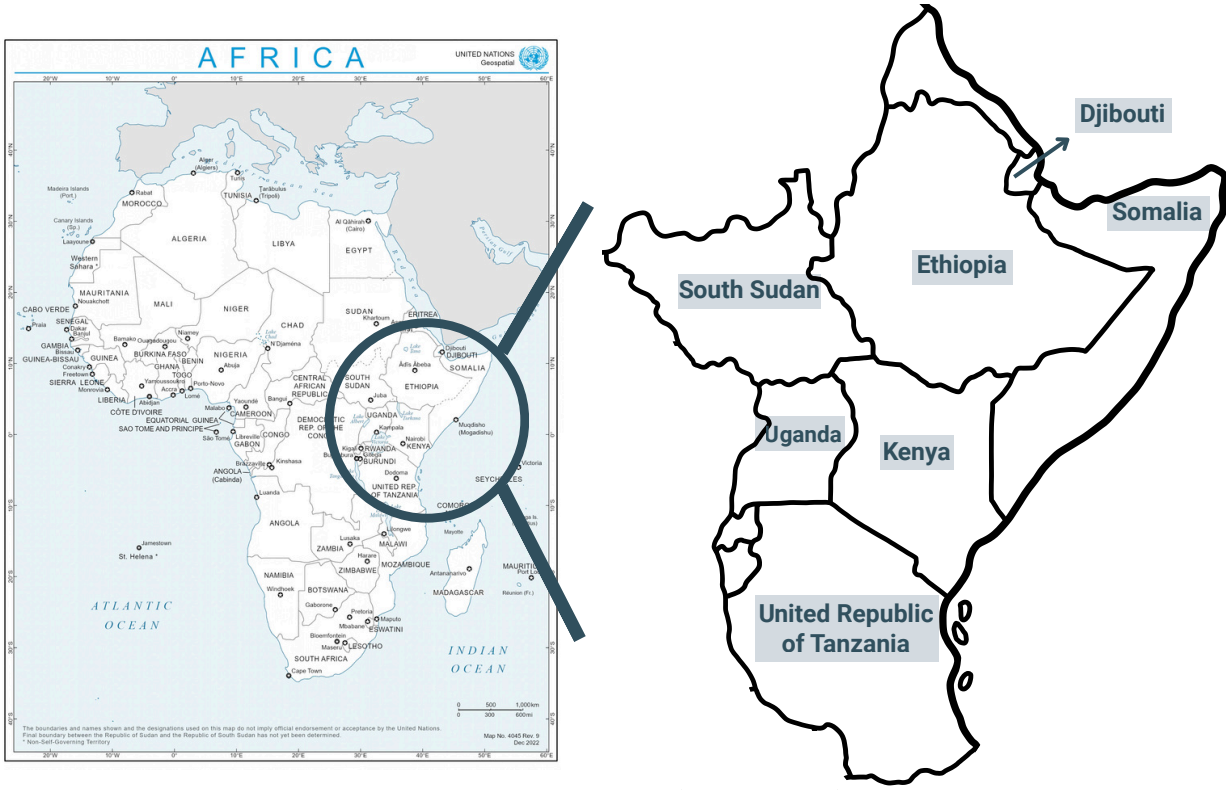


Figure 1. Countries Discussed Throughout This Publication and the EHABHR Dialogue
Note: Highlighted countries represent those referenced throughout the publication.
Source: Authors' illustration based on United Nations Geospatial Africa map.

Why This Matters Now?

Across East and Horn of Africa, growing investments in agriculture, food systems, renewable energy, infrastructure and extractive industries are creating new opportunities for economic transformation. **At the same time, expanding value chains, increasing investment flows and deeper regional integration are bringing renewed attention to how business activities affect people, communities and the environment.** This comes at a time when RBC is gaining greater prominence across regional, national and international policy discussions, investment frameworks and business practices. As regulatory expectations evolve and implementation efforts accelerate across different contexts, questions of accountability, responsible investment, participation and access to remedy are becoming increasingly important. As a result, the conversation is shifting from whether RBC matters to how it can be implemented in practice.[2] For businesses, investors, governments and CSOs alike, the challenge is to

Looking Ahead

The chapters that follow explorcfre43ue how evolving expectations related to RBC are being interpreted and implemented across East and Horn of Africa. Drawing on dialogue discussions, policy developments and practitioner experiences, the report examines a set of recurring implementation questions related to risk prioritisation, stakeholder engagement, accountability, remedy and responsible investment. Through contributions from businesses, rights holders, CSOs, public institutions and other practitioners, it explores how commitments are translated into decisions, relationships and outcomes in practice. Rather than promoting a single model for implementation, the report brings policy, dialogue and practice into conversation with one another to examine a central question that runs throughout the report: **What does it take to turn commitments into action?**

[2] African Union. (2015). Agenda 2063: The Africa We Want; African Continental Free Trade Area Secretariat. (2018). Agreement Establishing the African Continental Free Trade Area (AfCFTA); Organisation for Economic Co-operation and Development (OECD). (2023). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Paris: OECD Publishing.

2 Evolving Expectations in a Changing Landscape

Since the first EHABHR Dialogue was convened in 2023, new regulations, investor expectations, policy initiatives and implementation tools have added further dimensions to ongoing discussions about how environmental and human rights risks are identified, managed and addressed in practice.

Much attention has focused on developments coming from the European Union (EU) such as the Corporate Sustainability Due Diligence Directive (CSDDD), the Corporate Sustainability Reporting Directive (CSRD), the EU Forced Labour Regulation (EUFLR), the Deforestation Regulation (EUDR) and the Battery Regulation (EUBR). While implementation timelines vary, most of these measures are already in force or will become applicable in the near future, significantly reshaping expectations for companies operating in global value chains. Together with the 2023 revision of the OECD Guidelines and ongoing guidance developed by the United Nations Working Group on Business and Human Rights, these developments have strengthened expectations related to due diligence, transparency, stakeholder engagement and accountability. **Beyond legislation and international standards, businesses also face expectations through procurement systems, investor requirements, financing arrangements, public policy initiatives such as National Action Plans on Business and Human Rights (NAPs), grievance mechanisms and stakeholder engagement processes.** This aligns with the UNGPs' call for a smart mix of measures to support business respect for human rights. The practical question for businesses, governments, NHRIs, CSOs and rights-holders is therefore not whether expectations exist, but how they are interpreted, prioritised and translated into practice.

	Voluntary	Mandatory
Internatioal	International voluntary standards and guidance (e.g. UNGPs, OECD Guidelines for Multinational Enterprises, ILO MNE Declaration)	International treaties and conventions (e.g. UN human rights treaties, ILO Conventions, binding upon ratification by states)
National	National guidance, NAPs, incentives, and industry initiatives	National legislation, regulations, and enforcement mechanisms

Table 1. Illustrative representation of the UNGPs' smart mix of measures.
Source: Author's illustration based on Guiding Principles on Business and Human Rights (OHCHR, 2011).

Currently, new guidelines are also emerging to support navigating due diligence requirements and ensuring the requirements are grounded in relevant contexts. In June 2023, the OECD Guidelines for multinational enterprises was updated with increased expectations related to climate change, biodiversity, technology and AI, stakeholder engagement, the protection of human rights defenders, responsible disengagement, anti-corruption efforts, and risk-based due diligence. The adoption of CSDDD has reinforced the centrality of the OECD Guidelines and UNGPs, drawing heavily on the OECD six-step due diligence process and UNGPs risk-based due diligence principles. As a result, OECD Guidelines and UNGPs are becoming not only soft law but also a practical reference for legal compliance. Additionally, the UN Working Group on Business and Human Rights (UNWGBHR) have published reports on issues relating to AI, labour migration, Indigenous Peoples and Free, Prior and Informed Consent (FPIC), and more recently agribusiness and food systems.

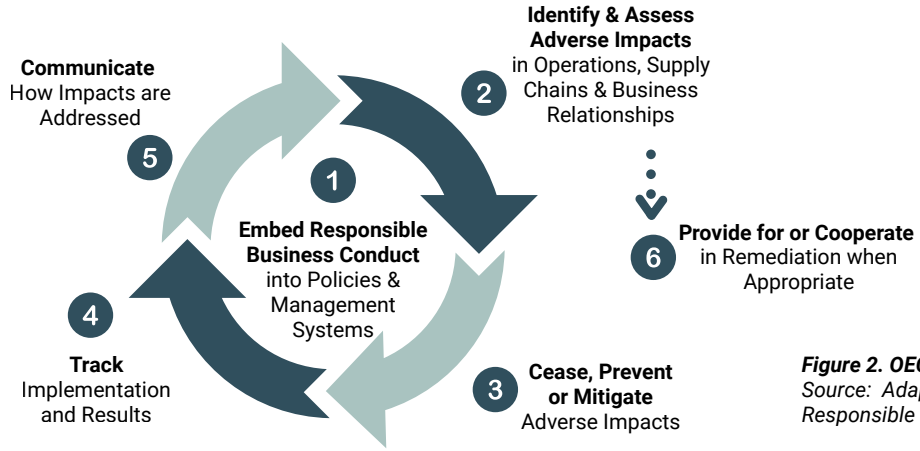


Figure 2. OECD six-step due diligence process. *Source: Adapted from OECD, Due Diligence for Responsible Business Conduct.*

In response to ongoing conflicts, forced displacement and fragile governance contexts, growing attention is also given to how human rights and environmental due diligence can be adapted to conflict-affected and high-risk environments. In these contexts, risks can be harder to identify, stakeholder engagement may be constrained, and those most affected by business activities are often the hardest to reach through conventional due diligence processes. Building on the UNGPs and OECD guidelines, a growing body of practice and guidance has emerged around heightened approaches to HREDD, including through the OHCHR and UNDP Guidelines for Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts developed with the UNWGBHR and other practice-based examples such as the Joint Ethical Trading Initiatives case compilation on Human Rigths Due Diligence in Challenging Contexts.[3,4]

[3] United Nations Development Programme (UNDP), Office of the United Nations High Commissioner for Human Rights (OHCHR), and United Nations Working Group on Business and Human Rights. (2025). Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide.
[4] Ethical Trading Initiative (ETI). (n.d.). Human Rights Due Diligence in Challenging Contexts.

Why These Developments Matter in East and Horn of Africa

Questions related to implementation are particularly relevant in East and Horn of Africa, where businesses and producers are closely connected to regional and international markets through land-based sectors such as agriculture, renewable energy, mining, infrastructure and manufacturing. For many businesses in the region, evolving expectations are felt less through direct legal obligations and more through changing relationships with buyers, financiers, investors and international markets. **The EU remains an important export destination for several countries in the region and as supply-chain due diligence expectations are being formed and ready for implementation, requests related to traceability, supplier management, labour standards and environmental performance are increasing.**[5] Risks associated with land-based investments are also well documented across sectors. These include land acquisition and displacements, inadequate consultation and consent processes, adverse impacts on Indigenous Peoples and local communities, labour rights violations, environmental degradation, pressures on water and natural resources, food insecurity, and inequitable distribution of economic benefits.

Country	EU Rank	EU Share
Ethiopia	#1	22.1%
Kenya	#1	13.6%
Uganda	#2	17.1%
Djibouti	#2	4.3%
Tanzania	#3	9.3%
South Sudan	#7	0.3%
Somalia	#8	0.7%

Table 2. EU share and ranking as an export destination in selected East and Horn of Africa countries (2025).
Source: European Commission Directorate-General for Trade and Economic Security. (2025). Trade in Goods Country Factsheets (Djibouti, Ethiopia, Kenya, Somalia, South Sudan, Tanzania and Uganda).

In fragile and conflict-affected settings, such risks are often shaped by complex political, social and economic dynamics, including historical grievances, unequal access to resources, and competing claims over land and natural resources. At the same time, when investments are managed responsibly and benefits are shared more equitably, these sectors can create significant opportunities for economic development, employment and poverty reduction.

[5] European Commission Directorate-General for Trade and Economic Security, Trade in Goods Country Factsheets (Djibouti, Ethiopia, Kenya, Somalia, South Sudan, Tanzania and Uganda, 2025).

Realising these opportunities requires businesses to understand how local institutions, customary systems and community governance mechanisms interact in practice, as these form an important foundation for responsible investment. **In many contexts across East and the Horn of Africa, existing governance and community-based mechanisms already play an important role in identifying concerns, facilitating participation and shaping decisions related to land and natural resource use.** For example, Dr. Dorcas Basimanyane from the Centre for Human Rights at University of Pretoria highlights that African human rights jurisprudence has increasingly emphasised the importance of meaningful participation in investment-related decision-making.[6] It illustrates a shift from consultation alone towards more effective participation and FPIC in relation to Indigenous lands, while also underscoring the importance of equitable benefit-sharing arrangements for affected communities.

These developments suggest that understanding local governance systems, stakeholder perspectives and existing community-based mechanisms is an important part of responsible investment. Such understanding can help businesses identify and address risks more effectively, strengthen relationships with affected stakeholders and ensure that due diligence processes are better aligned with the context they operate within.

This broader understanding of how risks can be identified and managed in practice is also increasingly reflected in recent guidance and regional discussions. Recent guidance, including the UN Working Group on Business and Human Rights' report on *Agribusiness, Food Security and Human Rights*,[7] highlights both the need to address these risks and the potential for more inclusive governance, stakeholder engagement and collaborative approaches to strengthen development outcomes. Similar analyses emerged during the EHABHR Dialogue, where participants highlighted examples of co-ownership models and more equitable benefit-sharing arrangements that can contribute to sustainable livelihoods, biodiversity protection and stronger community relations.

The growing recognition of governance, stakeholder engagement, transparency and HREDD as relevant to supplier resilience, investment quality, long-term performance and competitiveness points to a broader shift towards integrating RBC considerations into investment decision-making. **This shift is reflected, in part, in the growing influence of frameworks such as the IFC Performance Standards and the Equator Principles, as well as the environmental and social risk-management approaches adopted by development finance institutions.** These frameworks have contributed to greater attention to how environmental and human rights risks are identified, assessed, and managed in practice.

[6] Basimanyane, D. (2026). From Paris to the Niger Delta: Why human rights due diligence has a geography problem. Centre for Human Rights, University of Pretoria.
[7] United Nations Working Group on Business and Human Rights. (2023). Agribusiness, Food Security and Human Rights (A/HRC/62/36)

African Frameworks and Regional Developments

While international frameworks differ in their terminology, many are grounded in a common principle: meaningful stakeholder engagement requires more than consultation . Both the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the International Labour Organization's Indigenous and Tribal Peoples Convention (No. 169) recognise the importance of ensuring that affected peoples have a meaningful role in decisions affecting their lives, lands and livelihoods. Article 7 of ILO Convention No. 169, for example, affirms that Indigenous Peoples should have the right to determine their own development priorities, exercise control over their economic, social and cultural development to the greatest extent possible, and participate in the formulation, implementation and evaluation of development plans and programmes that directly affect them.[8]

This distinction is significant. The key issue is whether communities can influence decisions before they are finalised. **Too often, consultation takes place after key investment decisions have already been taken, reducing participation to the communication of predetermined outcomes.** Meaningful engagement therefore requires moving beyond consultation towards approaches that enable affected communities to actively shape decisions relating to their land, resources and development.

These discussions are also progressively reflected in regional developments. Since 2016, the African Union has been developing a Policy Framework on Business and Human Rights, a draft of which was validated by stakeholders in March 2017 but which has yet to be formally adopted. In March 2023, the African Commission on Human and Peoples' Rights adopted its Resolution on Business and Human Rights in Africa (ACHPR/Res.550 (LXXIV) 2023). Recalling the UNGPs, the resolution calls on the AU to finalise its Policy Framework, mandates the Commission's working groups to support States in closing implementation gaps through policy, legislative and regulatory reform, and tasks them with drafting an African regional legally binding instrument to regulate the activities of transnational corporations and other business enterprises, with a focus on accountability and access to remedy.[9]

While this regional instrument remains under development, these efforts reflect growing attempts to shape business and human rights governance through African institutions and experiences. They also suggest an increasing focus on how international standards can be interpreted and implemented in ways that respond to African development priorities, governance contexts and stakeholder expectations.

[8] Buhmann, K., Fonseca, A., Andrews, N., & Amatulli, G. (2024). Meaningful stakeholder engagement: The concept, practice and governance. In The Routledge Handbook on Meaningful Stakeholder Engagement (pp. 3-39). Routledge.
[9] Basimanyane, D. (2026). The United Nations Guiding Principles turn 15: It is time Africa held the pen. Centre for Human Rights, University of Pretoria.

To date, NAPs have been adopted in Ghana, Kenya, Liberia, Malawi, Nigeria and Uganda, while several other countries, including Ethiopia, Tanzania and Djibouti, are advancing consultations, baseline assessments and stakeholder engagement processes to inform future national approaches.[10]

Discussions during the EHABHR Dialogue also suggested that attention is increasingly shifting from the adoption of frameworks towards questions of implementation, monitoring and accountability. Experiences shared from Kenya, Uganda, Tanzania, Ethiopia and Djibouti illustrated growing efforts to operationalise NAPs through monitoring systems, stakeholder engagement processes, baseline assessments, grievance mechanisms and stronger collaboration between government, business and civil society actors. A comprehensive overview of the key outcomes of the discussions held during the EHABHR Dialogue is in the Conference Report.

These developments are taking place alongside broader continental initiatives such as Agenda 2063 and the African Continental Free Trade Area (AfCFTA), where discussions on industrialisation, investment, trade, value addition and private sector development intersect with questions of accountability, participation, sustainability and responsible investment. The Commission reinforced this link through its related resolution on a human rights-based approach to implementing and monitoring the AfCFTA (ACHPR/Res.551 (LXXIV) 2023). At the same time, regional discussions, including through the African Business and Human Rights Forum, are increasingly moving from policy commitments towards implementation. Recent dialogues have placed greater emphasis on remedy, accountability, responsible investment, meaningful stakeholder engagement and the practical application of HREDD particularly in the context of climate change, environmental sustainability and land-related impacts.

While differing in scope and maturity, these frameworks, provide important platforms for dialogue, institutional learning and regionally-led approaches to implementation. They also reflect a growing body of experience emerging from across the continent on how governments, businesses, CSOs, investors and rights-holders can navigate BHR challenges in diverse political, economic and social contexts. For businesses operating across African markets, these developments signal increasingly converging expectations around due diligence, accountability, stakeholder engagement and access to remedy.

Beyond Compliance: Perspectives from Business Practice

Questions about the implementation of RBC and BHR frameworks often look different from a business perspective. Rather than emerging through regulation alone, increasingly encounter environmental and human rights expectations through suppliers, customers, investors, financiers and markets.

[10] Office of the United Nations High Commissioner for Human Rights (OHCHR), National Action Plans on Business and Human Rights, accessed October 2026, https://www.ohchr.org/en/special-procedures/wg-business/national-action-plans-business-and-human-rights.

This resonates with broader trends and discussions highlighted during the private sector pre-dialogue convened by Global Compact Network Kenya, the Danish Embassy in Kenya, Danish Industry East Africa and DCA ahead of the EHABHR Dialogue. As it was emphasised, human rights and social sustainability are increasingly being understood not as parallel CSR tracks, but as part of the organising logic of how competitive and resilient businesses will be built in East Africa over the coming decade. From this perspective, due diligence is less about reporting and compliance, and more about governance, strategy, risk management, stakeholder engagement and long-term value creation. Participants highlighted how stronger approaches to due diligence, stakeholder engagement and supply chain transparency can help companies secure export markets, strengthen access to finance and build long-term commercial relationships.

For many businesses operating in regional and international value chains, expectations around traceability, responsible sourcing and risk management are increasingly becoming part of the conditions for doing business. **Whether responding to market demands, strengthening supplier relationships or building internal ownership, outcomes depend on how businesses translate commitments into decisions, incentives and everyday business practice.** Many of the participating companies subsequently contributed to the regional dialogue and workshop sessions, helping connect private sector perspectives with wider discussions on policy, accountability and implementation. Participants reflected that the pre-dialogue created a valuable space for peer learning, openness and trust-building across sectors. By bringing together stakeholders, the discussions helped strengthen mutual understanding, surface shared concerns and challenge assumptions that can otherwise limit collaboration across sectors on RBC.

During the private sector pre-dialogue, representatives from Kenya's manufacturing sector reflected on how investments in employee health and safety programmes, environmental controls and emissions management required significant upfront resources but contributed to fewer operational disruptions, stronger relationships with surrounding communities and a stronger social licence to operate. Rather than viewing these investments purely as compliance costs, participants described them as contributing to operational resilience and long-term business stability. Businesses from export-oriented sectors similarly highlighted how growing buyer and investor expectations are reshaping regional value chains, where businesses highlighted how customers, buyers and financiers increasingly request evidence of traceability, responsible sourcing and environmental and social risk management. It was noted that these expectations are becoming part of the practical requirements for maintaining commercial partnerships and accessing regional and international markets.

At the same time, businesses stressed that implementation must be grounded in local contexts. As new due diligence and compliance expectations emerge, increasing attention is being given to how these requirements can be adapted to relevant context and business capacities.

A published account from Uganda illustrates some of the practical demands involved. In March 2024, ITC reported that representatives from the coffee sector had raised concerns about the costs and time required to prepare for EUDR compliance, particularly the mapping of coffee farms. This experience highlights the importance of connecting expectations with the resources, information and coordination needed to respond. It illustrates a recurring theme that emerged throughout the dialogue: **rather than simply cascading requirements down value chains, practical tools, training and peer-learning opportunities are needed to help local businesses build the capabilities required to respond effectively.**[11]

A final recurring theme throughout the discussions in Nairobi was that RBC should be viewed and approached within the context of Africa's broader economic transformation, including industrialisation, regional trade, value addition, job creation and investment. Participants highlighted the important role of business associations, financial institutions, governments, CSOs and development partners in supporting implementation and capacity building and, as part of building resilient, and competitive businesses capable of contributing to sustainable economic growth.

[11] International Trade Centre. (2024, March 14). Advancing responsible business conduct in Uganda.

3 Regional Progress and Broadening Participation

As discussions move from commitment to action – beyond compliance - participation becomes relevant not only as a principle, but as a practical component of how implementation happens. As emphasised above, international frameworks consistently emphasise stakeholder engagement as a core element of RBC and HREDD. Yet the experiences presented throughout this report drawing from the below cases suggest that participation is often less a procedural requirement but more a question of how organisations gain access to information about risks, impacts and context.

Dialogue as Enabler of Implementation

Business associations, NHRIs, faith actors, youth networks, media organisations, civil society and regional dialogue platforms increasingly form part of a wider implementation ecosystem through which organisations interpret expectations, exchange experience and respond to practical challenges. The **UNDP case** reflects how regional and sub-regional dialogue processes create opportunities for governments, businesses, NHRIs, CSOs and development actors to compare experiences, discuss implementation challenges and learn from approaches emerging across different African contexts. The **UNDP case** also suggests that implementation is strengthened not only through policies and institutions, but through opportunities for peer learning, exchange and adaptation across different national contexts. Regional dialogue processes therefore function not only as convening spaces, but increasingly as **part of a broader implementation ecosystem through which lessons, approaches and emerging practices circulate across sectors, countries and regions.** Through its engagement in BHR dialogue processes, including support to regional learning and exchange, UNDP and co-convenors including OHCHR, UNICEF, the UN Global Compact Network, the African Union, and African Commission on Human and Peoples' Rights (ACHPR) contributes to creating spaces where practical experiences can move across countries, sectors and stakeholder groups.[12] The EHABHR Dialogue forms part of this broader ecosystem, enabling lessons from the sub-region to inform wider African discussions while also drawing on experiences emerging elsewhere across the continent.

A related perspective emerges through the **IMPACT case**, which reflects on dialogue and mediation processes involving Indigenous communities, investors and public institutions to address tensions related to large-scale land-based renewable energy projects in Kenya.

[12] African Business and Human Rights Forum. (2026). Concept Note: Realising the Right to a Clean, Healthy and Sustainable Environment through Responsible Business Conduct; Network of African National Human Rights Institutions (NANHRI) and United Nations Development Programme (UNDP). (2024). Dialogue on Synergies Between the UN Guiding Principles on Business and Human Rights and the African Continental Free Trade Area.

The case explores how targeted engagement and dialogue between indigenous communities, investors and the national human rights commission helped address competing interests, clarify expectations and create opportunities for resolving tensions before disagreements become more entrenched disputes. The experiences highlighted illustrate how dialogue can act as an enabler of implementation by creating spaces for learning, trust-building, problem-solving and engagement among stakeholders with different interests, responsibilities and perspectives.

Participation, Inclusion and Community Voices

Stakeholder engagement influences how organisations understand risks, identify potential impacts and navigate competing interests in practice. Across several cases, questions of participation emerge through discussions about information, representation and decision-making.

The **Witness Radio case** raises these issues in relation to land acquisition and investment processes, highlighting how access to information influences whether affected communities can engage with decisions before concerns develop into grievances. It illustrates how power imbalances, inaccessible information, weak grievance systems and limited awareness of available remedy mechanisms can exclude communities from processes that affect their rights and livelihoods. The case underscores the importance of ensuring that communities are informed, empowered and able to effectively participate in decision-making and seek redress when harms occur. On a broader level, the **PAYA-BHR case** explores how access to information, leadership opportunities and the role of young people in shaping future labour markets, entrepreneurship ecosystems and investment priorities. Rather than viewing young people solely as future stakeholders, the case highlights that they are already workers, entrepreneurs, consumers and rights holders whose lives are shaped by decisions being taken today. Participation is key on several levels, including in BHR policy fora and across governance processes beyond tick-box consultations. Access to information, mentorship, cross-sectoral networks can be some of the levers to reach businesses and relevant public institutions. These cases invite reflection on a common implementation challenge. **Participation is not simply about being present in a process. It concerns whether affected stakeholders are able to influence how risks are identified, how priorities are set and how decisions are made.**

Accountability, Remedy and Trust

While international frameworks increasingly emphasise access to remedy, the experiences presented in this report suggest that accountability is rarely experienced through formal mechanisms alone. Rather, questions of accountability often emerge at the intersection of information, trust, representation and access.

A recurring message throughout the EHABHR Dialogue was that access to remedy begins long before a grievance is filed. Across sectors and contexts, participants emphasised that effective remedy depends on timely information sharing, meaningful stakeholder engagement, ongoing dialogue and trusted relationships. Examples from the dialogue highlighted the importance of pre-consultation processes, joint ownership approaches and continuous feedback loops with affected communities throughout the investment lifecycle. **In practice, remedy was often strongest where potentially affected rights-holders were engaged early, concerns could be raised through accessible and trusted channels, and organisations worked closely with intermediaries such as CSOs, NHRIs and HREDs.** Participants repeatedly noted that these approaches not only strengthen access to remedy but also improve risk identification, help prevent harm and reduce the likelihood that disputes escalate into more serious conflicts.

The **Witness Radio case** approaches these issues through land-related grievances and investment processes, highlighting how access to information can shape whether affected stakeholders are able to raise concerns, engage with decision-making processes or pursue remedy when harms occur. The examples provided from land-based investments in Uganda underline how monitoring, awareness raising and support through mediation can support early risk identification which can benefit both rights-holders and duty bearers. A related perspective emerges through the **Cultivating Justice Partnership case**, which explores land and labor rights, environmental justice and grievance handling in the Kenyan agribusiness sector. Engagement with justice actors and community structures is helping to build greater understanding of the relationship between formal and community-based mechanisms, while also highlighting the need to ensure that such pathways are rights-based, accessible and responsive to affected communities. For instance, the **Cultivating Justice Partnership case** demonstrates how Alternative Justice Systems (AJS) provide an important entry point for communities to navigate business-related impacts. The **IMPACT case** also showcases how a co-designed a Community-Led Grievance Redress Mechanism (CGRM) with affected communities combined formal procedural safeguards with existing community dispute-resolution structures, provides a predictable and accessible non-judicial remedy mechanism jointly overseen by communities, the company and local authorities. The **FECCLAHA, Swedwatch and Act Church of Sweden case** approaches similar challenges through community-driven remedy and the role of faith actors as trusted intermediaries. Their experiences come from many years of identifying and reaction to risks and violations in extractive industries.

This and the above cases highlight how individuals often turn first to institutions and relationships they know and trust, particularly where formal mechanisms appear distant, unfamiliar or difficult to navigate. Seen from different angles, these cases invite reflection towards the challenge that accountability systems may exist, but their effectiveness often depends on whether affected stakeholders are aware of them, trust them, and believe they can lead to meaningful outcomes.

Implementation in Conflict-Affected and High-Risk Contexts

Across East and Horn of Africa, stakeholders are increasingly seeking to translate RBC commitments into practice in contexts shaped by diverse social, political and economic realities. The following draws on dialogue and practitioner experiences to examine participation, accountability, remedy and implementation challenges in conflict-affected and high-risk contexts.

From the context of Somalia, the **AMARD case** highlights how minority communities and internally displaced populations continue to face barriers to land ownership, legal protection, education, employment and financial inclusion. During the EHABHR Dialogue, a representative from the South Sudan Human Rights Defenders Network highlighted how poorly designed investments can generate impacts that extend well beyond a project's immediate footprint. Inadequate consultation and engagement processes can exclude affected stakeholders from decision-making and reinforce existing grievances. In contexts already affected by fragility or conflict, such shortcomings can increase tensions, weaken social cohesion and contribute to further instability. **Large-scale land-based investments may lead to displacement or evictions where FPIC is not secured, while infrastructure and extractive projects can intensify competition over land and natural resources.** The consequences for communities can include loss of livelihoods, food insecurity, increased poverty, environmental degradation, health impacts and social disruption.

The examples highlight the importance of understanding contexts, engaging potentially affected stakeholders in advance and ensuring that those most at risk are not overlooked. As growing practice on heightened approaches to HREDD increasingly recognises, the challenge is often less about applying different principles than about implementing existing expectations effectively in complex environments.

4 From Risk Management to Shared Value Creation

Due diligence increasingly appears in conversations about governance, competitiveness, investment quality, supplier relationships and organisational resilience. Discussions on risk management often evolve into broader conversations about responding to changing expectations in complex operating environments.

Businesses encounter expectations through customers, suppliers and investors. Communities, workers, and consumers experience the impacts of regulation, investment decisions, land-use changes and labour market dynamics. Governments and public institutions seek to create enabling conditions for responsible investment and sustainable development. Below, it will be unfolded how managing risks consciously and comprehensively can create value both for rights-holders and private sector and public institutions.

Competitiveness, Markets and Evolving Expectations

Many businesses in East and Horn of Africa increasingly encounter RBC through commercial relationships and market expectations rather than regulation alone. As discussed above, sustainability and due diligence are increasingly being viewed not primarily as reporting or compliance exercises, but as matters of governance, business strategy, resilience and long-term value creation.[13]

The **EHPEA case**, **GCNK case** and **GIZ case** illustrate how these developments are approached in practice. Rather than approaching due diligence as a stand-alone regulatory requirement, they raise questions about how businesses respond to changing expectations while remaining competitive, maintaining market access and managing operational realities. The **EHPEA case** reflects how growers and exporters increasingly navigate labour standards, environmental requirements, buyer expectations and access to international markets simultaneously. The horticulture sector, where women make up 80% of Ethiopia's workforce, is exposed to a range of gender-related labour risks, including discrimination, unequal pay, harassment, and barriers to representation and advancement. The exporters association has therefore promoted sector tailored initiatives, such as workplace gender committees focusing on equality, prevention of gender-based violence, sexual and reproductive health rights, grievance mechanism, hygiene, nutrition and leadership. The **GCNK case** approaches similar issues through governance systems, supplier engagement and the integration of due diligence into business operations through their Accelerator initiative.

[13] Rasche, A. (2026). Sustainability Is a Strategic Priority, Not a Reporting Exercise. Interview with osapiens; Organisation for Economic Co-operation and Development (OECD). (2023). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Paris: OECD Publishing.

Here, companies are supported in evaluating existing systems, mapping value chains, identifying and prioritising salient human rights impacts, developing action plans, engaging stakeholders, and strengthening processes for grievances and remedy. Through the Due Diligence Navigator, the **GIZ case** highlights the practical challenge of moving from commitments, audits and policies towards risk prioritisation, resource allocation and action. As a 'Team Europe Initiative' it creates an overview of relevant activities to support coordination and avoid duplication, also to support businesses, governments and civil society stakeholders in partner countries to identify guidance and support to navigate the due diligence expectations coming from new EU regulations.

Governance, stakeholder engagement, transparency and HREDD are increasingly discussed alongside questions of supplier resilience, investment quality, long-term performance and competitiveness. Dialogue participants also highlighted the importance of supporting suppliers and MSMEs to navigate emerging expectations through business associations, peer-learning networks and practical implementation tools. This reflects the broader trend in which expectations on RBC are increasingly reinforced through both market and financial relationships.

Across the cases, RBC increasingly appears not as a stand-alone sustainability agenda, but as part of broader efforts to strengthen competitiveness, supplier resilience, investment readiness and long-term business performance. While organisations may initially engage with RBC in response to regulatory, buyer or investor expectations, implementation often creates value beyond compliance. **Stronger governance systems, improved stakeholder relationships, better risk management and increased transparency can help businesses anticipate challenges, reduce disruptions and build more resilient value chains.** The cases also suggest that implementation outcomes are shaped not only by the actions of individual companies, but by the wider ecosystems in which they operate. Business associations, financial institutions, public authorities, civil society organisations and development partners all influence whether businesses have access to the knowledge, incentives, relationships and support required to translate commitments into practice. Strengthening RBC therefore also involves strengthening the systems and institutions that enable implementation.

Partnerships, Investment and Shared Value

Questions about value creation become particularly visible when implementation challenges extend beyond the capabilities of any single actor. Across the cases presented in this chapter, partnerships emerge as an important mechanism for addressing complex social, environmental and economic challenges that cut across organisational, sectoral and institutional boundaries. Through collaboration, stakeholders can combine resources, expertise and perspectives in ways that support more effective and sustainable approaches to implementation.

This is reflected in the **Cultivating Justice Partnership case**, where businesses, communities and civil society actors engage with interconnected questions of land rights, environmental sustainability and economic development, e.g. through focused dialogue sessions. The **AMARD case** also highlights how strong partnerships are essential to strengthen livelihoods, entrepreneurship and economic inclusion, addressing the complex barriers facing vulnerable populations, as different institutions possess different mandates and expertise. Partnerships can create spaces for dialogue, learning and collective problem-solving, helping stakeholders navigate competing priorities and identify pathways forward. The **UNDP case** further highlights how collaborative partnerships can translate into greater ownership. The Africa Business and Human Rights Forum has evolved through co-creation among CSOs, Indigenous Peoples, human rights defenders, faith-based organisations and other stakeholders, helping establish a shared African platform for dialogue and learning on BHR.

While these experiences arise from different contexts, they point to a common lesson: many of the challenges associated with RBC cannot be addressed by individual organisations acting alone. As expectations from buyers, investors, financiers and rights holders continue to evolve, collaboration increasingly becomes a practical means of addressing risks, strengthening trust and supporting responsible investment.

Across the cases, partnerships were not presented as an end in themselves, but as practical mechanisms for addressing implementation challenges that no single actor can solve alone. The experiences presented also suggest that implementation outcomes are shaped not only by the actions of individual companies, but by the wider ecosystems in which they operate. Business associations, financial institutions, public authorities, civil society and development partners all influence whether businesses have access to the knowledge, incentives, relationships and support required to translate commitments into practice.

Strengthening RBC therefore also involves strengthening the systems and institutions that enable implementation, as this is often strongest when actors combine complementary resources, knowledge, relationships and mandates around shared objectives. Viewed collectively, these experiences suggest that partnerships are not only vehicles for project delivery. They can also function as implementation platforms that help align incentives, mobilise resources, strengthen accountability and connect local needs with broader policy, investment and market processes.

5 Conclusion & Recommendations

Fifteen years after the adoption of the UNGPs and OECD Guidelines, awareness of RBC has grown significantly across East and Horn of Africa. Across the region and as reflected in global trends, governments are reviewing and strengthening NAPs, businesses are responding to evolving market, investor and regulatory expectations, and CSOs, NHRIs and community actors are developing new approaches to accountability, participation and remedy.

The experiences presented in this report demonstrate that translating commitments into practice is rarely a technical exercise. It is a process shaped by relationships, trust, context, institutional capacity and the ability of different actors to work together around shared challenges. The findings underscore the importance of applying a risk-based approach that prioritises the most severe actual and potential impacts on people and the environment. **Due diligence should be responsive to the operating context and sector-specific risks, with heightened human rights due diligence undertaken in situations where there is a greater likelihood of severe impacts, including conflict-affected areas and other high-risk contexts.** Another lesson is that implementation is strongest when those most affected by business activities are meaningfully involved. Across sectors and contexts, it is repeatedly highlighted that effective stakeholder engagement improves understanding of risks, strengthens decision-making and contributes to more sustainable outcomes. Rights-holders are essential contributors to identifying risks, strengthening accountability and shaping viable solutions.

The report also highlights the central role of accountability and remedy. While policies, standards and grievance mechanisms are important, their effectiveness ultimately depends on whether affected stakeholders are aware of them, trust them and can access them in practice. Across many of the experiences presented, access to remedy begins long before a formal complaint is filed. Information, dialogue, mediation, community engagement and trusted institutions often proved just as important as formal procedures in preventing harms and resolving disputes.

Fortunately, RBC is increasingly being viewed not only as a compliance requirement, but as part of how competitive, resilient and investment-ready businesses are built. Participants highlighted how approaches to due diligence, stakeholder engagement, responsible sourcing and risk management are becoming increasingly relevant to market access, investor confidence, supply-chain relationships and long-term business performance. For many businesses operating in regional and international markets, RBC is becoming part of the commercial infrastructure required to compete and grow.

Finally, the report illustrates that many of the challenges associated with RBC cannot be addressed by individual actors working alone. Governments, businesses, NHRIs, CSOs, faith actors, business associations, investors and development partners each have distinct roles to play. The experiences presented throughout this report suggest that implementation is often most effective where these actors collaborate, share knowledge and combine their respective strengths to address complex social, environmental and economic challenges.

These experiences presented offers an important reminder that RBC is not an end in itself. It is a means of supporting more accountable investments, more resilient communities, more inclusive markets and more sustainable development outcomes. Moving beyond compliance therefore requires more than policies and commitments. It requires practical action, continuous learning, meaningful participation and partnerships capable of translating principles into lasting change. These reflection and analysis have informed the below recommendations

Recommendations

1 Make Rights-Holder Engagement a Requirement, Not an Afterthought

Engagement with affected stakeholders influence more than participation alone. It often affects the quality of risk identification, decision-making and implementation. Rights-holders often possess information about emerging risks, implementation barriers and unintended impacts that may not be visible through audits, reporting systems or formal assessments alone. Businesses, investors and public authorities should therefore ensure that affected stakeholders are engaged early and throughout the investment and implementation cycle. Experiences shared during the Dialogue consistently demonstrated that early engagement improves risk identification, helps prevent disputes, strengthens project legitimacy and contributes to more effective implementation outcomes. This includes:

- Demonstrating how stakeholder input has informed decisions
- Ensuring participation of women, workers, youth, Indigenous Peoples, minority groups, smallholders and affected communities
- Allocating sufficient resources to engagement, feedback and follow-up
- Recognizing rights-holder engagement as a source of operational insight, risk identification and problem-solving rather than a compliance requirement alone.

2 Prioritise Due Diligence Where Risks Are Highest

Implementation requires prioritisation. Businesses, investors and policymakers should apply risk-based approaches that focus attention and resources on the most severe actual or potential impacts on people and the environment.
Particular attention should be given to:

- Land-based investments and related value chains, including agribusiness, food systems, renewable energy, extractives, and supporting infrastructure
- Conflict-affected and high-risk environments
- Contexts characterised by displacement, weak governance or environmental vulnerability

The experiences discussed suggest that standard approaches may be insufficient in contexts characterised by conflict, exclusion, displacement or heightened vulnerabilities. The challenge is not only identifying where risks exist, but ensuring that attention and resources are directed towards those most likely to experience adverse impacts. This is particularly relevant in contexts characterised by large-scale land-based investments, conflict, displacement or weak governance, where failures in due diligence can have long-term consequences for both rights-holders and investors.

3 Invest in Mutual Capacity, Accountability and Access to Remedy

Many of the implementation challenges are ultimately experienced locally and highlights the importance of institutions, relationships and actors operating close to affected communities. Implementation therefore depends not only on standards and policies, but also on the strength of the local institutions, relationships and accountability ecosystems responsible for translating commitments into practice. Particular attention should be given to:

- National Human Rights Institutions
- Business associations and sector platforms supporting implementation among MSMEs
- Trade unions
- Community-based organisations, civil society and faith actors
- Human rights and environmental defenders
- Locally trusted accountability and remedy mechanisms

Effective implementation often depends on the availability of resources, capable institutions and opportunities for continued learning and coordination. Whether through NAPs processes, grievance mechanisms, business networks, community-based organisations or regional dialogue platforms, implementation requires sustained attention if commitments are to be translated into practice.

4 Treat Responsible Business Conduct as a Core Business and Investment Function

RBC increasingly intersects with governance, competitiveness, supplier relationships, investment decisions and resilience. Environmental and human rights due diligence should therefore be integrated into governance structures, investment decisions and operational processes rather than treated as a stand-alone sustainability or compliance function. Businesses and investors should consider:

- Integrating HREDD into procurement and sourcing decisions
- Using due diligence findings to inform investment and market-entry decisions
- Strengthening board and management oversight of environmental and human rights risks
- Linking due diligence outcomes to risk management, business planning and performance monitoring
- Building internal capacity to continuously identify, assess and respond to emerging risks and opportunities
- Supporting suppliers and MSMEs to build capacity for due diligence and responsible business conduct

Organisations increasingly encounter due diligence through customer expectations, investor requirements, supplier relationships and market access considerations. Viewing RBC as a strategic governance and business function may therefore help strengthen implementation, market access, investor confidence and long-term resilience.

5 Invest in Collaborative Approaches to Address Shared Implementation Challenges

Questions related to land governance, accountability, investment, stakeholder engagement, supply-chain governance and remedy frequently extend beyond the mandate of any single organisation, institution or sector. Collaboration is often not simply desirable, but necessary. Collaboration creates opportunities not because actors share identical interests, but because they often confront similar implementation questions from different starting points. Experiences presented throughout the report suggest that many implementation challenges are less constrained by a lack of standards than by a lack of coordination, trust and shared problem-solving capacity across stakeholder groups.

Businesses, governments, investors and development partners should continue investing in:

- Multi-stakeholder dialogue platforms
- Sector-wide initiatives and peer-learning mechanisms
- Regional and national implementation platforms connecting policy, practice and accountability actors
- Collective action approaches
- Partnerships connecting businesses, rights holders, public institutions and civil society organisations

6 Link Responsible Business Conduct to Economic Transformation and Responsible Investment

As highlighted throughout the Dialogue, responsible business conduct should not be viewed solely as a mechanism for reducing harm. It should also be recognised as part of how more competitive, resilient and investment-ready economies are built. Investments in food systems, climate adaptation, renewable energy, infrastructure, manufacturing and regional trade are creating opportunities for growth, entrepreneurship and employment.
Businesses, investors and policymakers should therefore also seek to integrate RBC and HREDD into broader discussions on:

- Responsible investment
- Blended finance and development finance initiatives
- Climate finance
- Industrialisation and economic development
- Regional value-chain development
- Employment creation

RBC is increasingly linked to questions of investment quality, long-term resilience, governance and market access. Responsible investment should therefore not be viewed as separate from economic transformation, but as part of how more inclusive, resilient, competitive and accountable economies are built. As climate-related and development-oriented investments continue to expand across the region, integrating environmental and human rights considerations from the outset will be critical to ensuring that economic transformation is both inclusive and sustainable.

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CASES

The African Business and Human Rights Forum at 5 Shaping Business and Human Rights and Responsible Business Conduct in Africa

By The United Nations Development Programme (UNDP)

Since 2022, the African Business and Human Rights Forum (ABHRF) have continued to position itself as the continental platform for convening, dialogue, exchange, deliberation, discussion, and networking to shape Business and Human Rights (BHR) in Africa. Over the past four years, the Forum has grown and evolved into Africa's multi-stakeholder platform for BHR and Responsible Business Conduct (RBC).

The significant growth of the Forum between 2022 and 2025 not only reflects increased stakeholder engagement and commitment to the subject across the continent but also highlights key milestones achieved in advancing BHR policies and practices. Across the world, similar Dialogues and Forums on BHR are happening at different levels and among diverse stakeholders. For example, the annual Global BHR Forum in Geneva, the Responsible Business and Human Rights Forum in Asia, the East African Dialogue on BHR and, more recently, the Arab States Dialogue on BHR.

While the levels, depths and scope of these conversations may vary across the world, these platforms, which also serve as advocacy spaces, underscore the importance of the United Nations Guiding Principles on BHR (UNGPs) and other international standards.
As we approach the 5th ABHRF, it is imperative that we reflect on how far we have come and what we have achieved through the Forum.

Establishing a platform for continental discourse

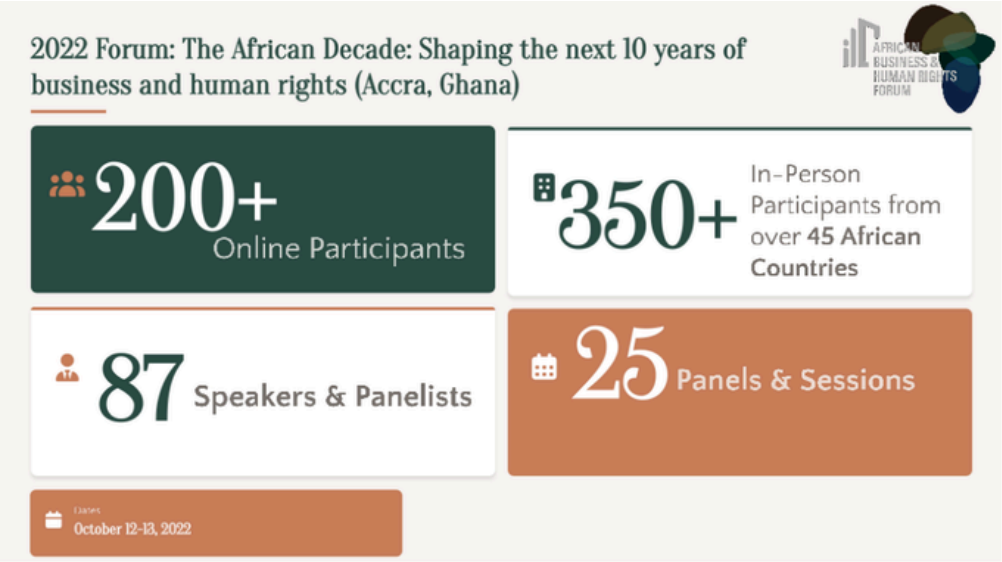
Every year, the team of Forum co-organisers (UNDP, OHCHR, UNICEF, UN Global Compact, UN Working Group on Business and Human Rights, African Union Commission (AUC), African Commission on Human and Peoples' Rights (ACHPR) have always been intentional about the theme of the Forum and its implications on the broader BHR discourse in Africa.

Therefore, the intentionality applied towards the selection of the theme and scope of the BHR Forums has been a strategic move to ensure that each Forum builds on the success and theme of the previous one. For example, the Forum's foundation was laid in Accra with an evaluation of the last decade of the UNGPs. At the same time, the Forum in Addis Ababa discussed anchoring the Forum in policy action, with an emphasis on Africa for Africa. This led us to Nairobi, where the Nairobi Declaration was developed as a call to action, and, more recently, to the 2025 Forum in Lusaka, which drew on the AU's theme of the year on remedy and reparations, with an emphasis on translating commitments made in Nairobi into action. A working group and framework will be developed to implement the commitments made through the Nairobi Declaration.

ABHRF at 5, From Commitments to Action

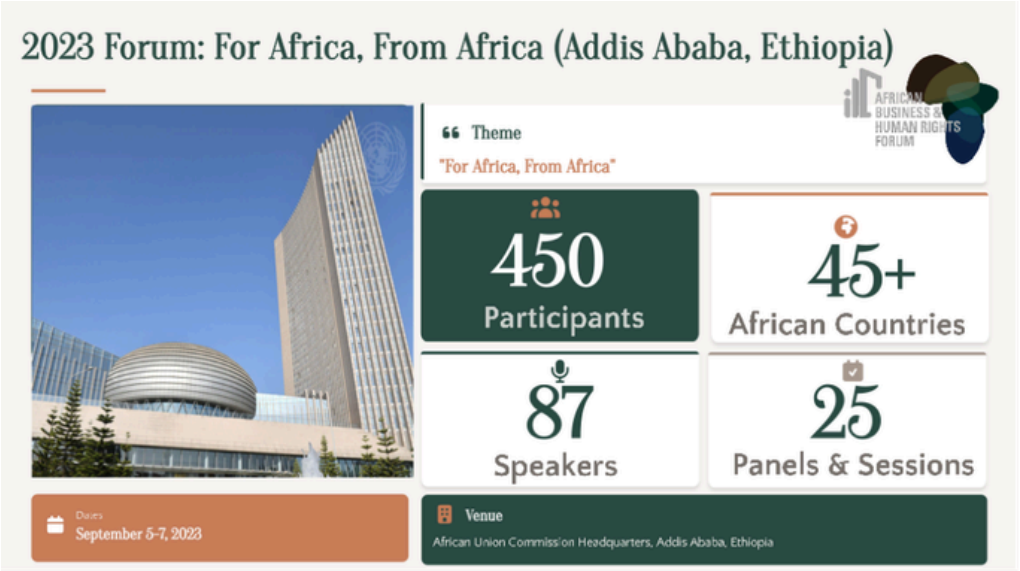
The ABHRF has been organised across three sub-regions of Africa (West, East and Southern Africa). This practice of hosting the Forum in different countries and sub-regions every year is one that the strategies that the ABHRF successfully pioneered and implemented to increase national ownership on BHR and also during the Forum, leverage it as a strategic advocacy platform to catalyse national action and commitments towards NAP development processes, increase engagement with CSOs, private sector and other key national stakeholders, and take into account the language, cultural, and regional nomenclatures of the African continent. In fact, in countries where the BHR Forum has been hosted, we have seen not only increased awareness of BHR but also greater uptake of developing National Action Plans (NAPs) on BHR and mainstreaming RBC.

The first ABHRF, which was held in Accra, Ghana, in 2022 under the theme "The African Decade: Shaping the next 10 years of business and human rights", marked a monumental step in establishing the continental platform for African conversations and strategically positioning African engagement on BHR. The Forum brought together 350 delegates, including representatives from 45 African countries and 15 partners, for three days of deliberations and engagement to take stock of the first decade of the UNGPs. As the inaugural Forum, it was also an opportunity to create awareness on the UNGPs and deepen the understanding of delegates on BHR, evaluate ongoing national efforts towards the development of NAPs on BHR, promote Human Rights Due Diligence and show the linkages between the BHR agenda and the trade and value chains under the African Continental Free Trade Area (AfCFTA).



Organised at a critical time when the world was grappling with the effects of COVID-19 on its economies, the Forum showed that human rights issues cannot wait nor be swept aside in a global pandemic. It was also a critical time for BHR, as the UNGPs had just completed the first decade; it was an opportunity to reflect on the progress made over the first 10 years. In commemoration of this milestone, UNDP undertook the study "***A Baseline Assessment on Business and Human Rights in Africa: From the First Decade to the Next***" to assess the progress made on BHR in Africa.

In 2023, it became important to situate the Forum within the African context and specifically within the African Union. The AU designated 2023 as the year for "Acceleration of African Continental Free Traden Area (AfCFTA) Implementation" with the goal of accelerating the operationalisation of the AfCFTA to boost intra-African trade, enhance economic integration, and promote sustainable socio-economic development across the continent.

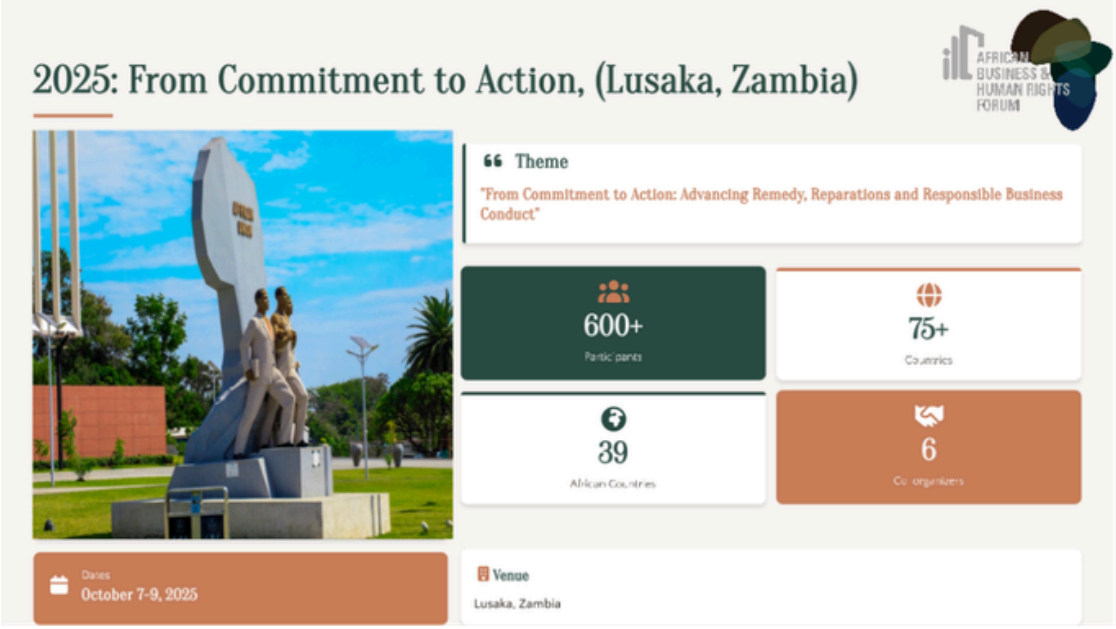


The Forum was organised at the African Union Headquarters in Addis Ababa, Ethiopia, with over 450 delegates, under the theme “For Africa, From Africa” with the goal of focusing on home-grown and Africa-centred solutions. The sessions of the Forum also explored new themes, including the rights of the child in the supply chain, the nexus between BHR and labour and migration, the interconnectedness of trade, regulations, and supply chains with conflicts, and the role of rights-holders in ensuring accountability.

By 2024, we began to witness a shift in the development space, driven by the super-election year and a reprioritisation of government policies from development to security and defence. This refocus and reprioritisation led governments to place more emphasis on trade as the basis for development financing and Official Development Assistance (ODA). In line with these trends, the theme of the 2024 Forum centred on “Promoting Responsible Business Conduct in a Rapidly Changing Context” with the goal of addressing these changes and assessing their implications for the BHR agenda globally and specifically in Africa. The Forum brought together over 500 delegates and 100 speakers across 35 panels in Nairobi, Kenya. It also led to the development and endorsement of the Nairobi Declaration as a shared commitment by all stakeholders.



By the 4th iteration, held in Lusaka, Zambia, in 2025, the Forum made a strategic shift to move beyond expanding the conversation on BHR to delivering key strategic actions on BHR in Africa. Under the theme 2025 “From Commitment to Action: Advancing Remedy, Reparations and Responsible Business Conduct in Africa”. Over 620 delegates were in attendance, and the theme also aligned perfectly with the AU's 2025 theme, “Justice for Africans and People of African Descent through reparations”. An integral part of the 2025 Forum was the opportunity to evaluate the Nairobi declaration.



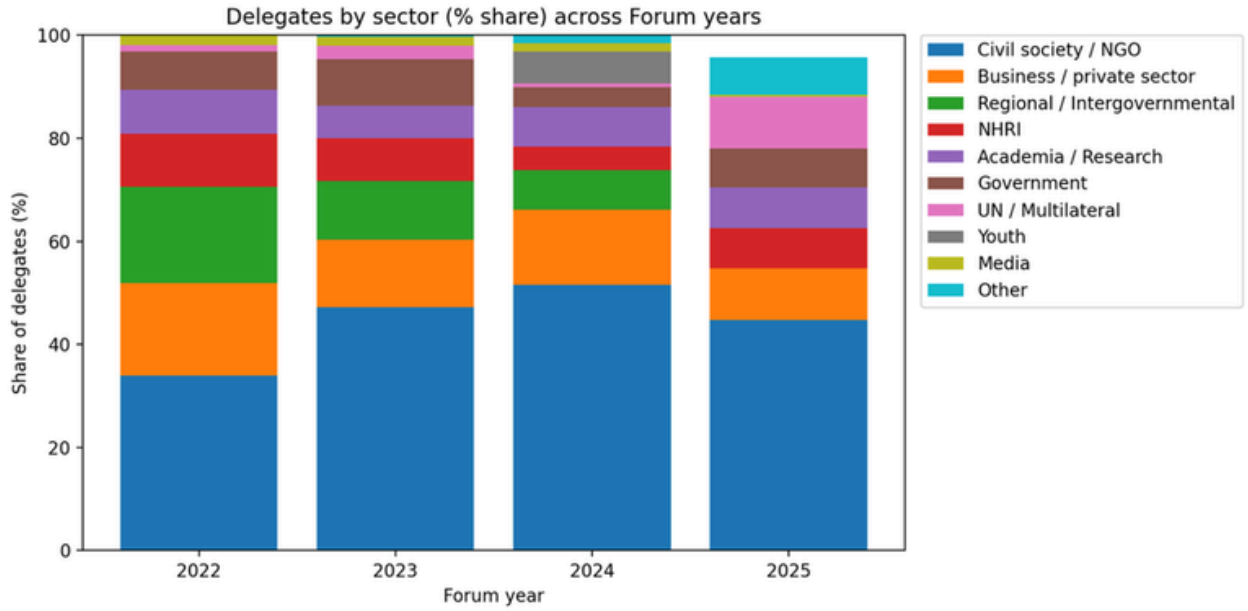
The success of the past four years underscores the Forum's contributions to shaping the BHR agenda in Africa, including the adoption of NAPs. Since 2022, we have seen the development of three additional NAPs in Africa (Nigeria, Liberia, and Ghana), bringing the total to 5 (including Kenya and Uganda). These NAPs provide a roadmap for integrating the UNGPs into national policies and practices, thereby advancing the BHR agenda at the local level. Consequently, the decision to host the Forum across different countries validates this progress, as countries that have hosted or even participated in the Forum have seen an expedited commitment to the development of their NAP.

Leveraging the power of strategic multi-stakeholder partnerships

The success of the ABHRF has been largely due to strategic partnerships, engagement and collaboration with key stakeholders such as governments, the AU, the United Nations (UN), civil society, academia, the private sector, National Human Rights Institutions (NHRIs), law firms, trade unions, labour unions, etc.



With this, over 2000 delegates and participants have attended the Forum (350 participants in Accra in 2022, 450 in Addis Ababa in 2023, over 510 in Nairobi in 2024 and 620 in Lusaka in 2025), reflecting how the Forum has evolved into a dynamic and vibrant regional space for dialogue and awareness-raising on the UNGPs.



Also key to this success is the UN-AU partnership, which is guided by the UN-AU collaboration framework, including the AU-UN framework on human rights. The co-organisers, who have led the charge in organising the Forum over the last four years, have not only leveraged the frameworks and mandates of each institution.
At the centre of this growth, progress, success and momentum from Accra to Lusaka in the span of 4 years is the investment in strategic partnerships, advocacy, regional leadership, multi-stakeholder engagement, inter-agency collaboration and coordination and the support of over 80 other partners which cut across Civil Society Organisations (CSOs), Faith-Based Organisations (FBOs), Law Firms, has proven to be a successful partnership model for the BHR Forum.

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Action Aid International, Advocates for Community Alternatives, Advocates for International Development (A4ID), African Coalition for Corporate Accountability and Business (ACCA), African Commission on Human and Peoples' Rights (ACHPR-Banjul Commission), African Resources Watch, AfDB/IRM, Alliance for Land, Indigenous, and Environmental Defenders, APRM, Arche Advisors, Association Paysanne des Jeunes Entrepreneurs Agricole, AVOCATS SANS FRONTIERES, Belgian Agency for International Cooperation - Enabel - Uganda, Business & Human Rights Resource Centre, Centre for Applied Legal Studies (CALS), Centre for Child Rights, Centre for Democracy and Human Rights, Centre for Environment Justice, Christian Aid, Church of Sweden, The Circulate Initiative, DanChurchAid, Danish Family Planning Association, Danish Institute for Human Rights (DIHR), ELS-TOGO, Ethical trading initiative, Federation of African Law Students (FALAS), Fellowship of Christian Councils and Churches in the Great Lakes and Horn of Africa, Foreign Commonwealth and Development Office (FCDO), Friedrich-Ebert-Stiftung (FES), FRIEDRICH-EBERT-STIFTUNG AU COOPERATION OFFICE (FES AU), Fundación Avina, GBI, GIZ-AU, Global Compact Network Kenya, Global Rights Compliance, HakiRasilimali, ICoCA - The Responsible Security Association, ILO, Indigenous People's meeting, International Alert, International Federation for Human Rights, International Organisation of Employers (IOE), International Organization for Migration (IOM), IPIS, ITUC, KAS, Lawyers for Human Rights, Leigh Day, Mbuyisa Moleele, Lusophone Platform on Human Rights, MALAWI MISSION TO THE UN IN GENEVA, Network of African National Human Rights Institutions (NANHRI), Norwegian Church Aid, OECD, OECD Watch, OXFAM, Pan African Lawyers Union (PALU), Partner Africa, RAID, Rafto, ACT Alliance partners, Norwegian Church Aid, Rosa Luxenberg Southern Africa, RTDS, RWI, Thomson Reuters Foundation (TRF)/TrustLaw, Ubuntu Development Network (UDM), United Nations Global Compact (UNGC), United Nations Global Compact Network Kenya (UNGCNK), UN Voluntary Fund for Indigenous Peoples, Voluntary Principles, Webber Wentzel (South Africa), Zimbabwe Council of Churches, and the Zimbabwe Environmental Law Association (ZELA) with the UN Global Compact, International Organisation of Employers (IOE), Network of African National Human Rights Institutions (NANHRI),

These partners have helped sustain and strengthen not only the regional discourse on BHR but also engagement with national stakeholders and the development of NAPs, and, overall, turn commitments into action.

Looking ahead: What have we learned after 5 years

- ***Collaborative partnership translates into Ownership:*** The success of the ABHRF has been driven by partners' collaboration and co-creation. The Forum has become an African space and voice for CSOs, indigenous communities, human rights defenders, faith-based organisations, law firms, to contribute to the broad discourse on BHR

- ***Regional Balance and Inclusion promote awareness and advocacy:*** The strategy of hosting the Forum across the continent has promoted regional ownership, inclusivity, and advancements in the Forum. Expanding the Forum to North and Central Africa and fostering subregional dialogues will further strengthen stakeholder engagement and regional cooperation. In addition, the Arab-Africa dialogue served as a good opportunity to further create synergy between the African and Arab experiences on business and human rights

- ***Autonomy and Alignment:*** For the Forum to remain a space of safety and neutrality, and an environment where stakeholders can freely engage in important discussions, we must maintain the Forum's independence and neutrality as we engage with host governments.

- ***Sustaining Momentum:*** The ABHRF's progress has shown that it is important to sustain the momentum behind the Forum. This momentum can be sustained through continued engagement with host governments, technical support, and peer-to-peer learning among governments. We will continue to encourage governments that indicate an interest in hosting the Forum and show commitment towards the localisation of the UNGPs, including through a contextualised and participatory NAP process.

- ***Innovative Financing:*** So far, the Forum has been funded with resources pooled from the co-organisers and partners. Despite the Forum co-organisers' limited resources, the Forum has been a success because partners have committed additional funding to cover various costs related to the Forum. While this model continues to work, the co-organisers' investments are important, as the Forum is a major deliverable with the potential to yield transformational results and engage the donor community, whose investments will further ensure sustained impact, scalability, and sustainability.

- ***Government engagement and ownership:*** The approach of engaging and working closely with governments, especially the ministries of justice, foreign affairs, other line Ministries and MDAs, has been instrumental in ensuring national ownership and the localisation of the agenda at the country level. We have seen increased uptake of the BHR agenda since the Forum in Ghana, Ethiopia, Mozambique, and most recently in Zambia.

- ***Country exchange and learning:*** The Forum has served as a platform for countries to not only engage in dialogue but also learn from each other. For example, the country engagement organised for government counterparts has served as a space for countries to learn from each other's experiences. Another important example is the peer-to-peer exchange that the Forum facilitated for Nigeria and Ghana to engage on the NAP processes undertaken by both countries. The Forum has also contributed to shaping the global BHR Forum, particularly on discussions that concern Africa. The Forum is not just important to the African BHR space but also the global BHR space.

Opportunities and Next Steps

- Institutionalise the Forum as a yearly continental mechanism for assessing progress on the BHR agenda in Africa.

- Strengthening the capacity of duty- and responsibility-bearers and NHRIs to ensure that judicial reforms and access to remedies are strengthened.

- Continue to engage the private sector to increase their participation in the Forum through engagement with UNGC, IOE, and other stakeholders.

- Expand the discussions to include opportunities for youth engagement in the Forum to ensure accountability and ownership.

As we plan for the 5th year of the ABHRF, it is important to look ahead, towards continuity, strategic initiatives, and expanded stakeholder engagement that will be essential to advancing progress, informing future strategies and engagement, and delivering concrete outcomes.

From Commitment to Practice: Advancing Gender-Responsive Business & Human Rights in Ethiopia's Horticulture Sector

By Ethiopian Horticulture Producer Exporters Association (EHPEA), Ethiopia

Context

Ethiopia's horticulture is a vital agricultural sub sector playing significant social and economic roles in strengthening national food systems, driving export growth and creating widespread employment opportunity, with a large and diverse workforce, primarily women and youth in rural setting. The sub sector, which is the second largest foreign currency generator within the agricultural sector after coffee, fetches more than half a billion U.S. dollars annually from export of horticultural products while creating jobs for hundreds of thousands of citizens.

Now with more than 120 members engaged in production and export of cut flowers, vegetables, fruits, cuttings, herbs and vegetable seeds, the Ethiopian Horticulture Producer Exporters Association (EHPEA) was formed in 2002 involving only five founding members to primarily safeguard the interests of its members and promote the country's horticulture through policy advocacy and market development among other strategic interventions.

Women make up roughly 80% of the workforce in Ethiopia's horticulture subsector, and thereby demanding EHPEA to design and implement targeted gender and intersectional initiatives that advance business and human rights (BHR), promoting decent work, gender equality, responsible workplace practices and sustainable business growth. As a business membership organization of a vital economic sector, EHPEA works with diverse key actors, including member farms, government institutions, development partners, civil society and other stakeholders to translate international and national commitments into practical workplace approaches.

Challenges

In the early years of Ethiopia's horticulture industry, awareness and implementation of workplace policies on gender equality and employee welfare were relatively limited. This contributed to challenges such as high employee turnover, absenteeism, and sick leave, including those associated with SRH concerns, GBV, harassment, and workplace conflicts. Once workplace policies and standards were established, a key challenge remained in translating them into consistent practice across workplaces. Implementation was influenced by management commitment, institutional capacity, worker awareness, available resources, and the effectiveness of monitoring and follow-up systems.

Another challenge was ensuring that grievance mechanisms were accessible, trusted, and confidential. Workers needed to understand where and how to raise concerns and feel confident that complaints would be handled fairly and without retaliation. These gaps highlighted the need to move beyond compliance toward participatory and gender-responsive systems that strengthen accountability and enable workers to contribute to identifying risks and solutions.

Actions

Cognizant of the fact that ensuring gender responsiveness, safe and conducive environment are fundamentals and do have symbiotic connection with the industry business, EHPEA has been designing and implementing strategic initiatives and interventions to support member companies in strengthening gender equality and ensuring worker protection and responsible workplace practices through a combination of capacity strengthening, policy support, workplace structures, dialogue and monitoring.

One important approach is forging and strengthening of workplace gender committees. EHPEA has supported the establishment and capacity development of gender structures and trained more than 800 committee members on gender equality, prevention of gender-based violence, sexual and reproductive health and rights, grievance mechanism, hygiene and food nutrition, leadership, and worker support mechanisms. The approach is designed to move gender equality from a stand-alone issue to an institutional responsibility. Management, human resources teams, gender committees, workers and peer educators are engaged in creating awareness, identifying workplace risks and strengthening referral and support systems.

EHPEA has also supported gender audits and workplace monitoring to identify gaps in areas such as women's representation in supervisory positions, access to training, documentation and handling of grievances, and prevention of gender-based violence and harassment. Grievance and safeguarding mechanisms have been strengthened as part of this broader approach. The objective is to ensure that workers have accessible channels through which concerns can be raised and that employers have clear systems for responding appropriately.

As partnerships are central to this endeavor, EHPEA has forged strategic partnerships and been working closely with international organizations, development partners, government stakeholders, civil society and private-sector employers to develop knowledge, tools and capacity that can be applied within workplaces.

Progress

The various measures and interventions of EHPEA have been bringing about meaningful achievements in ensuring gender-responsive, safe and equitable working environment within the industry.

Thousands of workers have been reached through gender equality, rights, safeguarding and awareness-raising activities. More than 80% of participating farms have established functional Gender Focal Persons and Gender Committees, with members representing a diverse group of stakeholders, including male champions and partners, health professionals, management, trade union, general workers and other workplace committees. More than 800 gender committee members are now active after they have received capacity strengthening, creating a network of workplace actors able to continue promoting gender equality and worker protection. There has also been increased attention to institutionalizing gender-responsive approaches through workplace policies, grievance systems, gender structures and management engagement. Gender audits and monitoring have provided evidence that can be used to identify gaps and support continuous improvement.

Importantly, the experience has demonstrated that sector-level coordination can help individual businesses access technical knowledge, tools and peer learning while creating opportunities to share practical solutions across workplaces.

Lessons

A key lesson is that responsible business conduct is a continuous process rather than a one-time compliance exercise. Policies and standards are important, but their effectiveness depends on implementation, monitoring, worker participation and management commitment. Second, gender equality should be integrated into BHR processes from the beginning. Gender-responsive due diligence can help businesses identify risks that may otherwise remain invisible, particularly risks affecting women and other groups in vulnerable or marginalized situations.

Third, worker participation is essential. Workplace structures such as gender committees and peer educators can create a bridge between management and workers and help translate policies into everyday practice. Fourth, partnerships matter. Sector associations, businesses, government, civil society and development partners each bring different expertise and perspectives. Collaboration can help address capacity gaps and develop practical approaches that are relevant to local realities.

Finally, progress requires patience and sustained commitment. Businesses operating in complex contexts need practical guidance, continuous capacity strengthening and opportunities to learn from one another.

EHPEA encourages other stakeholders to move from commitments to implementation by investing in gender-responsive due diligence, meaningful worker participation, effective grievance mechanisms, management accountability and multi-stakeholder partnerships. Responsible business conduct becomes meaningful when human rights principles are reflected not only in policies, but in the daily experiences of workers and communities.

About EHPEA

The Ethiopian Horticulture Producer Exporters Association (EHPEA), established in 2002, is the leading business membership organization representing Ethiopia's horticulture industry, with more than 120-member companies and a sector workforce of over 200,000 employees, more than 75% of whom are women. EHPEA works to promote a competitive, sustainable, inclusive, and responsible horticulture industry by supporting its members in advancing decent work, labour and human rights, gender equality, worker welfare, and environmental sustainability. Through its Business and Human Rights (BHR) and Responsible Business Conduct (RBC) agenda, EHPEA supports member companies to strengthen human rights due diligence, responsible workplace practices, effective grievance mechanisms, gender-responsive management, prevention of workplace harassment, occupational health and safety, and worker engagement. Through capacity building, technical assistance, policy dialogue, and multi-stakeholder collaboration, EHPEA contributes to embedding responsible business practices across the horticulture sector and advancing respect for human rights throughout the workplace and value chain.



Advancing Responsible Business Conduct for Minority Communities in Somalia

By Agency for Minority Rights and Development (AMARD)

The Agency for Minority Rights and Development (AMARD) was established in 2012 in Baidoa, Somalia, to protect the rights, dignity and socio-economic well-being of marginalized and minority communities. Headquartered in Baidoa, AMARD also operates regional offices in Mogadishu Somalia. The organization has been registered in Kenya since 2024, further expanding its regional presence. The organization works directly with minority groups, internally displaced persons (IDPs), women and girls, persons with disabilities, children and other vulnerable populations, including the Gabooye/Madhiban, Bantu/Jareer, and Benadiri/Reer Hamar communities in Baidoa in Somalia.

Minority communities and IDPs in Somalia continue to experience widespread discrimination and exclusion from land ownership, legal protection, education, employment and financial services. The European Union Agency for Asylum (EUAA) reports that minority groups often lack secure land tenure, live in informal settlements and face a heightened risk of forced evictions, while discrimination within customary and formal justice systems limits their access to legal remedies. Likewise, UNHCR's 2025 Annual Results Report found that secure housing and land tenure among IDPs, refugees and asylum seekers remained virtually nonexistent nationwide, highlighting persistent land insecurity. Educational access also remains critically low. According to the International Monetary Fund (IMF), 65.5% of Somalia's population has no formal education, fewer than 5% have completed secondary school and only 39% of children are enrolled in primary education with girls, nomadic populations and poor households being the most disadvantaged. UNDP (2025) further notes that high youth unemployment, poverty and limited access to finance continue to prevent women, youth, IDPs and minority communities from participating fully in the economy.

AMARD integrates the United Nations Guiding Principles on Business and Human Rights (UNGPs) into all its programmes. Through human rights and conflict-sensitive risk assessments, the organization identifies and mitigates risks related to discrimination, exclusion, gender-based violence and unequal access to services. These risks are addressed through community consultations, inclusive programming, safeguarding measures, staff capacity building and partnerships with government institutions, civil society and humanitarian actors. Progress is monitored through field visits, protection monitoring, beneficiary feedback mechanisms and periodic evaluations while confidential complaints systems, referral pathways, survivor-centred case management and mediation ensure accountability and access to remedies.

To address economic exclusion, AMARD promotes sustainable livelihoods through business and entrepreneurship training, 2024 with UNFPA support we trained 100 women and girls on vocational skills development, financial literacy, micro-enterprise support, savings mechanisms, start-up assistance, and referrals to inclusive financial services. The organization also recognizes that limited access to affordable education significantly restricts opportunities for marginalized youths, also in 2024 with UNFPA funding we send 120 girls back to school to enlightens their knowledge. AMARD recongnizes that marginalized youth due to their restricted access to quality education can lead to negative coping strategies for young people, increase in the risk of harmful coping mechanisms such as child labour, early and forced marriage and recruitment into armed groups. Through integrated protection, education and livelihood interventions, AMARD seeks to build resilience and promote the long-term inclusion of Somalia's most vulnerable communities.

AMARD also promotes private sector investments within IDP settlement areas as well as surrounding areas. Investments should be preceded by enhanced human-rights due diligence and meaningful community consultation.

> ***We encourage businesses to realize that IDP settlement areas are not solely humanitarian spaces but rather emerging local markets with substantial economic potential.***

Moreover, we support entrepreneurship development by providing business training, mentoring, vocational skills development, market linkage and startup funding opportunities, this post assistance monitoring specifically targeting women and youth. AMARD engages with communities to raise awareness through safe referral pathways, case management, safeguarding, GBV and child-protection services about child rights, gender equality, disability inclusion and harmful traditional practices. Community engagement remains paramount in all interventions to enable minority voices to influence program design, implementation and evaluation.

However, progress has been made in several ways such as, promoting the rights and inclusion of marginalized communities in Somalia. Community awareness of land rights and protection issues has increased, strengthening advocacy for secure land tenure and fostering greater engagement between local communities and government authorities. Livelihood and entrepreneurship initiatives have enabled vulnerable households to establish micro-enterprises, diversify income sources and reduce dependence on humanitarian assistance. Women and youth are increasingly participating in local economic activities, demonstrating that inclusive business models can promote economic empowerment and social resilience.

Collaboration and dialogue among communities, humanitarian organizations, governments and the private sector have also improved considerably. More businesses now recognize that respecting human rights and engaging marginalized populations contributes to social stability, sustainable economic opportunities and reduced operational risks. Community awareness campaigns have further increased knowledge of child protection, encouraging education and other positive alternatives to child labour, violence and exploitation. AMARD's experience demonstrates that responsible business conduct extends beyond regulatory compliance. By integrating human rights into development programming, the organization has shown that inclusive business practices can reduce inequality, strengthen resilience and support sustainable development in fragile and conflict-affected settings.

Several key lessons have emerged from AMARD's work. First, meaningful inclusion requires treating marginalized and minority communities as active partners rather than passive beneficiaries. Sustainable outcomes are achieved when communities participate in identifying challenges, designing solutions and monitoring progress. Secondly, effective human rights due diligence must intentionally include the experiences and perspectives of marginalized groups, as conventional risk assessments often overlook systemic discrimination. Thirdly, strong partnerships are essential to addressing the complex barriers facing vulnerable populations.

AMARD works closely with organizations including OCHA, UNFPA, IOM, UNICEF, government institutions, civil society organizations, humanitarian agencies, donors and private sector actors, recognizing that no single organization can resolve these challenges alone. Fourthly, economic inclusion should be integrated into protection strategies through investments in entrepreneurship, vocational training, education, financial inclusion and decent work opportunities that reduce vulnerability and promote long-term resilience. Finally, responsible business conduct should embrace the principle of "Leaving No One Behind" by embedding human rights throughout business operations, supply chains, employment practices and community engagement.

AMARD therefore calls on governments, development partners, businesses and civil society organizations to strengthen collaboration in promoting inclusive procurement and recruitment, accessible financial services, secure land tenure, minority representation, mandatory human rights due diligence and effective grievance and remedy mechanisms. By translating dialogue into coordinated action, stakeholders can foster inclusive economic growth, protect human rights, reduce inequality and contribute to lasting peace and sustainable development for Somalia's most marginalized communities.

> ***Responsible business conduct should embrace the principle of "Leaving No One Behind" by embedding human rights throughout business operations, supply chains, employment practices and community engagement.***

About the Agency for Minority Rights and Development (AMARD)

The Agency for Minority Rights and Development (AMARD) is an independent, non-profit organization established in 2012 in Baidoa, Somalia, dedicated to advancing the rights, dignity and socio-economic inclusion of minority communities, internally displaced persons (IDPs), women, girls, children and other vulnerable groups in Somalia and the Horn of Africa. AMARD integrates Business and Human Rights (BHR) and Responsible Business Conduct (RBC) principles across its programmes, focusing on human rights due diligence, inclusive economic participation, secure land tenure, livelihoods, protection and meaningful community engagement. AMARD works with communities, government institutions, humanitarian and development partners, civil society and the private sector to address discrimination, exclusion and barriers to economic opportunity through entrepreneurship and vocational training, protection services, advocacy and community-based monitoring, AMARD promotes responsible investment and inclusive business practices that respect human rights and contribute to resilience, sustainable development and the principle of Leaving No One Behind.

Actioning Remedy - Cultivating Justice in Kenya's Agribusiness Sector

By the Cultivating Justice Partnership (Centre for Education Policy and Climate Justice (CEPCJ), Pamoja Trust and DCA)

About the Project

Cultivating Justice, a European Union-funded project implemented by DanChurchAid (DCA) in partnership with Pamoja Trust and the Centre for Education Policy and Climate Justice (CEPCJ), seeks to enhance responsible business conduct (RBC) within Kenya's agriculture sector. The project focuses on empowering civil society, facilitating access to remedy, and promoting meaningful multistakeholder dialogue. Implementation is currently underway in Nakuru, Nyandarua, and the Nairobi metropolis, including Kajiado, Kiambu, Machakos, Murang'a, and Nairobi City counties. The project's focus is on building the capacity of stakeholders to identify, prevent, monitor, remediate and report on human rights violations depending on their role in the agriculture value chain. The project is currently in its second year of implementation and the partners have gleaned several lessons that demonstrate the opportunity that lies within Kenya and in the region to move responsible business conduct from dialogue to practice.

Interventions building the infrastructure for Pillar III

1. Strengthening the Local Foundations of Responsible Business Conduct in Kenya- Pamoja Trust

Through the Cultivating Justice project, Pamoja Trust is contributing to the operationalisation of Responsible Business Conduct (RBC) by working at the point where business related human rights commitments meet the realities of communities, human rights and environmental defenders (HREDs), civil society and government institutions. Our experience shows that responsible business conduct cannot be achieved through policies and commitments alone, it requires communities and rights actors to have the knowledge, evidence, platforms and institutional linkages needed to identify rights risks, engage duty bearers and seek appropriate remedy.

A key emerging practice has been strengthening the capacity of HREDs and grassroots actors to understand and engage with the RBC framework. Through dialogues, capacity-building and safety assessments, HREDs have been supported to better connect and document local human rights concerns including land, livelihoods, access to services and environmental impacts to the responsibilities of businesses and the State under the UN Guiding Principles on Business and Human Rights (UNGPs). This has helped shift conversations from viewing business related human rights concerns as isolated community grievances towards understanding them as issues of prevention, accountability and access to remedy.

The project has also demonstrated the importance of creating practical links between grassroots evidence and national policy processes. Pamoja Trust has engaged HREDs, community-based organisations, civil society actors and other stakeholders in discussions informing the review and implementation of Kenya's National Action Plan on Business and Human Rights. These engagements have brought community experiences into conversations that can otherwise remain largely policy-level. The process has reinforced the value of evidence generated by communities and HREDs in identifying implementation gaps and informing national responses.

Another important lesson has been that RBC requires stronger connections between different justice and accountability pathways. Pamoja Trust's work on Alternative Justice Systems (AJS), land rights and access to justice provides an important entry point for considering how communities experiencing business-related impacts can navigate different mechanisms for resolving disputes and seeking remedy. Engagement with justice actors and community structures is helping to build greater understanding of the relationship between formal and community-based mechanisms, while also highlighting the need to ensure that such pathways are rights-based, accessible and responsive to affected communities.

The project has further demonstrated that the protection of HREDs is itself an important part of responsible business conduct. HREDs who document land, environmental and business-related human rights concerns often face physical, digital, legal and psychosocial risks. Pamoja Trust's safety assessments and follow-up capacity-building have therefore expanded the RBC conversation beyond the conduct of businesses to include the enabling environment required for people to safely raise concerns, document violations and participate in accountability processes. A key lesson from Pamoja Trust's engagement is therefore that operationalising RBC requires investing in the actors and systems that connect policy to lived experience.

2. Emerging practices and lessons from the Cultivating Justice Project

One of the key areas of CEPCJ's work under the Cultivating Justice Project has been engaging institutions of higher education to promote Responsible Business Conduct (RBC). Our partnerships with Universities focus on integrating RBC into academic curricula and creating opportunities for students to explore these issues through student hackathons. Bringing RBC into the classroom helps students understand that responsible business is not only about making profits or complying with regulations. It also involves considering the ethical, social, environmental and human rights impacts of business decisions. The hackathons then give students an opportunity to take these ideas beyond the classroom and apply them to real business challenges. These partnerships have also created a useful space for Universities and the private sector to learn from each other. Businesses can share practical experiences, challenges and new ideas, while universities can bring these perspectives into their teaching. At the same time, businesses get an opportunity to engage with young people who may become future employees, entrepreneurs and leaders.

We are working with both public and private universities because we see them as more than institutions that prepare young people for the job market. Universities can play an important role in shaping how the next generation thinks about business and its responsibilities to society. This is particularly important because RBC can sometimes feel abstract when it is discussed mainly through international standards, corporate policies and compliance requirements. Working with students allows us to introduce these ideas earlier and, importantly, to discuss what they look like in practice. Through real-world challenges, students begin to grapple with the difficult choices businesses often have to make when commercial interests come up against social, environmental or governance concerns. Another important lesson from the project has been the value of working directly with grassroots private-sector organizations at the county level. This training strengthens their ability to understand and apply responsible business practices in their own contexts.

This includes helping organizations better understand relevant laws and standards, improve workplace practices, protect the environment and build more meaningful relationships with the communities in which they operate. When local organizations have the knowledge and confidence to support others, they can become champions for responsible business within their own networks. County-level engagement also creates an opportunity for businesses to learn from one another. Local peer support, mentorship and accountability can make responsible business practices more practical and sustainable, rather than something driven only by external requirements. For CEPCJ, one of the emerging lessons from the Cultivating Justice Project is that responsible business conduct is most effective when it is connected to the people and institutions that shape business practice every day.

3. FSTP, Multistakeholder Dialogues & Grievance Handling

Under the Cultivating Justice project, DanChurchAid (DCA) has translated the abstract promise of access to remedy into a concrete operational pathway by anchoring it in Financial Support to Third Parties (FSTP) mechanism, capacity building of private sector actors on grievance handling mechanisms and facilitating multistakeholder engagements, bringing together duty bearers and private sector actors.

FSTP has functioned less as a conventional sub-granting line and more as a deliberate remedy-delivery mechanism in its own right. By channelling grants directly to CSOs, grassroots organisations and HREDs already embedded in Nakuru, Nyandarua and Nairobi communities, the model is designed to allow evidence of human rights violations to be gathered by actors who already hold community trust, shortening the distance between an incident occurring and it being formally recorded. The project has two remedy facing grant windows: one intended to finance structured mapping and documentation of abuses, the other resourcing outreach legal clinics, case-strategy development and representation before courts, Non-Judicial Grievance Mechanisms (NJGMs), Alternative Justice Systems (AJS) or independent accountability mechanisms (IAMs).

> ***A key lesson from this design is that access to remedy in agribusiness contexts is rarely blocked by an absence of legal avenues, but by the absence of resourced intermediaries able to walk aggrieved parties, often smallholder farmers and workers with little capacity to independently sustain a claim, through them.***

The third FSTP grant extends financing to artists, musicians and storytellers to build public RBC awareness. This underscores a second lesson: that formal remedy mechanisms only function at scale where affected populations recognise a violation as actionable in the first place, making public-facing awareness-building as much a remedy input as legal financing itself.

Multistakeholder dialogues and grievance-handling workshops have supplied the connective layer that FSTP-financed casework alone could not: a structured space where evidence generated at community level is surfaced to the institutions positioned to act on it. The experience and engagement so far during these dialogues points to a recurring tension worth flagging for future iterations: rights-holders and the CSOs representing them risk being perceived by some duty-bearers as adversarial to economic development, which can quietly undermine the willingness of state and private actors to engage candidly, a risk.

On the private-sector side, the grievance-handling workshops offer a distinct lesson: capacity-building alone rarely produces functioning complaints mechanisms unless paired with peer exposure, since agribusinesses appear far more willing to adopt grievance-handling practices after seeing functioning examples from other companies than after training input alone. Read together, the interventions suggest that remedy is best advanced not as a single transaction between a rights-holder and a duty-bearer, but as a pipeline, documentation feeding dialogue, dialogue feeding policy and institutional change, and peer learning feeding voluntary uptake by business, where the weakest link determines how far any single case of harm actually travels toward resolution.

About The Partners

Pamoja Trust

Pamoja Trust is a non-profit organization founded in 1999. The organization is dedicated to promoting access to land, shelter and basic services for the Urban Poor. It takes principled and pragmatic approaches to protection and promotion of the right to the city through advocacy and precedence dotting models for problem solving. Pamoja provides social, technical and legal expertise at local community, national and international levels to ensure that urban growth and urbanism adhere to social justice principles and that national and international human rights standards are implemented in favor of the most vulnerable citizens.

Centre for Education Policy and Climate Justice (CEPCJ)

The Centre for Education Policy and Climate Justice (CEPCJ) is a pioneering woman-led organization dedicated to advancing climate justice through research, policy advocacy, and strategic litigation. CEPCJ aims to be a global leader in promoting access to justice for vulnerable and marginalized communities affected by climate change. CEPCJ has a strong commitment to equity, human rights, and climate justice. It is based in Nairobi, Kenya. CEPCJ aims at building the capacity of businesses both in country and regionally in issues of just transitions and loss and damage. The principle of “just transition”, integral to the Paris Agreement, aims for fair, inclusive decarbonization that leaves no one behind, linking it to sustainable agribusiness systems and SDG 2 is a natural extension. Strong policy frameworks that promote sustainability, equity, and social justice in the food systems also provide the necessary support and guidance for a just transition. CEPCJ advocates for the uptake of HRDD in order to advance responsible business conduct.

Developed based on Guidance: Restoring Faith in Remedy — How faith actors can enable community driven grievance mechanisms

By the Fellowship of Christian Councils and Churches in the Great Lakes and Horn of Africa (FECCLAHA), Swedwatch, and Act Church of Sweden

Context

Extractive operations in the Great Lakes and Horn of Africa are linked to persistent and severe harms across five interrelated dimensions: environmental, health, economic, violence, and land rights. International responsible business conduct guidelines require companies to establish grievance mechanisms to handle complaints and provide or participate in remedies for harms they cause or contribute to. However, impunity for harms linked to extractives operations remains common as grievance mechanisms are often unfit for purpose. This has created a trust deficit for communities across the region who mistrust the safety and effectiveness of seeking remedy. Without effective remedy pathways, extractives impacts are more likely to escalate conflict dynamics.

Faith actors play essential roles supporting extractives impacted communities but are often disconnected from extractives companies and those with leverage over them within extractives value chains. In this context FECCLAHA, Swedwatch, and Act Church of Sweden have worked with faith actors across the region to develop a guidance note which outlines the role of faith actors, design and enabling factors for community-driven remedy, and recommendations for integrated value chain engagement to strengthen community-driven pathways to remedy.

Challenge: Poor performing grievance mechanisms and limited pathways to remedy

Across the region communities face remarkably consistent barriers to accessing remedy through grievance mechanisms including:

- civic space restrictions which undermine investigations and the tactics communities use to seek justice,
- lack of awareness and inaccessible information,
- opaque, slow and abusive procedures,
- intimidation and inadequate protection measures,
- and limited trust in designated representatives.

These barriers are found even in cases which have been formally audited, meaning that common due diligence practices of value chain actors linked to extractives operations are unlikely to capture them. Access to remedy is further complicated within the growing Artisanal and small-scale mining (ASM) sector which is often unregulated.

Actions: Working with faith actors towards a community-driven approach

The guidance note was developed building from six years of collaboration between FECCLAHA, Swedwatch, and Act Church of Sweden including regional learning forums, a pilot program in Tanzania (in collaboration with the Christian Council of Tanzania – CCT), interviews with faith leaders and impacted community members, independent site-specific research and a review of secondary literature.

The guidance identifies features to faith-based engagement which address barriers to justice identified above:

- Faith actors are the most trusted institution in the region (according to Afrobarometer data), and often first points of contact for impacted community members.
- Faith leaders and institutions are constantly present in communities with structures that enable continuous follow-up of grievances.
- Faith leaders have advocacy platforms that enable grievances to be escalated to national, regional and global platforms for change.
- Faith leaders support conflict resolution, reconciliation and healing, which is essential when addressing prolonged harms.

Given these roles, the guidance calls for faith actors to be considered as part of a diffuse representation of communities in due diligence processes. This guidance identifies 16 design factors and six enabling factors for community-driven grievance mechanisms. These were developed collaboratively with faith leaders in the region. They offer a template which can be contextualised to communities and serve as a starting point for dialogue with companies.

Through targeted recommendations to value chain actors ranging from investors, retail companies, and public buyers with minerals in their value chain, the guidance seeks to create a bridge between growing interest from value chain actors to engage on these issues and community-driven platforms for engagement.

Progress: What is emerging from the approach

While the work around this guidance is nascent there are few early indications of progress.

1. A platform for coordinated regional action. The guidance note was adopted in the Arusha Commitment on Business, Human Rights and Environment in which 7 general secretaries of the Councils of Churches in the region agreed to adapt, contextualise and implement the guidance note through coordination and collaboration across the region with faith actors, civil society, legal actors, trade union, media and other stakeholders.

2. Early engagements with public buyers, purchasing companies and investors have demonstrated an interest to link their leverage with the community-driven approach enabled by faith-based engagement. The partners are working to develop a regional monitoring network which connects impacted communities to the leverage of these actors. However, it remains to be seen whether this will translate into concrete impacts for impacted communities.

3. A pilot program in Tanzania (in collaboration with– CCT) with two gold mining communities has led to sustained dialogue between faith leaders, community members, companies and government representatives around various grievances, including one case in which a resettlement process marked by unfair, prolonged and abusive compensation practices was halted pending independent review.

Lessons

- Regional networks can support community-level engagement. Common due diligence practices fail to capture both harms and poor performing grievance mechanism. For companies, investors and public buyers meaningfully engaging with impacted communities is often described as challenging due to wide exposure within their value chains to extracted impacted communities. Networks, including faith-based networks, can play an important role in facilitating this engagement. Faith-based organising which spans from community-level churches and mosques to district, national, regional and international structures can support wider engagement. See the guidance note for more specific recommendations.

- Trust requires starting with independent community partners. Common practices have taught communities to distrust grievance mechanisms. Working with independent community structures strengthens both the trust in mechanisms and their effectiveness to address community priorities.

- True community-driven pathways to remedy requires resourcing. The enabling factors identified in our Guidance show that meaningful pathways to remedy require technical support (e.g. legal aid), financial support including for organising, and value chain transparency. For funders interested in supporting a just transition, addressing this imbalance of resources is a must.

- Without protection meaningful engagement is impossible. Growing civic space restrictions and collusion between governments and companies to repress investigations and community organising render grievance mechanism and formal due diligence unsafe and unreliable. Addressing growing protection and civic space concerns is the responsibility of all actors in these value chains.

About FECCLAHA

Established in March 1999, Fellowship of Christian Councils and Churches in the Great Lakes and Horn of Africa (FECCLAHA) is a regional Christian organization consisting of National Councils of Churches and Churches in the Great Lakes region and the Horn of Africa. It was registered in Kenya February 2001 with its mandate being to promote strong Christian cooperation among its members to take ownership and responsibility for challenges affecting Peace and Social Cohesion in the region and facilitating them to proactively seek solutions to the same.

About SWEDWATCH

Swedwatch is an independent, non-profit research organization dedicated to promoting responsible business practices and empowering rights holders. We achieve this by exposing the human and environmental impacts of unsustainable business operations and fostering collaboration between stakeholders to drive meaningful change.

About Act Church of Sweden

Act Church of Sweden is the international work of the Church of Sweden, working alongside local communities, churches and civil society organisations to promote human dignity, justice, peace and sustainable development. Guided by faith and a commitment to solidarity with people living in poverty or marginalisation, it supports humanitarian response, long-term development cooperation and advocacy efforts to challenge inequality and contribute to lasting social change. Through a global network of more than 300 partners, Act Church of Sweden works to strengthen local capacities and advance rights-based solutions worldwide.

IMPACT
Indigenous Movement for Peace Advancement and Conflict Transformation

From Dialogue to Practice: Community-Led Accountability in Kenya's Renewable Energy Sector

By the Indigenous Movement for Peace Advancement and Conflict Transformation (IMPACT)

Context

Across Kenya's Rift Valley and Northern rangelands, geothermal, wind and solar investments are expanding rapidly to meet national clean energy targets. These large-scale, land-based projects are concentrated in areas where indigenous pastoralist communities depend on communal, largely unregistered land for their livelihoods.

Under the project "Enhancing Accountability of Investors through Inclusive Community-Driven Actions," IMPACT engaged pastoralist rights-holders in Marsabit, Nakuru (Olkaria) and Narok (Suswa) counties between January 2025 and February 2026, working with investors including KenGen and the Geothermal Development Company (GDC) across the three projects. The intervention sought to operationalize the UN Guiding Principles on Business and Human Rights (UNGPs) Pillar II (Corporate Responsibility to Respect) and Pillar III (Access to Remedy) and Kenya's National Action Plan on Business and Human Rights (NAP- BHR) by bridging the gap between corporate investors and affected communities, in partnership with the Kenya National Commission on Human Rights (KNCHR).

Challenge

The central challenge was the systemic exclusion of indigenous communities from decision-making, compounded by unoperationalized Free, Prior and Informed Consent (FPIC) processes and the absence of accessible grievance channels. In Marsabit, disputes over the proposed KenGen wind project's naming and siting fueled tensions among five indigenous communities; El Molo, Rendille, Gabra, Samburu and Turkana each asserting competing claims to project benefits.

In Nakuru and Narok, and around GDC's geothermal prospects in Suswa, Menengai and Baringo, communities faced company-appointed, “elite-captured” stakeholder and grievance committees that lacked negotiation skills and local legitimacy, boundary disputes, such as between Turkana and Baringo counties over the Silali prospect, rendering compensation processes impossible. Existing operational-level grievance mechanisms were named bureaucratic and largely inaccessible by indigenous communities, with unclear timelines, weak referral pathways and delayed feedback, driving low uptake and unresolved disputes. Underlying it all were sharp information asymmetries, high illiteracy and technical complexity leaving rights-holders unable to hold investors accountable or engage meaningfully in human rights due diligence (HRDD).

Actions

IMPACT implemented a tiered advocacy strategy combining grassroots capacity-building with institutional leverage founded on a baseline survey undertaken before this project highlighting impacts of renewable energy projects on indigenous communities. First, IMPACT partnered with KNCHR, whose constitutional mandate helped compel the two state agencies to participate in dialogue. Second, IMPACT held pre-dialogues with communities to consolidate grievances and build a unified voice, and negotiation skills. Third, IMPACT and KNCHR co-convened multi-stakeholder mediation forum in Marsabit bringing together KenGen, County government officials, Members of County Assembly and community representatives to address land tenure, project siting, naming and consultation challenges.
In parallel, IMPACT and KNCHR delivered a three-day training for GDC officers on business and human rights, FPIC and effective grievance mechanisms, mapping the social risks specific to geothermal development and identifying institutional gaps in existing community-engagement practice.

IMPACT also co-designed a Community-Led Grievance Redress Mechanism (CGRM) directly with affected communities, a hybrid, eight-step Alternative Dispute Resolution toolkit that embeds formal procedural safeguards clear timelines, documented steps and defined escalation pathways within existing community dispute-resolution structures, and is overseen jointly by communities, the company and local administration.

Progress

The Suswa CGRM was validated and launched on 17 February 2026, giving communities a predictable, accessible, non-judicial remedy mechanism that they own and run themselves with County officials present and who indicated an interest in extending the model across all companies operating in the county including other energy projects, infrastructure and extractive alike as a unified engagement standard.

Through the joint KNCHR-IMPACT engagement, KenGen committed to halting land acquisition in designated areas until communal land registration is legally concluded and agreed to retain the project name “Marsabit Wind Power Project I” on a provisional basis pending further community validation. The Marsabit County Government confirmed that Community Land Management Committees had already been constituted and inducted in three wards, with adjudication targeted for completion in early 2026.

Lessons

Partnering with KNCHR gave IMPACT the institutional leverage to compel corporate participation; equally, co-designing tools like the CGRM directly with rights-holders, rather than imposing top-down CSR mechanisms, proved essential to their legitimacy and long-term uptake.

The most persistent constraint was unresolved land tenure. Without registered community land under the Community Land Act (2016), communities remain structurally vulnerable to land loss, with a minimal role in benefits and compensation negotiations despite dialogue outcomes. Elite capture of engagement committees, and political interference and misinformation also continued to slow progress and strain trust.

We recommend that businesses adopt CGRMs as the standard for operational-level grievance mechanisms, engaging democratically elected Community Land Management Committees rather than hand-picked stakeholder representatives. Governments should mandate verified communal land registration and mandatorily enforce FPIC as a legal prerequisite for issuing energy licenses in pastoralist territories, and resource land adjudication accordingly.

About IMPACT

IMPACT Kenya is an Indigenous-led organisation working to advance the rights, self-determination and well-being of Indigenous Peoples in Kenya. Through securing communal land rights, promoting inclusive laws and policies, supporting sustainable livelihoods and ecosystems, and safeguarding traditional knowledge, IMPACT Kenya works with communities and partners to strengthen resilience, protect cultural heritage and foster inclusive development. The organisation is committed to accountability, collaboration and community-centred approaches that enable Indigenous Peoples to shape their own futures.

Deutsche Gesellschaft
für Internationale
Zusammenarbeit (GIZ) GmbH

From Dialogue to Practice: Advancing Responsible Business Conduct in the Horn of Africa and East Africa

By the EU Due Diligence Navigator for Partner Countries

Navigating a changing due diligence landscape: What the CSDDD means for stakeholders in EU partner countries

Context

Human rights and environmental due diligence (HREDD) is increasingly shaping how companies manage operations and value chains. The UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct have long established expectations for companies to identify, prevent, mitigate and account for adverse impacts on people and the environment. In recent years, these voluntary standards have increasingly been complemented by binding legislation.

The EU Corporate Sustainability Due Diligence Directive (CSDDD), adopted in 2024, marked an important step in this development. Yet its subsequent trajectory also illustrates how quickly the regulatory landscape can change. Following the EU's simplification process, the Directive was substantially revised in 2026. Its scope is now focused on very large companies: Companies based in the EU with more than 5,000 employees and more than EUR 1.5 billion in global turnover, as well as companies based outside the EU generating more than EUR 1.5 billion in net turnover in the EU market. The revised rules will take effect from July 2029.

While the CSDDD does not directly impose obligations on most businesses or other stakeholders in EU partner countries, developments in EU due diligence regulation can have implications for companies and value-chain actors in these countries. They may also create opportunities for governments, civil society organisations, trade unions and other stakeholders to engage with evolving expectations around responsible business conduct. The key question is therefore: How can stakeholders in EU partner countries navigate a changing due diligence landscape and understand the expectations and opportunities arising from these developments?

Challenges

The first challenge is distinguishing direct legal obligations from broader value-chain effects. Most companies in EU partner countries will not be directly subject to the CSDDD, although some large non-EU companies may fall within its scope. Many other businesses and value-chain actors may nevertheless experience indirect effects, such as requests for information, changes in procurement practices or greater scrutiny of human rights and environmental risks. The amended CSDDD aims to make such information requests more targeted and proportionate.

A second challenge is avoiding the equation of due diligence with compliance paperwork. Questionnaires, supplier codes and audits can support due diligence, but effective HREDD requires companies to understand their impacts, engage with affected stakeholders, prioritise the most severe and likely risks, and take appropriate action. Effective due diligence is risk-based: companies should focus attention and resources where adverse impacts are most likely and most severe. A third challenge is navigating a fragmented support landscape. Guidance, tools, trainings and initiatives are available, but identifying the right support for a particular country, sector or challenge can be difficult – especially for SMEs and other organisations with limited specialist capacity.

Actions

In 2023, the European Commission and selected EU Member States launched the Team Europe Initiative Sustainability in Global Value Chains (TEI) to strengthen and coordinate support for stakeholders in partner countries in response to evolving due diligence requirements. As part of the TEI, the EU Due Diligence Navigator for Partner Countries was established to help stakeholders understand how the EU's CSDDD and related developments may affect them and to identify relevant support on human rights and environmental due diligence.

The Navigator provides tailored support for different stakeholders. Companies can use it to prepare for expectations from EU-based buyers and investors and strengthen their position in global value chains. Civil society organisations, trade unions and rights-holders can use due diligence as an entry point for engagement, access to information and accountability, helping companies identify impacts that may not be visible through corporate data alone. Governments and public institutions can use it to connect national business and human rights frameworks, labour and environmental governance, trade and investment policies and business support in ways that promote responsible and competitive value chains that attract investment.

Progress

The Team Europe Initiative has provided the European Commission and participating EU Member States with an overview of their respective activities, supporting more coordinated project programming, mutual reinforcement and the avoidance of duplication. For stakeholders in partner countries, this contributes to a more transparent support landscape and makes it easier to identify relevant support.

The EU Due Diligence Navigator puts this coordination into practice by making TEI project data publicly accessible in one place. It currently brings together approximately 300 support measures provided by the European Commission, participating EU Member States, and international organisations. Users can filter the database according to their specific needs, helping businesses, governments and civil society stakeholders identify relevant support and navigate the evolving due diligence landscape.

Lessons

The changing regulatory landscape offers a clear lesson:

> ***Do not chase regulation. Regulatory frameworks will continue to evolve. However, the underlying international standards on responsible business conduct provide a more durable foundation. Companies that build risk-based systems to identify and address impacts are better prepared for changing regulation, customer expectations and market conditions.***

For stakeholders in partner countries, navigation matters as much as regulation. Understanding the latest legal text is only the starting point. Stakeholders also need to understand what these developments mean for their position in the value chain, distinguish actual from perceived requirements, identify opportunities as well as risks, and know where to find relevant support. A third lesson is that multi-stakeholder dialogue matters. Businesses, governments, workers and civil society see different parts of the same value chain. Bringing those perspectives together can help identify risks more accurately, avoid unintended consequences and address systemic challenges that individual companies cannot tackle alone.

Ultimately, successful due diligence should not be measured by the number of questionnaires completed or policies adopted but by whether business practices improve outcomes for workers, communities and the environment while supporting sustainable and resilient value chains.

About The EU Due Diligence Navigator for Partner Countries

The EU Due Diligence Navigator for Partner Countries is funded by the European Commission (DG INTPA) and the German Federal Ministry for Economic Cooperation and Development (BMZ), with additional support from the Swedish Ministry for Foreign Affairs, SIDA and the Ministry of Foreign Affairs of the Netherlands. The Navigator is part of the Team Europe Initiative (TEI) on Sustainability in Global Value Chains (Secretariat: GIZ). This TEI serves as the essential bridge for partner countries transitioning from voluntary guidelines to prepare for the due diligence expectations stemming from the Corporate Sustainability Due Diligence Directive (CSDDD). The Navigator is an online platform designed to help governments, businesses and civil society in partner countries better understand and respond to upcoming EU due diligence expectations. It features a user-friendly database of initiatives developed by EU Member States, the European Commission, and international organizations supporting human rights and environmental due diligence.

PAYA-BHR
Pan-African Youth Alliance for Business and Human Rights

From Participation to Influence: Building Meaningful Youth Engagement in Business and Human Rights in Africa

By Eric Baeni, Founder and Coordinator of PAYA-BHR

Introduction

The Agenda 2063, envisions an Africa whose development is people-driven and relies explicitly on the potential of its youth, with citizens actively involved in decision-making (African Union, 2015). The African Youth Charter similarly recognises young people's right to participate in decision-making and calls for mechanisms that enable their meaningful participation in the development and implementation of policies and programmes (African Union, 2006). Furthermore, this active engagement is vital for achieving the United Nations 2030 Agenda for Sustainable Development, as the Sustainable Development Goals (SDGs) explicitly require youth innovation, partnerships, and leadership to foster inclusive economic growth and guarantee human rights for all (United Nations, 2015).

Young Africans are already driving change across the continent, including on climate and environmental justice, gender equality, peace and security, migration, technology and innovation, entrepreneurship, extractives, decent work, trade and investment, human rights and community development. Yet, despite their leadership and proximity to these issues, young people often face significant barriers to accessing the policy-making, decision-making and accountability spaces where the priorities and responses affecting their lives and communities are shaped. Their participation can remain fragmented, consultative or limited to spaces specifically designated for youth, rather than being embedded across broader policy and governance processes.

Yet this challenge is particularly visible within the Business and Human Rights (BHR) agenda, where youth participation remains uneven and often disconnected from the broader work young people are already advancing. For many young Africans, BHR can appear as a specialised and technical field, with frameworks, standards, institutions and mechanisms that are difficult to understand and navigate.

This can make it harder for young people to see where their existing work connects to BHR, identify pathways for engagement, and translate their experience and leadership into meaningful influence within BHR processes. The challenge, therefore, is not simply to create more opportunities for youth participation, but to bridge this gap and strengthen the conditions for young people to engage, contribute and influence the agenda.

What is the key challenge we are trying to address?

The experience emerging from youth engagement around Business and Human Rights (BHR) in Africa points to a fundamental gap between participation and influence. Young people are increasingly recognised as important stakeholders, yet recognition and invitations to participate do not automatically translate into the ability to shape policies, business practices and accountability mechanisms. At the same time, BHR can still feel distant from the realities and everyday work of many young Africans. The field is often presented through specialised frameworks, legal and policy language, standards, institutions and mechanisms that can be difficult to understand and navigate. This can create a perception that BHR is a specialised space reserved for experts, lawyers, policymakers or established organisations, rather than an agenda that connects directly with the issues young people are already working on.

The UN Guiding Principles on Business and Human Rights (UNGPs) provide the foundational Protect, Respect and Remedy framework, clarifying the State duty to protect human rights, the corporate responsibility to respect human rights, and the need for access to effective remedy (OHCHR, 2011). Yet the challenge is not simply whether these frameworks exist; it is whether young people can understand them, recognise their relevance, access the spaces where they are applied, and use them to advance the issues affecting their communities.

For young people working on environmental and climate justice, extractives, labour, migration, technology, peace and security, gender equality, entrepreneurship, trade and investment, human rights or community development, BHR may not initially appear to be part of their field. Yet much of their work is already connected to core BHR questions: whose rights are affected by business activity, how risks are identified and prevented, who has a voice in decisions, and how accountability and remedy are secured. This points to a broader challenge of democratising BHR spaces. The objective is not to dilute the technical substance of BHR, but to make its knowledge, language, frameworks, mechanisms and decision-making spaces more accessible and navigable, particularly for young people who are already engaging with the realities that BHR seeks to address.

The challenge, therefore, is not to bring young people into BHR by asking them to leave behind the work they already do. It is to build bridges between their existing leadership and the BHR architecture, giving them the knowledge, networks, confidence and institutional pathways to connect, participate, contribute and influence. This is the operational gap that PAYA-BHR seeks to address: connecting Africa's existing youth leadership with the BHR ecosystem and creating pathways for young people to become not only participants in the agenda, but active actors in shaping it.

How are we addressing this in practice?

> ***PAYA-BHR's approach is built around a simple principle:***
> ***young people should not only participate in the BHR agenda; they should have the knowledge, networks and collective space to help shape it.***

The *first* priority is to *build a Pan-African youth constituency* that connects young people across countries, sectors and movements. [PAYA-BHR] recognises that a young professionals who act as environmental defender, entrepreneur, researcher, lawyer, labour organiser, community leader or technology advocate etc. may enter the BHR agenda through different pathways, while often confronting interconnected questions of human rights, corporate responsibility and accountability. Connecting these diverse experiences creates a stronger and more diverse youth voice within the BHR ecosystem.

The *second* priority is to *make BHR knowledge more accessible and practical* tailored to youth language and experiences. Meaningful participation requires more than invitations to meetings; young people need to understand the architecture, identify relevant entry points and know how to use BHR frameworks and mechanisms in their own work. PAYA-BHR therefore focuses on practical learning around the UN Guiding Principles on Business and Human Rights (UNGPs), human rights and environmental due diligence, access to remedy, National Action Plans, international labour standards and the ILO MNE Declaration, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and other relevant regional and national mechanisms. The aim is not to turn every young person into a BHR specialist, but to make the architecture understandable, relevant and usable.

The *third* priority is to *move from knowledge to application and influence*. PAYA-BHR seeks to support young people to apply BHR approaches in research, advocacy, policy engagement, corporate engagement, monitoring, implementation and accountability. The goal is therefore not simply to increase young people's understanding of BHR terminology, but to enable them to connect BHR with the realities they are already addressing, identify where they can intervene, and use the available tools and spaces to influence decisions and processes affecting their communities and futures.

This approach also creates the foundation for longer-term capacity building through the proposed *African Youth BHR Academy,* which PAYA-BHR envisions as a sustained learning and knowledge space to support young Africans to deepen their understanding, strengthen practical skills and remain connected to opportunities for engagement across the continent.

What progress is emerging?

Emerging progress can be seen in the growing recognition of young people as key stakeholders and actors in the Business and Human Rights agenda, alongside increasing efforts to move towards the institutionalisation of youth participation in BHR processes. The youth discussions held during the 2nd East & Horn of Africa Business and Human Rights Dialogue in Nairobi reflected this shift, highlighting the need for stronger youth knowledge and capacity, more structured pathways for participation, stronger links between BHR education, universities and youth programmes, and greater youth engagement in processes such as National Action Plans (NAPs) and other accountability mechanisms *(PAYA-BHR, 2026)*.

Importantly, these discussions went beyond a call for more opportunities to attend BHR spaces. They pointed towards a broader ambition for youth participation to become an established and meaningful component of national, regional and continental BHR governance, rather than remaining occasional, consultative or confined to youth-specific spaces. This reflects a growing understanding that young people should be recognised not only as beneficiaries or stakeholders of BHR processes, but as contributors to agenda-setting, implementation, monitoring and accountability.

For PAYA-BHR, this emerging momentum creates an opportunity to build a Pan-African youth constituency that connects young people across sectors and countries, strengthens collective knowledge and positions, and enables more effective engagement with the institutions and processes shaping the BHR agenda. The direction of change is therefore clear: from recognition, to participation; from participation, to influence; and from temporary opportunities for engagement towards the institutionalisation of youth leadership in BHR.

What factors enable or constrain this progress?

Several factors can enable meaningful and sustained youth participation in the BHR agenda. Growing recognition of youth as key stakeholders, the increasing openness of BHR institutions and processes to youth engagement, and the emergence of youth-led networks and platforms create important foundations for progress. Access to practical knowledge, mentorship, cross-sectoral networks and opportunities to engage directly with policymakers, businesses and accountability institutions can further strengthen young people's ability to move from interest to meaningful participation and influence. Equally important is the willingness of governments, businesses, international organisations and civil society to create institutional pathways through which youth participation can be sustained and connected to decision-making, rather than relying on one-off consultations or events.

At the same time, significant constraints remain. Limited understanding of BHR frameworks and mechanisms, the technical and specialised nature of the field, limited access to policy and decision-making spaces, inadequate financial and institutional support, and fragmented youth engagement can prevent young people from turning their existing leadership into sustained influence. Participation can also be concentrated among a small group of already-connected young professionals, leaving grassroots, community-based and less-resourced youth underrepresented. Without deliberate efforts to address these barriers, the growing recognition of youth may risk remaining symbolic rather than transformative.

Addressing these constraints therefore requires more than increasing the number of youth-focused activities. It requires sustained investment in youth capacity, stronger networks and knowledge-sharing, accessible entry points into BHR processes, and institutional mechanisms that give youth participation continuity and influence. This is where youth-led platforms such as PAYA-BHR can play an important bridging role: connecting diverse young Africans with the BHR ecosystem while helping institutions move from inviting youth into existing spaces towards embedding youth participation within the structures and processes through which the agenda is shaped.

What should we do differently?

The experience suggests that the next phase of youth engagement in BHR must move deliberately from consultation to meaningful participation, and from participation to influence. This requires a shift across the BHR ecosystem, with youth participation recognised not as an additional or occasional activity, but as part of building effective, inclusive and forward-looking BHR governance.

Governments and BHR institutions

Governments and BHR institutions should establish structured, sustained and safe mechanisms through which young people can contribute to National Action Plans, policy development, implementation, monitoring and accountability processes. Youth participation should be embedded within the core architecture of BHR governance, with clear pathways to contribute to agenda-setting and decision-making. These mechanisms should also protect young people from intimidation, threats and reprisals, particularly grassroots activists, community organisers and human rights and environmental defenders working on the ground. Governments and relevant institutions should further invest in accessible BHR and digital literacy, data access and appropriate tools that enable young people to document impacts, generate evidence and engage effectively with accountability mechanisms.

Businesses and investors

Businesses and investors should move beyond viewing young people primarily as stakeholders to be consulted and recognise them as partners in responsible business conduct and accountability. This includes creating meaningful opportunities, particularly for young people from affected communities, to contribute to stakeholder engagement, human rights and environmental due diligence, monitoring and accountability processes. They should also promote and invest in young people's skills, innovation and digital capacities to develop tools and strategies that can strengthen community monitoring, document business-related impacts and advance corporate accountability. Young people's knowledge of local realities and emerging risks should be recognised as an important resource for identifying impacts and developing more responsive solutions.

Development partners, universities and civil society

Development partners, universities and civil society should invest in long-term youth capacity, networks and institutional infrastructure, rather than limiting support to individual events or consultations. This includes accessible BHR education, mentorship, research, knowledge production, digital skills, networking and practical opportunities for engagement, while connecting BHR learning with the priorities young Africans are already advancing under Agenda 2063 and the 2030 Agenda. Support should also reach grassroots and less-connected youth who are often closest to business-related human rights impacts but least able to access formal BHR spaces.

Young people and youth-led organisations

Young people and youth-led organisations should continue building connections across sectors and countries, documenting evidence from their communities, developing collective positions and engaging existing BHR mechanisms. They can also create new spaces, partnerships and innovative approaches to monitoring and accountability, using technology, research and community-led initiatives to strengthen their collective voice and influence.

Ultimately, the question should no longer be whether young people have been invited to participate, but whether they have t*he knowledge, space, resources, safety and institutional pathways to* influence outcomes. This is the shift required to move from youth participation as an event or consultation towards youth participation as an established feature of BHR governance and to enable young Africans to contribute not only to the implementation of the agenda, but to its development and future direction.

Building the infrastructure for the next generation

This is where PAYA-BHR's longer-term ambition to establish the African Youth BHR Academy becomes particularly important. The Academy is envisioned not simply as a training programme, but as a Pan-African youth learning and knowledge platform designed to address one of the central constraints identified above: the lack of sustained access to BHR knowledge, practical tools, and pathways for engagement. Its approach will remain responsive to the diversity of young people's work. A young person working on climate justice needs different entry points from a young entrepreneur, lawyer, researcher, labour organiser, technology advocate, or peace and security practitioner. The objective is therefore not to teach BHR as a one-size-fits-all subject, but to connect BHR learning to the issues young people are already working on and help them use that knowledge to strengthen their own work.

The Academy can provide a longer-term infrastructure for learning, youth-led research, policy analysis, practical toolkits, peer exchange, mentorship, and collective positions. In doing so, it will help young people move from learning about BHR, to applying BHR, to engaging with BHR processes, and ultimately to influencing the agenda itself.

Conclusion

The future of Business and Human Rights in Africa cannot be shaped effectively without the generation already living, working and organising within the continent's changing economic landscape. The question is therefore not whether young people should participate in BHR. They are already part of the realities that BHR seeks to address. The question is whether African institutions, businesses, development partners and BHR actors will create the conditions for young people to participate with the knowledge, confidence, networks and influence needed to help shape decisions. PAYA-BHR seeks to contribute to this shift: from participation to influence, from fragmented engagement to a connected Pan-African youth constituency, and from one-off opportunities to sustained and institutionalised pathways for youth leadership. This includes building accessible learning and knowledge opportunities, strengthening connections across sectors and countries, and developing longer-term capacity through initiatives such as the proposed African Youth BHR Academy.

Ultimately, the ambition is a BHR ecosystem in which young Africans are not simply invited to existing spaces, but are equipped, connected and recognised as actors capable of shaping the policies, business practices and accountability mechanisms that will define the future of human-rights-centred development across Africa.

About Pan-African Youth Alliance on Business and Human Rights (PAYA-BHR)

Pan-African Youth Alliance for Business and Human Rights (PAYA-BHR) is a youth-led network dedicated to strengthening meaningful youth participation in the business and human rights agenda across Africa. It works to amplify young people's voices in policy development, responsible business conduct and human rights governance, while promoting business and human rights education, advocacy and leadership. Through partnerships with regional and international stakeholders, PAYA-BHR supports the inclusion of youth perspectives in initiatives related to corporate accountability, access to remedy and sustainable development.

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Beyond Compliance: Making Human Rights Due Diligence a Business Imperative

By Judy Njino, Executive Director, Global Compact Network Kenya

Context

Across East and the Horn of Africa, the conversation on responsible business conduct is changing. Human rights are no longer viewed only as a matter of corporate responsibility or regulatory compliance. They are increasingly connected to how companies manage risk, strengthen supply-chain resilience, access markets, attract investment, build stakeholder trust and create long-term value. This shift was evident during the East & Horn of Africa Business and Human Rights Dialogue held in Nairobi on 10–11 June 2026. Governments, businesses, civil society organisations, national human rights institutions, development partners and community representatives came together around a shared challenge: moving from policy commitments to practical implementation of the UN Guiding Principles on Business and Human Rights (UNGPs).

For Global Compact Network Kenya, this transition is central to our mandate. Guided by the UN Global Compact Strategy 2026–2030, we are strengthening our focus on advancing the business case for sustainability by demonstrating that responsible business is not only the right thing to do, but also a strategic imperative.

Our role is therefore to help companies understand that respecting human rights and creating business value are mutually reinforcing. When human rights due diligence is embedded in governance, risk management and operational decision-making, it can help businesses anticipate disruption, protect workers, strengthen supplier relationships, maintain community trust and respond credibly to evolving market expectations.

Challenge

Despite growing awareness, a gap remains between corporate commitment and implementation. Many companies have adopted policies, supplier codes, sustainability commitments or certification systems. These are important foundations, but they do not always translate into a continuous process for identifying and addressing the company's most significant impacts on people.

Human rights responsibilities are often fragmented across sustainability, human resources, legal, procurement, risk, compliance and community-relations functions. Without clear leadership, defined ownership and coordinated implementation, human rights can remain peripheral to the decisions that shape business operations. The changing regulatory and market environment adds another layer of complexity. Companies operating in regional and global value chains are facing increased expectations from customers, investors and regulators to demonstrate how they identify, prevent, mitigate and account for adverse human rights impacts.

For many businesses, particularly small and medium-sized enterprises and suppliers, these expectations appear costly, technical or disconnected from immediate business priorities. This perception results in a compliance-driven response focused on producing documents, passing audits or satisfying customer requests. The strategic challenge is to reposition human rights due diligence as a management tool that enables companies to understand their operating environment, make better decisions and protect both people and long-term business performance.

Actions

Global Compact Network Kenya is addressing this challenge through a practical company-support model that combines structured learning, technical tools, peer exchange and leadership engagement. A central platform is the UN Global Compact Business & Human Rights Accelerator, which supports companies to establish an ongoing human rights due diligence process aligned with the UNGPs. Through the Accelerator, companies assess their existing systems, map their value chains, identify and prioritise salient human rights impacts, develop action plans, engage stakeholders and strengthen their approaches to grievance mechanisms and remedy.

We have adapted this practical learning approach across our wider Business and Human Rights programming, including sector-based capacity-building and peer-learning workshops. This allows us to meet companies at different stages of maturity while maintaining a consistent focus on assessment, prioritisation, action and accountability.

The intention is not to provide companies with another checklist. It is to help them ask better strategic and operational questions:

- Where are people most at risk across our operations and value chain?
- How could these risks affect business continuity, workforce stability, market access or stakeholder trust?
- Which functions have the authority and resources to respond?
- Are affected stakeholders involved in shaping the response?
- How will we know whether our actions have improved outcomes for people?

Leadership engagement is critical to this process. Human rights due diligence cannot be delegated to one sustainability or human rights focal point without authority, resources or access to decision-makers. It requires senior-level oversight and coordinated action across functions such as procurement, human resources, operations, risk, legal and finance. Peer learning also enables companies to move beyond theory. By learning from businesses operating in similar sectors and contexts, companies examine practical solutions, discuss implementation barriers honestly and identify approaches that are both rights-centred and commercially realistic.

Progress

We are beginning to see a change in how companies engage with the human rights agenda. The conversation is gradually shifting from whether a company has a policy, audit or certification to whether its systems are capable of identifying the most serious risks to people and influencing business decisions. Companies are increasingly examining how human rights responsibilities are governed internally, how risks are prioritised and how findings can be translated into actions, responsibilities, timelines and indicators. There is also growing recognition that effective grievance mechanisms and meaningful stakeholder engagement are not merely procedural requirements. They can provide companies with valuable information about emerging risks before they escalate into operational disruption, conflict, legal exposure or reputational damage.

The strongest indication of progress is the growing understanding that human rights due diligence is not a one-off assessment. It is an ongoing process that must respond to changes in business relationships, operating environments and the experiences of workers and communities. This shift in organisational thinking is an important foundation. However, meaningful progress must ultimately be measured by whether company action improves outcomes for affected people while strengthening the resilience and sustainability of the business.

Lessons

Several strategic lessons are emerging from our work. First, the business case must be made explicit. Human rights due diligence gains traction when it is connected to the priorities that leaders already manage, including operational risk, productivity, talent retention, supply-chain security, market access, investor confidence and social licence to operate. Second, leadership commitment must translate into governance and accountability. Senior leaders should establish clear ownership, allocate resources and regularly review whether human rights actions are producing the intended results. Third, businesses need practical pathways, not only principles. Companies are more likely to act when global standards are translated into clear steps, relevant tools and examples that reflect their sectors, size and operating realities. Fourth, stakeholder engagement strengthens business intelligence. Workers, communities and other rights holders often see risks before they become visible through formal reporting systems. Listening to them enables earlier and more informed action. Finally, no single company can address every systemic challenge alone. Business associations, governments, civil society, national human rights institutions and development partners all have a role in creating the knowledge, incentives and enabling environment required for responsible business conduct.

Our invitation to business leaders is to move beyond asking what human rights due diligence will cost and consider what failure to act could cost the business, its workers, its communities and its long-term competitiveness. Responsible business conduct is not separate from business success but is increasingly one of the conditions for achieving it.

About Global Compact Network Kenya (GCNK)

Global Compact Network Kenya is the Country Network of the United Nations Global Compact that is working to mobilize business to transform business ambition into action at the scale the world demands. As a special initiative of the UN Secretary-General, the UN Global Compact is a call to companies worldwide to align their operations and strategies with Ten Principles in the areas of human rights, labour, environment and anti-corruption. With more than 25,000 participants and a presence in over 100 countries through 5 Regional Hubs and more than 70 Country Networks and expansion territories, the UN Global Compact is the world's largest corporate sustainability initiative.

Independent media, a proven key actor in ensuring local and indigenous communities affected by land-based development projects can access remedies.

By Witness Radio

Context

The global population now exceeds 8.1 billion, increasing pressure on land resources. This has intensified forced land evictions, especially in developing countries, where land is often seized for investment projects. Six years after the United Nations Human Rights Council endorsed the Guiding Principles on Business and Human Rights, Witness Radio recognized that these principles were not reaching or being understood by local and indigenous communities. Through diverse media strategies, Witness Radio has highlighted community challenges by exposing violations, amplifying victim voices, shaping public debate, supporting accountability and legal action, and advocating reforms to strengthen accountability mechanisms.

In industrialized societies, media serves as a key source of information for project-host communities, particularly in rural areas. However, its potential is underutilized, as reporting on corporate abuses often conflicts with commercial, political, and structural interests.

East Africa, a resource-rich region, attracts significant investment, particularly in extractive and energy sectors. While these investments support economic growth, they often harm the environment and human rights. Cases of illegal land acquisitions leave affected communities with limited remedies. Thousands have been forcibly removed from long-held homes, with nearly two land eviction cases recorded every three days during the specified period.

Challenges

Access to legal and effective remedies for business-related human rights abuses is hindered by systemic, financial, and procedural barriers, often due to limited community involvement and insufficient information. In many developing countries, citizens prefer public courts for justice, as seen in Tanzania, Kenya, and Uganda. While public bodies like mining commissions can address extractive industry disputes, non-state mechanisms such as company grievance procedures are often unknown, unavailable, or underutilized. Communities often lack access to remedy information due to power imbalances, complex language, hidden information, poorly promoted company systems, and short deadlines.

The media's role in responsible business conduct is often limited to reporting after harm has occurred, treating abuses as isolated events. This approach undermines the multisectoral collaboration needed to address these issues and weakens trust and relationships with corporations on human rights matters.

Actions

To address these challenges, it is essential to build genuine partnerships with independent media, investing in investigative reporting, open dialogue, and ongoing monitoring. This approach can help transform corporate culture from within, rather than relying solely on external criticism.

Collaboratively set a consistent, pro-human rights agenda by strengthening the capacity of reporters, editors, and media institutions. Mainstream responsible business conduct within editorial policies to move beyond episodic coverage. Develop accessible content in partnership with communities and disseminate it through media outlets and journalists using sensitive reporting. Promote customary conflict resolution mechanisms as viable alternatives to formal systems, as traditional practices are often more accessible and accepted by local communities.

Communities must be informed about their rights and available redress mechanisms to access justice. Strengthening capacity-building efforts will help individuals and communities understand and use remedies effectively. Leverage media to raise awareness and advocate for sub-regional, regional, and international mechanisms, ensuring access to effective legal remedies and combating human rights abuses.

Progress

Witness Radio has compiled data on forced land evictions through a dedicated portal, offering real-time information on development projects taking place in Uganda, implementers, financiers, land sizes, affected families, and targeted community defenders. Community empowerment and amplifying victims' voices through meetings and radio dialogues have mobilized affected communities, provided legal literacy on land rights, and increased understanding of available remedies. Media monitoring, documentation, and investigative reporting have gathered critical evidence, supporting over 250,000 families in their efforts for accountability.

Witness Radio has helped victim communities access remedies and influence reviews of company and financier accountability mechanisms. We have supported over 8,000 families in filing lawsuits and complaints, with about 35% resolving disputes through mediations. These efforts have improved grievance mechanisms, including new sexual and gender policies.

Lessons

A key lesson is that a multisectoral approach to responsible business conduct is needed at all levels, with each stakeholder playing its part. Independent media play an especially important role in sharing real-time experiences of local and indigenous communities affected by land-based investments. This way, financiers, governments, companies, and others will receive regular prompts to provide quicker solutions.

The three of the media's traditional roles – informing audiences, acting as watchdogs, and campaigning on social issues – are especially relevant in the context of increasing community awareness of holding duty-bearers and different economic actors to account. The independence of the media is paramount if they are to to perform their roles effectively. As such, dialogues that bridge-build between different actors is key in media leaning approaches for meaningful spaces that build trust and accountability.

A multisectoral approach to responsible business conduct is needed at all levels, with each stakeholder playing its part. Independent media play an especially important role in sharing real-time experiences of local and indigenous communities affected by land-based investments. This way, financiers, governments, companies, and others will receive regular prompts to provide quicker solutions.

About Witness Radio

Witness Radio Organisation (witnessradio.org) is a non partisan and not-for-profit registered network of human rights investigative journalists, lawyers, social workers using legal aid support and media leaning approaches with a main focus to promote and protect economic, social and cultural rights and development in Uganda.

Started in 2016 the organization provides legal representation and support to poor and vulnerable and land grab affected communities and uses Information Communication technology (ICT) platforms as its primary mediums to achieve its goals.



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