

# ENGAGING PEOPLE WITH LIVED EXPERIENCE

## A BRIEF FOR INVESTORS





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# Executive Summary

Institutional investors are increasingly exposed to systemic human rights risks through their portfolios – from supply chain exploitation to modern slavery. These risks carry significant legal, financial and reputational implications that no finance organization can afford to ignore. While many are adopting double materiality approaches and conducting human rights due diligence, they are often doing so with limited visibility and incomplete data.

Much of the human rights data currently available on business supply chains is fragmented, high-level, or detached from reality. As a result, risk assessments frequently fail to address the root causes of harm or meaningfully reduce institutional exposure. The people who have directly experienced exploitation, abuse and systemic neglect possess invaluable, grounded experience. Their lived experience offers insights into the hidden corners of supply chains, covert financial flows, and the breakdown of safeguards – knowledge that cannot be replicated through traditional data sources.

By actively engaging people with lived experience – listening to how they perceive risk, identify vulnerabilities, and understand where systems fail or succeed – financial institutions can gain insight that strengthens both human rights outcomes and financial resilience. This is not just about compliance; it's about robustness. Assets, portfolios and projects exposed to modern slavery and other human rights risks are better protected when informed by those who have faced these threats firsthand.

In the context of rapid energy transition and accelerating capital flows, failing to draw on this ground-level expertise is a missed strategic

opportunity. For financial institutions committed to respecting human rights, integrating lived experience into risk management is not optional – it is essential.

Many international, national and local actors – including worker unions, labour organizations, civil society organizations, industry networks, and lived experience-led groups – are ready to facilitate ethical engagements between financial institutions and people with lived experience. Data scientists and researchers are also developing AI-driven tools and solutions to enable efficient, scalable and safe forms of collaboration. Financial institutions can further leverage investor coalitions and collaborative initiatives to optimize resources, boost engagement outcomes, and turn engagements with people with lived experience into an industry-wide lever for change.

Financial institutions do not need to wait. They can start small – building relationships, governance structures and systems that enable ongoing, meaningful engagement over time.

This brief provides financial institutions with tailored insights, accessible resources and practical guidance on why, how and when to engage people with lived experience of human rights abuses such as modern slavery across the investment cycle. It includes real-world examples from industry peers and recommends concrete short, medium and long-term actions that institutions can take – regardless of their starting point – to embed lived experience into their human rights strategies and decision-making processes.





# Introduction

## Challenge

An estimated 50 million people worldwide are in situations of modern slavery, including 28 million subjected to forced labour.<sup>1</sup> Climate-induced displacement, violent conflict, global insecurity, and the accelerating energy transition are amplifying human rights abuses within global supply chains.

For instance, demand for energy transition minerals is projected to rise by up to 60 percent by 2060,<sup>2</sup> intensifying extraction in regions where mineral reserves are concentrated. In many of these areas, weak regulatory and judicial frameworks, limited law enforcement, shrinking civic space, and inadequate protections for vulnerable and marginalized groups heighten the likelihood of human rights abuses.<sup>3</sup>

These dynamics expose investment portfolios to material reputational, legal and financial risks, especially as governments around the world adopt mandatory human rights due diligence (HRDD) laws that establish corporate liability for human rights abuses occurring within supply chains. Forced labour alone generates an estimated \$236 billion in illegal profits each year, distorting markets and disadvantaging legitimate businesses.<sup>4</sup>

At the same time, financial institutions face growing data constraints in assessing and managing human rights due diligence across their portfolios. Limited funding for civil society organizations restricts access to reliable public data on corporate human rights performance, while inconsistent and opaque corporate reporting continues to hinder transparency. Environmental, social and governance (ESG) data providers rarely offer the

granular, timely and contextual data needed to identify and assess clients' and investees' human rights risks – particularly in conflict-affected and high-risk areas (CAHRAs).

This data gap undermines financial institutions' ability to meet both their fiduciary duties to deliver financial returns to beneficiaries and their responsibility to respect human rights, as outlined in international standards such as the UN Guiding Principles on Business and Human Rights. Without bridging this gap, the potential for investors to address modern slavery effectively remains severely constrained.

## Solution

Financial institutions, as powerful economic actors, possess significant investor leverage to prevent and mitigate human rights abuses in global supply chains, especially where the likelihood and severity of such abuses are high. By engaging directly with affected rights-holders and requiring clients and investees to do the same, they can help ensure business operations respect the human rights of workers and communities. Crucially, this includes ensuring that the energy transition does not come at the expense of vulnerable and marginalized groups. People with lived experience of human rights abuses in business supply chains are a vital source of on-the-ground data and solutions. Their insights enable financial institutions to better identify, prevent and mitigate human rights risks – often before they materialize or escalate – thereby strengthening portfolio resistance and reducing overall risk exposure.

Institutions that have engaged with people with lived experience report significant benefits: deeper, context-specific understanding of risks

associated with clients and investees;<sup>5</sup> sharper due diligence questions; and more credible corporate dialogues.<sup>6</sup> They can help financial institutions increase the legitimacy of concerns raised with companies<sup>7</sup> and support improved design of operational-level grievance and remediation mechanisms.<sup>8</sup> At the project or asset level, such engagements can also reduce the risk of social unrest or conflict between companies and local communities<sup>9</sup> – while failure to do so

can jeopardize a company's social licence to operate<sup>10</sup> and increase financial and reputational exposure.

For people with lived experience, meaningful engagement brings tangible and restorative tangible benefits, including better working conditions, remediation of harm,<sup>11</sup> skills development,<sup>12</sup> and a renewed sense of agency and healing through the reclaiming of their voice.<sup>13</sup>

## How this brief can help you

Engagement with people with lived experience of business-related human rights abuses remains at an early stage across industries.<sup>14</sup> This is largely due to the absence of tailored guidance and a clearly articulated business case.

This brief helps close that gap. It provides financial institutions with practical guidance, real-world examples, and actionable insights on both the why and the how of integrating lived-experience perspectives into the design, improvement and operation of human rights due diligence and operational-level grievance mechanisms – irrespective of their current level of practice or starting point.

In particular, the brief focuses on engagement with people who have experienced modern slavery – a practice that can help financial institutions more effectively identify, prevent and mitigate modern slavery and related risks within their portfolios. This is especially relevant in CAHRAs, where the likelihood and severity of such risks are greatest. This brief is aligned with leading international business and human rights standards, including:

- the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#);
- the International Labour Organization's [\(ILO\) Tripartite Declaration of Principles Concerning Multinational Enterprises](#) and Social Policy (MNE Declaration); and
- the Organisation for Economic Co-operation and Development [\(OECD\) Guidelines for Multinational Enterprises \(MNEs\) on Responsible Business Conduct](#).

It is grounded in existing research and evidence, and informed by data gathered specifically for this project through interviews with diverse stakeholders – financial institutions, real-economy businesses, civil society organizations, trade unions and people with lived experience of modern slavery from multiple contexts (see appendix 3).



## Who this brief is for

This brief is designed for institutional investors – including banks, pension funds, investment managers, insurance companies, and development finance institutions – that aim to manage systemic investment risks and strengthen portfolio-wide human rights due diligence. Collectively, these entities are referred to as financial institutions. By engaging meaningfully with people with lived experience, these financial institutions can:

- identify and address red-flag indicators earlier;
- improve grievance-response pathways; and
- align their practices with national and international modern-slavery policies focused on prevention and protection, including human rights due diligence laws, forced labour import bans, and survivor-centred remedies.

Within financial institutions, the brief is primarily relevant to asset, project and portfolio investment managers, underwriters, investment officers and other investment and lending professionals involved in investment decision-making and human rights due diligence – such as responsible investment, social impact, ESG and sustainability leads.

Personnel working on human rights in other areas – such as within service provision or procurement functions – may also find the guidance applicable as they explore rights-holder engagement in their operations.

This brief is relevant to financial institutions with investment portfolios spanning diverse asset classes and industries. It may be of particular interest to those with exposures in CAHRAs, especially in energy transition projects and the electric vehicle supply chain. To illustrate these dynamics, the brief features a case study on the extractive sector in the Democratic Republic of the Congo.

## Who else can benefit from this brief

While this brief is primarily designed for financial institutions, its practical guidance on engaging with people with lived experience of human rights abuses – including modern slavery – within human rights due diligence and operational-level grievance mechanisms is also relevant to a broad range of other stakeholders.

- **Standard-setters and taskforces developing global disclosure frameworks:** to shape the design of sustainability reporting standards, human rights due diligence and modern slavery statements, and governance and risk disclosures required by securities regulators and stock-exchange listing rules. This brief can support the integration of survivor-informed indicators and metrics into emerging taxonomies and frameworks.
- **Governments:** to guide the development and implementation of legislation and policy tools related to human rights due diligence, modern slavery prevention, public procurement, forced labour import ban, and ESG-linked tax incentives or penalties, ensuring these measures promote responsible business conduct and disclosure.
- **Government in the Democratic Republic of the Congo:** to inform policies and programmes on artisanal mining formalization, community profit redistribution from the mining sector, and facilitation of engagement between local stakeholders and financial institutions.
- **Civil society in the Democratic Republic of the Congo:** to support local initiatives for mining workers and create opportunities for engagement between people with lived experience and financial institutions.
- **National financial regulators and stock exchanges:** to inform sustainability and

modern-slavery-related disclosure and reporting requirements for listed and supervised entities, align guidance on due diligence expectations, and embed survivor-informed risk indicators into listing-rule compliance, assurance and supervisory practices.

- **Data providers:** to collaborate with people with lived experience in generating accurate, disaggregated and context-specific data on modern slavery, and to co-design data collection, scoring and reporting systems that better capture survivor-centred risk indicators relevant to finance sector decision-making and disclosures.
- **Civil society, trade unions, National Human Rights Institutions, and media:** to enhance collaboration with financial institutions, clients and investees in monitoring their human rights performance, and to strengthen advocacy for domestic policy and legal frameworks on human rights due diligence and modern slavery that include meaningful engagement with lived experience.
- **Lived experience leadership:** to support meaningful participation as advisers, trainers and co-designers of human rights due-diligence processes, grievance mechanisms, and survivor-centred remediation strategies – bringing first-hand insights that improve risk assessments, strengthen remedy pathways, and enhance the credibility of financial institutions and corporate reporting.
- **Businesses in non-financial industries and their value chains:** to inform their own engagement with people with lived experience in their human rights due diligence and operational-level grievance mechanisms, and in reporting to financial institutions – while recognizing that industry-specific contexts may require tailored approaches.



## SECTION 1

# ENGAGING PEOPLE WITH LIVED EXPERIENCE

### WHO are people with lived experience?

For the purposes of this brief, “people with lived experience” refers to rights-holders – individuals or collectives – whose human rights have been negatively affected by business operations, including through business supply chains.

People with lived experience of human rights abuses in business supply chains are not a homogeneous group. They may be at different stages of their recovery journey. The lived experience of those who have exited situations of modern slavery encompasses not only the abusive event itself but also the long-term process of recovery and reintegration, including their interactions with systems such as grievance mechanisms, social protection services, and labour markets.

Financial institutions – like all actors – should avoid imposing labels or definitions on people with lived experience. Individuals may have different preferences for self-identification, and these preferences may evolve over time as their relationship to their experience changes:

- Some people may self-identify as victims, a term often used in legal contexts, particularly in relation to criminal accountability or access to remedy;
- Others may prefer survivors, a term commonly used within the UN system and by civil society organizations to highlight agency and empowerment; and
- Some may reject labels altogether, viewing them as external constructs that reduce their full identity to a single experience.

In recent years, some individuals have adopted the self-identifier “survivor leaders”, using their experiences to assist others in semi-professional or professional roles. Survivor leaders typically

have both experiential knowledge and acquired expertise – through education, training, or community organizing – and may hold leadership roles in lived experience-led or other civil society organizations. In practice, survivor leadership combines community credibility, systems insight, and the ability to bridge different worlds.

In this brief, the term “people with lived experience” is used because it is considered more neutral, inclusive and adaptable across regions and contexts.<sup>15</sup>

**Guidance Point 1.** When engaging with people with lived experience, respect and use the terms they prefer for self-identification – even if those terms are not yet recognized in international normative frameworks, or regional or national legislation.

### WHY engage people with lived experience?

#### Lived experience expertise

People with lived experience of modern slavery are increasingly recognized as experts by experience. Their knowledge – grounded in direct encounters with exploitation and its aftermath – offers insights that are essential for designing effective solutions across multiple sectors, including health, social protection, justice and security, where academic or professional expertise alone often falls short.<sup>16</sup>

For financial institutions, engaging with these experts and integrating their perspectives into investment processes directly strengthens risk management, due diligence and disclosure practices. Such collaboration sharpens the ability to anticipate systemic risks within investment portfolios and enables early identification of



interconnected issues such as labour abuse, governance fragility, and market volatility, supporting better alignment with fiduciary duties.

**“[Engagement with people with lived experience] is important to inform better questions to ask companies and spot warning signs early.”**

*A finance organization interviewed for this project*

Engagement with lived experience experts is also critical to uncovering the root causes of severe human rights abuses like modern slavery<sup>17</sup> and untangling the complex socio-political and market systems that sustain them.<sup>18</sup> This depth of understanding enables more informed, resilient and responsible investment decision-making.

**“We are the third eye to see what others cannot see.”**

*A lived experience leader interviewed for this project*

## Financial materiality

Human rights abuses, including modern slavery, can generate material financial risks – through litigation, regulatory fines, reputational damage, and operational disruption – all of which erode long-term portfolio value.

Engaging with people with lived experience provides financial institutions with granular, real-time intelligence, particularly in CAHRAs. This helps identify early warning signs of adverse human rights impacts that traditional due diligence tools, such as audits, may overlook. It also facilitates ongoing dialogue with affected communities, supporting preventive action, securing a social license to operate, and tracking effectiveness.

Even companies with clean audit reports or high ESG ratings can face human rights scandals. Insights from people with lived experience enable financial institutions to understand on-the-ground realities, assess nuanced risks among clients and investees, and safeguard financial returns.

**“[Lived experience] would enable us to better understand issues on the ground, really understand where things are going wrong, and obtain a level of specificity that data providers do not have.”**

*Financial institution interviewed for this project*

Institutions that engage with lived experience report a stronger capacity to assess and account for the financial materiality of human rights impacts – both on their clients and investees and within their own operations.<sup>19</sup> This leads to enhanced financial performance and more effective management of systemic risks.

This approach aligns with emerging regulatory frameworks. The European Sustainability Reporting Standards (ESRS)<sup>20</sup> explicitly state that engagement with affected communities results in more accurate double materiality reporting, including financial materiality. Likewise, the European Union Corporate Sustainability Reporting Directive (CSRD) recognizes that engagement with affected stakeholders is essential for identifying and assessing potentially material impacts.

## Compliance with standards

Engaging with people with lived experience is integral to operationalizing international human rights standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Multinational Enterprises Declaration. Such engagement provides the ground-level

intelligence needed for effective human rights due diligence to identify and assess adverse impacts accurately and to design effective remediation measures.

It also strengthens compliance with leading voluntary reporting frameworks such as the UN Principles for Responsible Investment, the Global Reporting Initiative (GRI) Standards, and the International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards, ensuring disclosures on modern slavery and broader human rights risks are credible, evidence-based and verifiable.

## Compliance with legally binding regimes

Globally, governments are introducing stricter human rights and modern slavery laws that impose mandatory due diligence and corporate accountability. These legal requirements are expanding beyond developed economies – such as Australia, Canada, the European Union, France, Germany, Norway, the United Kingdom, and the United States – to include emerging markets like Brazil, Colombia, Indonesia, Kenya, Mexico, South Korea and Thailand.

Proactively engaging with people with lived experience enables financial institutions to anticipate and meet these obligations, avoiding regulatory penalties and corporate liability. (See appendix 4 for a non-exhaustive list of relevant standards and laws).

Engagement can also protect financial institutions from the growing wave of corporate human rights litigation, often led by Indigenous Peoples and communities. Such lawsuits carry significant financial and operational risks that can impact portfolio value. For instance, the Business and Human Rights Resource Centre’s “Just Transition Litigation Tracker” has identified 95 lawsuits related to transition mineral mining and renewable energy that have the potential to temporarily or

permanently halt major projects.<sup>21</sup>

By incorporating lived experience insights, financial institutions gain an early warning system, allowing them to identify and address grievances before they escalate into costly disputes or project shutdowns.

## Humanization of adverse human rights impacts

Engaging with people with lived experience transforms abstract human rights concepts such as “modern slavery” into tangible human realities – creating a direct human connection between finance professionals and those impacted.

**“Hearing a story of a survivor, having met with a survivor, humanizes us.”**

*A finance organization interviewed for this project*

This engagement also yields mutual benefits. People with lived experience gain opportunities for skills development, empowerment, and financial stability, while financial institutions receive more reliable, context-specific intelligence. This creates a virtuous cycle: empowered experts contribute to more resilient, inclusive communities, which in turn de-risks value chains and reduces investment risk.

**“Engaging with businesses and financial institutions allows us to bring the human element back into the modern slavery discussions.”**

*A lived experience leader interviewed for this project*

Ultimately, investing in meaningful engagement with people with lived experience translates into reliable, on-the-ground intelligence and long-term portfolio sustainability.



**Box 2: Examples of stakeholder engagements with people with lived experience and their impact relevant to financial institutions.**

Across the world, governments, civil society organizations, multilateral organizations and academic institutions are engaging with people with lived experience of modern slavery and related abuses. These collaborations have yielded measurable positive impacts across policy, programming and financial systems, including:

- **Improving public policy and programming**

Engagements with people with lived experience have enhanced the effectiveness of prevention initiatives, rehabilitation interventions, data collection mechanisms, outcomes for service-users, and confidence in organizational policy and practice.

Such initiatives consistently lead to greater credibility, higher engagement levels and self-referral rates, greater sustainability, and more robust solutions addressing root causes of exploitation.<sup>22</sup> In such contexts, lived experience-led projects have contributed to uncovering trafficking networks, tracing illicit financial flows, validating patterns of abuse, and facilitating arrests.

- **Strengthening capacities of financial institutions on modern slavery, money laundering, and trauma-informed approaches**

The Finance Against Slavery and Trafficking (FAST) Survivor Inclusion Initiative has strengthened the capacity of over a dozen banks in Canada, the United Kingdom and the United States to engage with survivors through trauma-informed and inclusive practices. These efforts have led to improved client-retention policies, service design and delivery.

- **Influencing public policymaking through formal structures that feed directly into government processes**

United Kingdom: A Lived Experience Advisory Panel was established in 2025 to inform the country's National Baseline Assessment of the implementation of the United Nations Guiding Principles. The United Kingdom's Independent Antislavery Commissioners' Strategic Plan 2024-2026 was also informed by people with lived experience.

Australia: The Government's Lived Experience Engagement Programme provides ongoing expert advice on modern slavery policy. In 2024, people with lived experience co-developed practical guidance for organizations on meaningful engagement strategies through the Modern Slavery Lived Experience Engagement and Empowerment Initiative.

United States: Since 2015, the Government's Advisory Council on Human Trafficking – composed of lived experience experts – has advised federal agencies on anti-trafficking policy. Many lived experience experts in the United States also contribute to public policy processes:

- Vanessa Bautista testified as an expert witness before the House of Representatives Judiciary Committee in 2023 to support the EARN IT Act, which seeks to hold technology companies accountable for preventing the distribution of child sexual abuse material online.
- Hollie Nadel, a lived experience expert, has advocated for the Trafficking Survivors Relief Act and Debt Bondage Repair Act, both designed to remove employment barriers for victims of human trafficking.

Canada, the United Kingdom, and the United States: Between 2019 and 2023, the FAST's Survivor Inclusion Initiative partnered with 14 banks and 39 survivor-support organizations to open 3,040 bank accounts for survivors of trafficking. The pilot introduced trauma-informed onboarding, flexible know-your-customer procedures and waived minimum balances – removing barriers to formal finance. Participating banks improved client-retention policies, built staff capacity on survivor-sensitive compliance, and expanded inclusion strategies while remaining compliant with Anti-Money Laundering and Countering the Financing of Terrorism laws and practices.

## WHAT is engagement with people with lived experience?

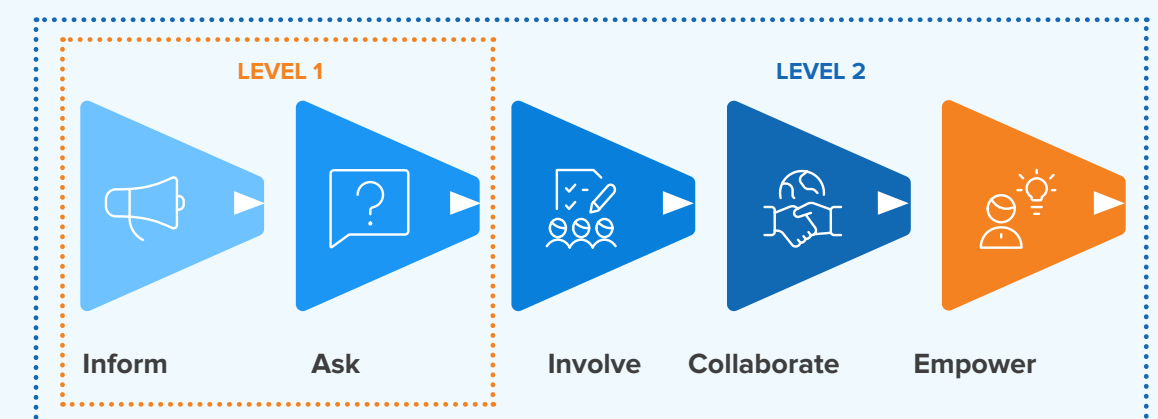
In the context of this brief, “engagement with people with lived experience” refers to the purposeful interaction and dialogue between financial institutions and people with lived experience of human rights abuses.<sup>23</sup>

Such engagement is not one-size-fits-all. It can take multiple forms across a five-type spectrum

of engagement: from informing and asking, to involving, collaborating and empowering.<sup>24</sup> These types of engagement operate at two distinct levels (see box 2).

At level 2, people with lived experience are engaged in professional or semi-professional capacities, with recognized expertise and a degree of decision-making power that extends beyond their personal experiences.

**Figure 1: Two-level framework of engagement with people with lived experience across a five-type spectrum.**





These approaches are not mutually exclusive, and no single level or type of engagement is inherently more meaningful than another. However, simply informing people of decisions (“Inform”), without also seeking their input (“Ask”), does not constitute meaningful engagement.

While direct engagement with people with lived experience is recommended, financial institutions that cannot do so directly may engage indirectly – for example, through representative organizations such as trade unions and civil society organizations that maintain trusted relationships with affected rights-holders.

**Guidance Point 2.** International normative frameworks and emerging human rights legislation require businesses to inform and consult with people with lived experience (Level 1). To maximize mutual benefits, financial institutions should progressively move up the spectrum – toward involving, collaborating with, and empowering people with lived experience (Level 2).

Box 2. Simplified description of each type of engagement on the spectrum

|         | Type of engagement | Simplified description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Level of decision making of people with lived experience | Examples of tools and mechanisms                                                                                                                                                                                                                                                                                                                                                                |
|---------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LEVEL 1 | Inform             | Inform people with lived experience of: <ul style="list-style-type: none"><li>Actual and potential adverse impacts to which the finance organization is linked;</li><li>How risks and impacts are identified;</li><li>What actions have been taken to address each actual and potential adverse impact;</li><li>How effective the actions have been;</li><li>The timeframe, objectives, resources and other relevant information for people with lived experience before undertaking engagements;</li><li>How the finance organization has acted on feedback from people with lived experience.</li></ul> | None                                                     | <ul style="list-style-type: none"><li>In-person meetings, online dialogues, and formal public reports;<sup>25</sup></li><li>Storyboards, cartoons, plays;</li><li>Local television, (community) radio, newspapers;</li><li>Social media;</li><li>Hotlines, chatbots, and two-way text messaging;</li><li>Community-based information points/signboards;</li><li>Community volunteers.</li></ul> |
|         | Ask                | Consult with people with lived experience about: <ul style="list-style-type: none"><li>The identification of actual and potential adverse human rights impacts to which the finance organization is linked;</li><li>The effectiveness of the finance organization’s mapping, identification and responses to risks and impacts;</li><li>Individual preferences of people with lived experience for the different types of engagements;</li><li>Individual feedback from people with lived experience in order to evaluate internal processes, including those with client/investees.</li></ul>            | Low                                                      | <ul style="list-style-type: none"><li>Meetings, hearings, or consultation proceedings<sup>26</sup> undertaken in collaboration with legitimate intermediaries;</li><li>Interviews, site visits, focus group discussions, interactive workshops, questionnaires or surveys, worker-voice technologies undertaken in collaboration with legitimate intermediaries.</li></ul>                      |

|         | Type of engagement | Simplified Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Level of decision making of people with lived experience | Examples of tools and mechanisms                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LEVEL 2 | Involve            | Involve people with lived experience in the development and implementation of corporate policies and processes such as: <ul style="list-style-type: none"><li>Training materials for staff and/or clients and investees;</li><li>Human rights impact assessments and operational-level grievance mechanisms;</li><li>Action plans to prevent and mitigate identified actual and potential adverse human rights impacts;</li><li>Effectiveness indicators to monitor implementation of the action plan;</li><li>Communications strategy for disclosing risks, while ensuring accessibility of communications for actual and potentially affected rights-holders.</li></ul>                                           | Medium-low                                               | <ul style="list-style-type: none"><li>Involving people with lived experience through professional or semi-professional roles in specific projects or activities to input or review policies and processes;</li><li>Hiring people with lived experience as expert consultants;</li><li>Involving people with lived experience in public or private events for storytelling and capacity-building of financial institutions and/or clients;</li><li>Involving individual lived experience leaders in investment agreements;</li><li>Involving lived-experience-led organizations through activity-based grants;</li><li>Strengthening the capacity of individual lived experience leaders and lived-experience-led organizations.</li></ul> |
|         | Collaborate        | Work together as peers to co-design and co-implement: <ul style="list-style-type: none"><li>Training materials and programmes for internal staff and/or clients and investees;</li><li>Corporate capacity-strengthening on compliance with contractual obligations and risk management, including for clients/investees through support visits, good practice tools, and peer-to-peer exchanges;</li><li>Policies and processes across different stages of human rights due diligence, including operational-level grievance mechanisms;</li><li>Internal audits, including of clients'/investees' human rights performance;</li><li>Actions to rally industry peers, governments and other stakeholders.</li></ul> | Medium-high                                              | <ul style="list-style-type: none"><li>Employing people with lived experience in roles within the finance organization as staff members, including at entry level, as part of existing committees, or in advisory boards;</li><li>Strengthening the technical capacity of new staff members with lived experience expertise;</li><li>Employing people with lived experience so the finance organization can receive lived experience-led training and capacity-building;</li><li>Building partnerships with lived-experience-led organizations to regularly collaborate across the human rights due diligence process.</li></ul>                                                                                                           |
|         | Empower            | Create leadership and decision-making opportunities for people with lived experience to: <ul style="list-style-type: none"><li>Lead, plan, design, implement and evaluate processes and mechanisms;</li><li>Take strategic corporate decision-making;</li><li>Advocate for and influence policy reforms.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                  | High                                                     | <ul style="list-style-type: none"><li>Employing people with lived experience expertise as staff members in decision-making positions, including department heads, senior management, directors, and executive/directive board levels;</li><li>Employing people with lived experience as leaders in monitoring and grievance mechanisms;</li><li>Supporting leadership development for new staff members with lived experience expertise.</li></ul>                                                                                                                                                                                                                                                                                        |



**Guidance Point 3.** When considering employing people with lived experience, follow existing guidance, ideally developed in collaboration with lived experience leadership such as the [BSR and the Global Business Coalition Against Human Trafficking Guidance](#).

To empower people with lived experience, financial institutions can fund global, regional, or context-specific development initiatives that focus on capacity-building and skills development. Such initiatives can enhance financial literacy, risk awareness, and understanding of portfolio-wide risk management – expanding the pool of

lived experience experts equipped to engage meaningfully across the investment cycle, particularly at Level 2 of engagement.

While people with lived experience are the primary beneficiaries of such funding, their impact is greatest when they are actively involved in the design and implementation phases. Financial institutions can achieve this by:

- Consulting people with lived experience during programme design (Level 1); and
- Employing alumni of previous training programmes in implementation roles (Level 2).

This approach ensures that capacity-building efforts are grounded in real-world expertise and responsive to the needs and priorities of the communities they aim to support.

### Industry peer practices 1

In the Democratic Republic of the Congo, the African Development Bank has supported capacity-building and livelihood diversification through the [Support Project for the Alternative Welfare of Children and Young People Involved in the Cobalt Supply Chain](#) (PABEA-Cobalt). This initiative invests in local infrastructure, community development projects in mining areas, and the reintegration of children into education.

## DEMOCRATIC REPUBLIC OF THE CONGO CASE STUDY:

### The role of financial institutions in capacity-building and alternative livelihoods in the energy transition

A major challenge in the mining sector of the Democratic Republic of the Congo is the lack of alternative livelihoods. Many people enter the extractive industry out of economic necessity rather than choice. Financial institutions can play a key role in financing alternative livelihoods and investing in local capacity-building.

**“Once you finish studying, you will work in mining [...] that is what the family says, there are no alternatives, there is no option to work in agriculture as before.”**

*A worker with lived experience interviewed for this project*

Workers, especially women, have expressed strong demand for support in developing safer, more sustainable alternative livelihoods that align with their skills and aspirations to pursue viable economic activities beyond the extractive industry. Common aspirations include transitioning from selling food in mines to establishing small-scale enterprises such as tailoring or sewing – opportunities that require targeted financial, technical and institutional support.

This presents a strategic opportunity for financial institutions. By engaging directly with people with lived experience of modern slavery in the Democratic Republic of the Congo, financial institutions can co-identify and fund high-impact alternative livelihood initiatives that reflect local priorities and have higher potential for sustainable success.

Local civil society has also identified the need to build community capacity to gather and use evidence to access judicial remedies. Initiatives like the collaboration between the University of Lubumbashi and local CSOs – which trains communities on evidence collection – represent a positive step forward, but sustained funding is needed to scale and institutionalize these efforts. In parallel, formalizing the artisanal mining industry remains an urgent priority. Key interventions include:

- Funding for technical training;
- Provision of personal protective equipment;
- Establishing systems for worker registration and issuing official identification cards;
- Expanding access to basic social protections, such as healthcare and housing.

Financial institutions can play a catalytic role by designing tailored financial products, such as health insurance schemes developed in partnership with insurers for artisanal miners. Such solutions can address fundamental well-being gaps and support broader sector formalization efforts.



## SECTION 2

# HOW TO ENGAGE WITH PEOPLE WITH LIVED EXPERIENCE

### Identify and prioritize lived experience expertise

When planning engagement with people with lived experience, financial institutions should identify and prioritize engagement with the specific expertise most relevant to their geographical, sectorial, contextual and experiential needs.

Using a risk-based mapping of actual and potentially affected rights-holders across portfolios, projects and/or assets – and informed by critical data gaps – financial institutions can determine which groups of people with lived experience are most relevant to engage.<sup>27</sup>

Priority should be given to high-risk sectors, activities and contexts, such as those in CAHRAs, where the risks are higher and data gaps are more significant. Engaging international and local experts, including civil society organizations and human rights institutions, can help ensure the mapping accurately identifies the right communities and stakeholder groups, based on the severity and likelihood of organizational risks. Financial institutions should also determine where there is a need for lived experience expertise lies within their operations – whether at the organizational, portfolio, asset and/or project level – as this will shape the engagement approach:

- **Systemic, sectoral, or geographical risks:** Collaborate with industry peers and other stakeholders active in the sector or region in engaging people with lived experience.
- **Project or asset-specific risks:** Engage people with lived experience in collaboration with clients or investees.

When direct access to certain geographies is limited, financial institutions may engage with diaspora communities of people with lived experiences. In such cases, the mapping should include the country or territory where

the human rights abuses occurred, as this contextual information is essential for accurately understanding risks and impacts in the investment chain.

**Guidance Point 4.** Ground all engagements with people with lived experience in risk-based mapping and the identification of critical data gaps at the organizational, portfolio, asset, or project level. Prioritize mapping and engagements efforts related to investments in CAHRAs.

### Access people with lived experience through intermediaries

Once relevant lived experience expertise is mapped, the next step is to gain access to individuals. A common challenge expressed by financial institutions is being far removed from the operational contexts where human rights risks materialize, making direct access difficult, particularly to vulnerable and marginalized individuals in CAHRAs.

Building trust is fundamental to overcoming this barrier. Individuals with lived experience are often familiar with the real economy businesses operating on the ground but may be unaware of the financial institutions funding those operations. As a result, financial institutions are advised against unsolicited, direct approaches to people with lived experience. Instead, they should access lived experience through organizations that are closer to the realities on the ground, have built trust with communities, and are more knowledgeable of local cultural contexts and dynamics. These include trade unions and worker councils, National Human Rights Institutions, local CSOs, grassroots networks – especially in contexts without worker unionization – lived experience-led organizations, and lived experience advisory panels.



**Guidance Point 5.** Financial institutions should not directly approach people with lived experience. To access people with lived experience in the operational contexts of their clients/investees, particularly in CAHRAs, financial institutions should map and approach intermediaries, including:

- **Worker representative bodies:** A first-step resource to map and identify worker representative bodies and identify which unions represent which groups of people is the [Global Unions website](#).
- **International and local CSOs:** A first-step resource to map and identify CSOs is the [Global Modern Slavery Directory](#), which maps organizations across the world that work on modern slavery.
- **Lived experience-led organizations and lived experience advisory panels:** A first-step resource to access lived experience-led organizations and lived experience advisory panels is the non-comprehensive list provided in appendix 6.

Access to people with lived experience often means navigating multiple layers of networks, from the global to the local. Financial organizations should first partner with an international CSO, multi-stakeholder initiative, or academic institution to gain access to their established local partners.

For example, some financial institutions have utilized platforms like Advance Initiative, which channels insights from its Technical Advisory Group – comprising CSOs and community representatives – to financial institutions. Others have been connected to local labour unions in industries like sugarcane in India through international organizations such as the International Labour Rights Forum.

In other cases, financial institutions may already have existing relationships with regional or local CSOs that work with or support people with lived experience, including those focused on financial and economic inclusion or anti-money laundering. Where these trusted relationships exist, financial institutions should seek to leverage them as a primary channel for access.

Financial institutions can also collectively approach local intermediaries and access people with lived experience through existing investor-led initiatives (box 3). This can facilitate the establishment of partnerships and more systemic lived experience engagements.

### Box 3: Examples of investor-led collaborative initiatives that facilitate engagements with CSOs, trade unions, and people with lived experience

#### Global Unions' Committee on Workers' Capital

Established in 1999, this initiative facilitates collaboration between global labour unions and asset owner board members. It promotes information sharing and coordinated action to influence asset managers and to hold portfolio clients/investees accountable. The network provides a vital platform, offering guidance and resources to help pension fund trustees and union representatives advance workers' interests within investment decision-making processes.

#### Survivor Inclusion Initiative

Launched in 2019 by [Finance Against Slavery and Trafficking \(FAST\)](#), this initiative focuses on financial inclusion. It brokers direct dialogue between banks and organizations that support people with lived experience of modern slavery. The goal is to help survivors access essential financial services, a critical step for their empowerment and integration into society.

#### UN Principles of Responsible Investment Advance Initiative

This initiative enhances investor capacity for human rights due diligence through its Technical Advisory Group. Comprised of leading experts from organizations such as ILO, OECD, and the Committee on Workers' Capital, the group provides strategic technical advice. A key function is supporting investors to meaningfully engage with people with lived experience.

## Assess the legitimacy of intermediaries

After mapping and identifying potential intermediaries to access people with lived experience, financial institutions should assess their legitimacy and commit to periodic re-evaluations of such legitimacy as this may change overtime.

A central challenge is that not all groups genuinely represent the communities they claim to serve. In some contexts, formal trade unions may be absent, non-independent, or controlled by employers – so-called “yellow unions”. Furthermore, union-busting tactics that aim to suppress worker organization are a prevalent risk in many industries and geographies.

This environment raises a critical question for financial institutions: “Who can you trust?”

Partnering with illegitimate intermediaries carries significant reputational and operational risks, including the danger of exacerbating existing imbalances within a community, particularly in CAHRAs. However, financial institutions can improve their knowledge of local power dynamics and avoid these risks by undertaking desk-based research and/or site visits, independently or in collaboration with trusted partners, including National Human Rights Institutions, industry initiatives, researchers and academia.



**Guidance Point 6.** When considering potential worker representative organizations as intermediaries to access people with lived experience, in addition to consulting global labour unions and the [International Trade Union Confederation](#), use the following criteria to assess their legitimacy:

- **Freedom of association:** Share of workers that are in democratically elected activist unions (i.e., unions that bargain/challenge management on core workplace issues);
- **Collective bargaining agreements:** Share of workers covered by enforceable collective bargaining agreements with negotiated provisions that provide better conditions than those required by law;
- **Workplace governance representation:** Committee members are chosen by workers; and
- **Workplace governance representation by gender:** Gender representation in workers' committees is proportionate to the number of women in the workforce.

When assessing intermediaries that provide services or employment pathways for people with lived experience, it is important to recognize that their institutional priorities may not always fully align with those of the people they serve. While leadership or funding by someone with lived experience can be a positive indicator, it does not in itself guarantee the organization's overall legitimacy or representativeness.

**Guidance Point 7.** When selecting potential intermediaries among service providers to facilitate engagement with people with lived experience, assess their legitimacy using the following additional criteria:

- **Lived-experience centred mission:** The organization's core activities are demonstrably focused on supporting people with lived experience – through direct services, capacity-building, professional development, or advocacy;
- **Embedded meaningful engagement principles:** The organization has formal policies and operational systems that align the ORIENTING Principles Framework described below;
- **Proven track record:** There is documented evidence of successful, meaningful engagement with people with lived experience in diverse and influential roles;
- **Relevant geographic and sectoral presence:** The organization has verifiable presence or strong partnerships and networks, in the specific contexts and sectors relevant to the financial institution's portfolio and engagement priorities; and
- **Independence and absence of coercion:** The organization does not provide essential service (e.g., housing, financial aid, or healthcare) in ways that could create conflicts of interest or unduly pressure people with lived experience to participate.

## DEMOCRATIC REPUBLIC OF THE CONGO CASE STUDY:

### Understanding local power dynamics to access legitimate intermediaries

Formal, independent trade unions are virtually absent within the artisanal mining sector of the Democratic Republic of the Congo. Although the industry is organized around cooperatives – established under the 2002 Mining Code to manage miners in designated zones – these entities do not function as independent worker representatives.

In practice, many cooperatives are controlled by political or business elites. Reports consistently show that they often fail to meet their legal responsibilities, including registering workers, paying for wages, ensuring safe working conditions, and preventing child labour. Rather than supporting miners, these cooperatives are widely perceived as corrupt, offering little to no assistance to miners – particularly in cases of workplace injury – thus leaving workers without legitimate representation or recourse.

**“Cooperatives are only looking for money.”**

*An artisanal mining worker interviewed for this project*

Furthermore, awareness of and access to these cooperatives are not universal. Many workers – especially women whose roles are often limited to washing minerals rather than digging – remain outside these formal structures and lack knowledge of how to join them.

In response, some groups of workers have begun forming their own independent cooperatives. However, these grassroots organizations often report being marginalized and excluded from commercial partnerships and sponsorship opportunities due to their advocacy for workers' rights and their efforts to raise issues that the established, elite-controlled cooperatives routinely ignore. This dynamic further fragments worker representation and silences critical voices within the sector.

**“The exploitation going on, the slavery going on.”**

*An interviewee of the project*

Within the Democratic Republic of the Congo's industrial mining industry, the challenge of representation is different but equally severe. Workers report the presence of so-called “yellow unions” – non-independent entities that actively restrict freedom of speech to control and suppress the workers' voice.

The existing mining syndicates, while present, do not function as legitimate worker representatives. In practice, they act primarily as mediators between the workforce and management, a role that inherently limits their ability to advocate independently and forcefully for workers' rights and interests.

In the Democratic Republic of the Congo, financial institutions are advised to engage with local civil society organizations and grassroots networks.



# Use the ORIENTING Principles Framework

In alignment with the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises,<sup>28</sup> and the ILO Multinational Enterprises Declaration, financial institutions can apply the ORIENTING Principles Framework to guide ethical and meaningful engagement with people with lived experience:

## O ONGOING

**Guidance Point 8.** Recognizing that exposure to actual and potential modern slavery risks evolves over time, and aiming to engage in meaningful ways, organizations should interact proactively and consistently with people who have lived experience, rather than relying on one-off consultations. To maximize effectiveness, engagement should occur throughout all stages of the investment cycle and across both levels of engagement within the spectrum.

## R RESPONSIVE

- Guidance Point 9.**
- **Engage early:** Consult people with lived experience before making any decisions that may affect them, ensuring they receive all relevant information in a timely and accessible manner;
  - **Maintain ongoing dialogue:** Establish follow-up mechanisms and feedback loops with people with lived experience to ensure continuous and two-way communication; and
  - **Ensure follow-through:** Integrate the outcomes of these engagements into decision-making processes across the investment cycle. Consistent follow-through will contribute to building trust with people with lived experience and their intermediaries.

## I INCLUSIVE

- Guidance Point 10.**
- **Avoid selective engagement:** Do not “cherry pick” only certain individuals with lived experience or impose unnecessary restrictions that limit who can engage with your financial institution;
  - **Promote diversity and inclusion:** Ensure that consultations reflect diverse perspectives, taking onto account potential barriers that may prevent participation such as language, gender, age, national/ethnic origin, religion and disability status;
  - **Ensure cultural and contextual sensitivity:** Design engagement approaches that are sensitive to the local context and culturally appropriate, including the mechanisms for engagement, venues, timing, and language used. Partnering with local CSOs and intermediaries can help ensure relevance and inclusivity;
  - **Eliminate logistical barriers:** Select accessible venues, schedules and logistical arrangements (e.g., childcare, transportation) and validate these with people with lived experience. Provide financial support to cover any expenses incurred as a result of their participation;
  - **Build equitable capacity:** Offer onboarding and capacity-building activities to ensure equal support and opportunities to all participants to engage meaningfully with your financial institution.

## E EQUITABLE

- Guidance Point 11.**
- **Ensure fair remuneration:** Establish clear mechanisms and administrative processes to ensure people with lived experience are remunerated for their engagement with your financial institution. Offer a range of payment options – such as cash, electronic transfers, or vouchers – to accommodate diverse preferences and circumstances. This is particularly important for Level 2 engagements within the spectrum; and
  - **Determine equitable compensation:** Refer to established guidance and resources to ensure remuneration is fair and equitable, reflective of the value of the time and expertise contributed. For example, consider using [The Peel Regional Council’s Remuneration Framework](#) as a reference.

## N NON-DISCRIMINATORY

**Guidance Point 12.** Avoid creating new or reinforcing existing power imbalances within groups and communities. This can lead to discrimination, bias, or stereotypes against people with lived experience, including by denying their diverse identity(ies).

## T TRAUMA-INFORMED AND SAFE

- Guidance Point 13.**
- **Tailor engagement:** Design interactions to match participants’ skills, interests, capacities, backgrounds and expertise;
  - **Implement safeguarding measures:** Establish a robust framework to protect people with lived experience from potential intimidation and reprisal, including ensuring confidentiality; and
  - **Distribute engagement opportunities:** To avoid placing undue pressure on any single individual, it is critical to recognize that one person cannot represent the full diversity of views, perspectives, and insights of all people with lived experience

## IN INFORMED

**Guidance Point 14.** Ensure that engagements are informed by people with lived experience. For example, begin with a preliminary consultation on “how to consult” to collaboratively define appropriate processes, structures and methods of representation. In addition, establish feedback loops to obtain feedback from people with lived experience to feed into the continuous improvement of the consultation processes and engagement mechanisms.

## G GOOD FAITH

**Guidance Point 15.** Consciously avoid condescension, tokenism and whitewashing when engaging with people with lived experience<sup>29</sup> and work on building relationships based on trust and transparency.

*Note: Please see appendix 7 for additional resources on meaningful engagement with people with lived experience.*



## Engage with people with lived experience through public speaking and ethical storytelling

Storytelling has long been a powerful means for people with lived experience of modern slavery to share their perspectives, influence decision-makers, and shape effective responses. Financial institutions can engage with people with lived experience through storytelling in a variety of formats, including public speaking, oral narratives, written works, visual arts and performance.

For financial institutions, storytelling offers a compelling way to humanize abstract human rights risks, raising awareness among clients, investees and industry peers. Hearing directly from individuals at events or conferences can help secure executive buy-in, inform double materiality assessments, strengthen due diligence and investment monitoring, and catalyse strategic action.

For instance, one finance organization reported that engagement through storytelling prompted investee company CEOs to partner with a government body to address modern slavery risks after gaining a deeper understanding of their human rights risks.

When conducted ethically, storytelling can also be a transformative and empowering process for people with lived experience, fostering healing, agency and self-expression. To ensure ethical practice, financial institutions should avoid tokenistic or extractive approaches – such as using stories for public relations without involving storytellers in the design or planning of the engagement. Such practices can cause harm, erode trust, and risk re-traumatization, particularly when systemic power imbalances pressure individuals to share personal experiences without adequate preparation and support.

**Guidance Point 16.** When engaging with people with lived experience through storytelling:

- Secure informed consent by clearly explaining how, where and why their story will be used, ensuring their participation is entirely voluntary.
- Empower storytellers to share their experiences on their own terms, including choices on format, anonymity, and framing.
- Provide holistic support throughout the entire process, including appropriate onboarding, in-session assistance, and post-engagement follow-up that explains how their contribution informed action or decision-making.
- Ensure fair compensation them for their time and expertise, and reimburse all related expenses, unless the individual explicitly prefers otherwise.

### Box 4. Example of an Innovative model for ethical storytelling

The local lived experience-led non-governmental organization (NGO) Youth Leaders for Restoration and Development (YOLRED) has developed an innovative model for ethical storytelling in partnership with former child soldiers. This approach serves as a leading example of how to centre participants' agency, safety and well-being throughout the storytelling process.

## Use AI for translating lived experience into actionable data

A key challenge for financial institutions is translating qualitative insights from engagements with people with lived experience into actionable intelligence for investment decision-making. The nuanced narratives and contextual understanding gained through these engagements rarely fit neatly into quantifiable metrics, creating a tension with traditional financial or ESG metrics such as key performance indicators, margins, and profit-and-loss statements.<sup>30</sup> This methodological gap can inadvertently marginalize the very voices that hold the most critical information, limiting their influence to drive meaningful action within the organization.

Emerging technologies offer a promising pathway to bridge this gap – enhancing analytical rigour without compromising confidentiality or scalability. For example, Natural Language Processing can systematically analyse qualitative narratives from lived experience engagements and convert them into quantitative data. This enables financial institutions to identify patterns, trends and risks at scale – transforming complex, personal accounts into structured intelligence that directly informs decisions across the investment cycle.

Research conducted through the RESTART project found Natural Language Processing to be highly effective in analysing the needs and challenges of people with lived experience, yielding results consistent with conventional research methods – while offering the significant advantages of scale and real-time analysis.<sup>31</sup>

Beyond Natural Language Processing, AI can power integrated platforms that collect, process and operationalize data collected from people with lived experience. By generating data visualizations and dashboards, these platforms can translate complex, qualitative insights into

clear, accessible intelligence accessible to investment teams.

Importantly, AI allows for the integration of data derived from lived experience directly into established investment decision systems and methodologies. A key strength is its ability to triangulate these unique insights with other critical data streams – such as value chain mappings, worker grievance logs, and media reports.

**Guidance Point 17.** Consider using AI to translate complex, qualitative insights from engagements with lived experience into clear, accessible intelligence, and integrate data into established investment decision systems and methodologies.

### Box 5. An example of leveraging data science for combating modern slavery

The Consortium Contre L'Esclavage Moderne is pioneering an innovative project in the Democratic Republic of the Congo that leverages data science to generate actionable insights for combating modern slavery. The initiative seeks to strengthen corporate social norms against exploitative practices by addressing critical information gaps.

Its innovative approach combines advanced data science tools with on-the-ground qualitative research, analysing a wide range of sources – including interviews with local businesses and people with lived experience – alongside quantitative datasets. This integrated method produces previously inaccessible intelligence on modern slavery-related risks.

By enhancing transparency and revealing blind spots, the project enables business and financial institutions to conduct more rigorous human rights due diligence and make better-informed investment decisions in the country.



## SECTION 3

# ENGAGING PEOPLE WITH LIVED EXPERIENCE ACROSS THE INVESTMENT CYCLE

### Materiality assessments

To validate their materiality assessments, financial institutions can engage directly with people with lived experience. This ensures that all their material risks – to both the institution and the rights-holders adversely affected by its investments – are accurately identified and assessed.

**Guidance Point 18.** When engaging with people with lived experience in materiality assessments:

- In collaboration with legitimate intermediaries, organize consultations to collect input from people with lived experience on the draft materiality assessment (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization or advisory panel to review and validate the draft materiality assessment (Level 2 engagement).

### Industry peer practices 2

#### ABN AMRO<sup>32</sup>

In 2022, ABN AMRO conducted a Level 1 (indirect) engagement by sharing the findings of their salience “pulse check” of human rights issues with external stakeholder groups, including trade unions representing potentially affected rights-holders. Feedback from a trade union confirmed the bank’s identified salient risks and complemented insights from the Enterprise Risk Management System, which was also informed by ongoing conversations with CSOs and trade unions.<sup>33</sup>

#### ING<sup>34</sup>

In 2023, ING demonstrated a Level 2 (indirect) engagement by engaging with CSOs representing people with lived experience to validate the outcomes of their double materiality assessment at both the portfolio and sectoral levels. The CSOs participated in sessions organized by ING to discuss the double materiality assessment methodology and preliminary results. They subsequently reviewed the approach, evaluated the significance and scale of the data, and provided feedback through surveys and in-depth interviews. ING systematically analysed the feedback and incorporated it into the assessment. Some aspects that certain CSOs expected to be included as material were not changed in the outcome, highlighting the critical balance between stakeholder input and internal risk analysis.<sup>35</sup>



## Pre-investment screening

Given the limitations of publicly available data – whether from ESG providers, NGOs, or corporate self-reporting – financial institutions can engage with people with lived experience to identify and assess risks at the asset, project, or portfolio level during pre-investment screening. This approach is critical to: (1) validate pre-identified risks associated with potential assets, projects, or clients and investees; (2) complement and enrich existing screening data, including from standard questionnaires, particularly within CAHRAs; and (3) update and inform exclusion lists.

**Guidance Point 19.** When engaging with people with lived experience in pre-investment screening:

- In collaboration with legitimate intermediaries, conduct consultations to gather feedback on a draft list of identified risks for potential assets, projects, or clients/investees (Level 1 engagement);
- In collaboration with legitimate intermediaries, undertake field or site visits and engage local stakeholders to gain direct, contextual understanding of the investment’s operational environment (Level 1 engagement);
- Employ people with lived experience as staff or consultants or partner with a relevant lived experience-led organization or advisory panel to lead pre-investment screening activities (Level 2 engagement).

### Industry peer practices 3

#### ABN AMRO

ABN AMRO’s engagement with seafarers of deep-sea vessels illustrates a Level 1 engagement with people with lived experience at the sector level, aimed at identifying common risks in the shipping industry and informing their due diligence. The bank reached out to seafarers via social media to gather insights about their working conditions. Consultations were conducted through an online questionnaire distributed to 133 seafarers and 11 interviews with a range of stakeholders, including seafarers, CSOs, human rights defenders and industry representatives. This process enabled ABN AMRO to collect feedback on identified risks and gain critical, on-the-ground insight into labour conditions, ultimately enriching their understanding of salient human rights issues in a sector of strategic importance for the bank.<sup>36</sup>

## In-depth due diligence

Financial institutions can engage with people with lived experience to conduct in-depth due diligence on potential investments categorized as high risk. This approach is especially critical for prioritizing areas with the most significant information gaps, particularly in CAHRAs.

**Guidance Point 20.** When engaging with people with lived experience in in-depth due diligence:

- In collaboration with legitimate intermediaries, conduct consultations with people with lived experience to complement desk-based research on high-risk investments, using their insights to close critical information gaps (Level 1 engagement);
- In collaboration with legitimate intermediaries, undertake field or site visits and consult local stakeholders to gain direct, contextual understanding of the investment’s operational environment (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel to lead the implementation of specific due diligence components (Level 2 engagement).

### Industry peer practices 4

#### Investor Mining and Tailings Safety Initiative (led by the Church of England Pensions Board, AP Funds, and LAPFF)

The Investor Mining and Tailings Safety Initiative demonstrates a comprehensive, multi-stakeholder approach to Level 1 engagement of people with lived experience in in-depth due diligence. Following the tailings dam disaster at Vale’s Brumadinho mine in Brazil, investors, through the [Local Authorities Pension Funds Forum](#) (LAPFF), conducted consultations with local stakeholders, including representatives from affected communities.

Investors facilitated direct participation of these representatives in investor updates and convened multi-stakeholder roundtables, providing a deeper, contextual understanding of the adverse impacts of tailings dams on communities. These engagements effectively complemented desk-based research and addressed critical information gaps. LAPFF continues to conduct community engagement activities across countries, including consultations with workers affected by mining operations.

#### ASN Bank and the Fair Compensation Dashboard

ASN Bank’s use of the [Fair Compensation Dashboard](#) exemplifies a structured and collaborative approach to Level 1 engagement of people with lived experience. By partnering with and financing the Platform Living Wage Financials, the bank leverages a system that collects data from workers and local organizations to support due diligence.

The Dashboard gathers wage data directly from workers through surveys and local consultations, enabling ASN Bank to lead implementation of in-depth due diligence on wage underpayment risks. This approach provides ground-level insights that traditional audits and reporting mechanisms often miss.



#### Box 6. Example of an initiative that provides auditors with lived experience

The construction software platform Compliance Chain and the ethical consultancy Align Ltd have partnered to offer on-site lived experience modern slavery assessments – conducted by consultants with direct, personal experience of exploitation who bring a critical and empathetic perspective to delicate worker situations. This partnership provides a unique approach to in-depth due diligence, combining deep, frontline expertise with digital tools to enhance transparency and enable active prevention within construction value chains.<sup>37</sup>

## Decision-making and agreements

Financial institutions can strengthen their clients' and investees' compliance with the organization's investment standards and alignment with international normative frameworks by leveraging and integrating contractual obligations informed by people with lived experience.

**Guidance Point 21.** When engaging with people with lived experience in agreement-making:

- In collaboration with legitimate intermediaries, undertake consultations with people with lived experience on the contractual obligations currently required by the finance organization to clients and investees (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel to develop or refine risk management clauses in contracts and financing agreements with clients and investees, particularly in CAHRAs (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel to conduct training sessions for clients and investees on human rights and modern slavery, enabling them to meet the financial institutions' requirements (Level 2 engagement).

## Industry peer practices 5

### ICCR and Immokalee Workers

In 2020, a group of investor members of the Inter-Faith Center on Corporate Responsibility (ICCR) engaged with the Coalition of Immokalee Workers, a human rights organization representing tomato farmworkers in Florida, to understand risks in the agriculture industry and the practical implementation of the worker-driven Fair Food Programme.

This engagement informed a strategic decision to use investor leverage to promote the programme with their investees. Investors facilitated dialogue between companies and workers, allowing company leadership to hear first-hand about the benefits of the programme. In addition, investors sent letters to supermarkets encouraging them to join the initiative and updated their proxy voting guidelines to explicitly support shareholder proposals favouring worker-driven mechanisms such as the Fair Food Programme.<sup>38</sup>

This example illustrates Level 1 engagement with people with lived experience, demonstrating how engagement can inform investor leverage and strengthen client and investee standards.

### Box 7. Standards requiring clients/investees to engage lived experience

Major international standards for the finance sector increasingly include mandates for clients and investees to directly engage with affected stakeholders, including those with lived experience.

- **IFC Performance Standards:** As the most widely used and referenced standards in the financial industry, International Finance Corporation (IFC) Performance Standards require clients and investees to engage with affected communities throughout a project's lifecycle. For instance, standard 1 requires that a stakeholder engagement plan include the views of affected stakeholders.
- **Equator Principles:** These principles establish a common risk management framework that requires signatory financial institutions to ensure their clients and investees demonstrate effective, ongoing and culturally appropriate stakeholder engagement. Principle 5 explicitly mandates engagement with affected groups, including workers and Indigenous Peoples.

By referencing these standards, financial institutions have a clear, established basis for requiring their clients and investees to integrate meaningful engagement with people with lived experience. To evaluate how well clients/investees are engaging with stakeholders, financial institutions can use the [Stakeholder Engagement Tool](#) developed by Rights CoLab.



# Monitoring investments

Financial institutions can engage with people with lived experience to enable the continuous monitoring of high-risk assets, projects, and clients and investees. This engagement is also essential for tracking changes in risk levels across the wider portfolio.

**Guidance Point 22.** When engaging with people with lived experience in monitoring investments:

- In collaboration with legitimate intermediaries, conduct consultations to complement desk-based tracking of high-risk investments, using insights to close information gaps (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel to develop a set of quantitative and qualitative indicators to track high-risk investments (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel to lead the ongoing, indicator-based tracking of high-risk investments, including by collecting indicator-based data from actual and potentially affected rights-holders (Level 2 engagement);
- Collaborate or empower people with lived experience to design and use worker-driven monitoring systems, where workers or local communities conduct the tracking of high-risk investments (Level 2 engagement).

## Box 8. Example of worker-led monitoring in action

Electronics Watch exemplifies Worker Driven Monitoring through its network of independent, local labour rights experts. These partners, embedded in workers' communities and trusted by them, create a safe channel for workers to report issues without fear of reprisal. This model reveals critical insights that traditional audits often miss.

By conducting monitoring activities continuously throughout the year, Electronics Watch enables rapid response to worker-reported problems, ensuring timely and effective intervention.

# Industry peer practices 6

## Citi and Mizuho

Citi and Mizuho demonstrate a Level 1 engagement with people with lived experience by incorporating feedback from affected groups and their representatives to monitor the effectiveness of the implemented measures. This includes evaluating clients' progress using indicators informed by affected rights-holders. This approach enables the banks to close information gaps and verify whether the actions taken by their clients or investees are genuinely effective in preventing and mitigating actual and potential adverse impacts.<sup>39</sup>

## ING

ING's approach to human rights due diligence exemplifies Level 1 engagement with people of lived experience in monitoring clients and investees. The bank conducts site visits to select client projects and engages directly in dialogue with local communities through in-person meetings, gaining first-hand insight into project impacts and the effectiveness of the clients' or investees' operational grievance mechanisms. These site visits are conducted in collaboration with their environmental and social consultants to ensure the engagement is meaningful, effective and culturally appropriate. The findings directly inform mitigation measures, closing the loop between monitoring and action.<sup>40</sup>

# Post-investment engagement with clients/investees

Financial institutions can engage with people with lived experience to strengthen their engagement with clients/investees and to use and increase their investor leverage for enabling positive changes in their risk-management practices.

**Guidance Point 23.** When engaging with people with lived experience in post-investment engagement with clients and investees:

- In collaboration with legitimate intermediaries, engage people with lived experience to review or sense-check questions drafted for corporate engagements (Level 1 engagement);
- In collaboration with legitimate intermediaries, invite people with lived experience to speak at public events to increase awareness among clients and investees, following the ORIENTING principles (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel, to co-develop corrective action plans with clients and investees when risks, including modern slavery, are identified (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel, to conduct training sessions and support visits for clients and investees, develop good practice tools, and facilitate peer-to-peer exchanges on risk management (Level 2 engagement).



CCLA

The Churches, Charities and Local Authorities (CCLA) Construction Sector Roundtable in 2024 demonstrates the power of engaging people with lived experience to raise client and investee awareness and drive continuous improvement at Level 2 engagement. By inviting a person with lived experience of modern slavery – via the NGO Bright Futures – to provide a public testimony, CCLA went beyond a simple compliance-focused dialogue. This human-centred approach aimed to shift client and invitee understanding and inspire a deeper, proactive commitment to improving labour practices across their operations and value chains.<sup>41</sup>

ABN AMRO

ABN AMRO’s Human Rights Conference in 2025 exemplifies engagement Level 2 engagement with people with lived experience. The bank facilitated dialogue between a lived experience leader and its clients/investees by featuring a community representative and human rights defender from an agricultural collective in Mexico as a keynote speaker. This brought a critical, on-the-ground perspective into discussions with corporate clients, investees and industry peers. Feedback from the speaker and audience directly informed the continuous improvement of ABN AMRO’s operational-level grievance mechanism, providing specific, actionable suggestions to enhance its effectiveness.<sup>42</sup>

Dutch Pension Funds

From 2020 to 2021, the Dutch Pension Funds cooperated with NGOs, trade unions and the Government of The Netherlands to support their corporate engagement with a mining company in Peru to address salient issues of land rights for indigenous stakeholders and labour rights. As part of the Agreement on Responsible Investment, the Dutch Pension Funds collected, verified and monitored information on the ground from different stakeholders in Peru, including government officials, representatives of the mining sector, academics, the ombudsman and local NGOs representing affected stakeholders and labourers. The regional, thematic and sector-specific knowledge of the NGOs and trade union allowed the pension funds to challenge the company about its practices. The Dutch Pension Funds reported that without this particular knowledge it would have been difficult to assess the commitment of the company on its merits.<sup>43 44</sup>

Exit

Financial institutions can engage with people with lived experience to inform critical and last-resort decisions – such as whether to continue or exit business relationships with clients or investees based on human rights risks or abuses. This is vital in CAHRAs where divestment can pose risks to local communities.

- Guidance Point 24.** When engaging with people with lived experience in terminating business relationships with clients and investees:
- In collaboration with legitimate intermediaries, conduct consultations with people with lived experience to identify risks from both the decision to exit and the manner in which it is carried out (Level 1 engagement);
  - Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization/or advisory panel to develop a responsible exit plan, determining the timing and process for termination (Level 2 engagement);
  - In cases of temporary termination, employ people with lived experience as staff or consultants, or partner with a lived experience-led organization/or advisory panel to define the conditions for potential re-engagement, creating incentives for positive change in clients’ and investees’ risk-management (Level 2 engagement);
  - Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization/or advisory panel to design and operate an operational-level grievance mechanism to address any adverse impacts related to the exit (Level 2 engagement);
  - Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization/or advisory panel to develop nuanced, context-appropriate external communications about the exit that are accessible to actual and potentially affected rights-holders (Level 2 engagement).



# Corporate policymaking and capacity-building

Financial institutions can engage with people with lived experience to embed meaningful engagement and the ORIENTING Principles framework into existing corporate policies, or to develop a dedicated, stand-alone policy governing this practice.

Such policies should align with international normative frameworks and receive formal endorsement from senior management and the Board of Directors. They should establish clear criteria for when and how engagements with people with lived experience will occur, with particular focus on CAHRAs, and define how resources will be allocated to ensure effective implementation. Financial institutions can draw on established best practices, such as the OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector, to guide policy development.

**Guidance Point 25.** When engaging with people with lived experience in corporate policymaking on meaningful engagement with people with lived experience:

- In collaboration with legitimate intermediaries, organize consultations to collect input on existing or draft policies (Level 1 engagement: “Ask”);
- In collaboration with legitimate intermediaries, consult with people with lived experience on modes of engagement to ensure they are contextually and culturally appropriate (Level 1 engagement: “Ask”);
- Employ people with lived experience as staff or consultants, or partner with a relevant lived experience-led organization or advisory panel, to lead the refinement of existing policies or development of a new one (Level 2 engagement).

To implement the endorsed corporate policies, financial institutions can engage with people with lived experience to build corporate capacities that enable meaningful engagement with people with lived experience.

The updated statutory guidance for Section 54 on Transparency in Supply Chains of the United Kingdom Modern Slavery Act recommends that companies include lived experience expertise in the provision of training packages.<sup>45</sup>

“Investors are not trained in [lived experience] sensitivities.”

*A finance organization interviewed for this project*

**Guidance Point 26.** When engaging with people with lived experience in building corporate capacities on meaningful engagement with lived experience:

- Organize, promote and attend events – like those organized by ICCR, Investors Against Slavery and Trafficking Asia Pacific initiative, UN Principles for Responsible Investment, CCLA and Oxfam – that bring together financial institutions and people with lived experience to facilitate informal dialogue and knowledge sharing (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization or advisory panel to lead the design and delivery of training modules for existing training packages or dedicated, stand-alone training sessions, good practice tools, and peer-to-peer exchanges (Level 2 engagement);
- Employ people with lived experience as staff or consultants or partner with a lived experience-led organization or advisory panel to lead the design of a dedicated, stand-alone e-course mandatory for certain functions in your finance organization and clients/investees (Level 2 engagement).

## Industry peer practices 8

In 2023, an Australian finance organization enhanced its corporate capacity by developing a structured modern slavery training programme for its frontline teams. A key differentiator was its partnership with a specialist NGO to integrate direct insights from people with lived experience of modern slavery.<sup>46</sup>

- **Co-developing the framework:** The finance organization and the NGO collaborated to define the scope of the training, focusing on themes such as the level of trust survivors place in financial institutions and the practical role frontline staff can play in identifying and responding to modern slavery;
- **Trauma-informed engagement:** The NGO, adhering to strict trauma-informed and privacy protection principles, facilitated all consultations. Participants were fully informed that their insights would directly shape the organization’s training. Discussions explored real-world interactions between people with lived experience with the financial sector, tested the accuracy of common modern slavery indicators, and identified safe and appropriate response pathways for staff;
- **Outcome and integration:** The insights gathered – combined with the NGO’s expert guidance on risk indicators and trauma-informed engagement – resulted in a practical, evidence-based curriculum featuring real-life examples to help frontline staff more effectively identify risks and implement safe response strategies.



# Feedback loops in corporate governance structures and systems

Financial institutions can establish formal feedback loops to corporate governance bodies (such as senior management or the Board of Directors). This ensures that insights from engagements with people with lived experience directly inform strategic decisions and risk oversight,<sup>47</sup> while also strengthening the application of the ORIENTING Principles Framework across the institution.

**Guidance Point 27.** When establishing feedback loops in corporate governance structures and systems:

- Integrate engagements with people with lived experience into existing monitoring, evaluation and learning systems to evaluate and measure the effectiveness of engagements with people with lived experience, especially across the two levels of engagement;
- Seek to engage with people with lived experience to co-design indicators to measure effectiveness (Level 2 engagement);
- Integrate a feedback loop within monitoring, evaluation and learning systems to enable direct feedback from people with lived experience on the effectiveness of mechanisms and quality of engagements, including across the ORIENTING Principles. Establish direct communication channels between senior management, the Board of Directors, and personnel engaged with people with experience to ensure the insights from people with lived experience are reported and followed through for integration into strategic decision-making;
- Integrate lived experience expertise directly into key corporate governance structures, such as Board subcommittees and senior management forums, to shape the organization’s strategic direction (Level 2 engagement);
- Publicly report on your engagements with people with lived experience as part of your organization’s non-financial disclosures, enhancing corporate transparency and accountability and building industry best practice.

## Industry peer practice 9

### PNC Bank

PNC Bank’s establishment of a National Community Advisory Council is a prime example of creating a formal feedback loop to integrate the voices of people with lived experience into corporate governance. The Council, composed of diverse community leaders, CSOs and non-profit executives, was designed to integrate community perspectives directly into the bank’s lending, investment and service strategic planning. This structure provides continuous guidance to senior management and the Board of Directors, ensuring the bank’s strategy is informed by and aligned with the needs of the communities it serves.<sup>48</sup>





## SECTION 4

# ENGAGING PEOPLE WITH LIVED EXPERIENCE IN GRIEVANCE MECHANISMS

The UN Guiding Principles delineate distinct roles for businesses in providing or collaborating in remediation, contingent on the nature of their involvement in an adverse human rights impact. Financial institutions, whose involvement in human rights abuses is most often through direct linkage to impacts caused by their clients or investees, are not required to provide or cooperate in remediation – though they may choose to play a supporting or enabling role.

One such avenue is through operational-level grievance mechanisms. These mechanisms offer an effective, non-judicial means of remediation for rights-holders affected by adverse human rights impacts in global supply chains. They can also serve as valuable feedback channels, helping financial institutions assess the effectiveness of their human rights due diligence process<sup>49</sup> and identify emerging risks before they escalate.

Some financial institutions may elect to establish and operate their own operational-level grievance mechanisms where this is deemed appropriate to address adverse human rights impacts linked to their portfolios, or to remedy impacts they may have caused or contributed to. However, financial institutions can more broadly leverage their influence by enabling clients and investees to operate such mechanisms. This can be achieved through requirements embedded in:

- Clauses in contracts and financing agreements;
- Pre-investment screening criteria;
- Supplier codes of conduct; and
- Client or investee self-assessments and audit requirements.

Operational-level grievance mechanisms at any level can support financial institutions across the investment cycle. They inform materiality assessments, in-depth due diligence, investments monitoring, post-investment engagement, and guide critical decisions on whether to continue or exit business relationships. Furthermore, they can enable early identification and remediation of human rights grievances – preventing adverse impacts from compounding or escalating over time.

### Box 9. Additional guidance on how financial institutions can enable effective remedies and the role of grievance mechanisms in doing so

- The FAST Initiative, [A Blueprint for Mobilizing Finance Against Slavery and Trafficking, Goal 4 'Providing and Enabling Effective Remedy for Modern Slavery and Human Trafficking Harms'](#)
- First Sentier Mitsubishi UFJ Financial Group and Walk Free: [Modern Slavery and Remediation: Investor's Guidance](#)
- ILO: [Global Accelerator Lab Project](#)
- Fair Cobalt Alliance: [Child Labour Remediation Hub](#)



### ANZ

In 2021, the Australia and New Zealand Action Group Ltd (ANZ) established an operational-level grievance mechanism that enables people and communities to submit complaints directly to the bank concerning human rights abuses linked to its lending. A key feature of this process is its emphasis on facilitating informal and flexible dialogue between the affected rights-holder and the relevant ANZ client or investee, allowing affected rights-holders to articulate the specific outcomes they are seeking to achieve.<sup>50</sup>

### ABN AMRO

In 2023, ABN AMRO piloted a human rights-focused, operational-level grievance mechanism for its financial activities. This process allows affected people and communities to file a formal complaint and enter into dialogue with the bank, facilitated by an independent mediator. The mechanism is designed to work collaboratively with affected rights-holders to reach mutually agreed solutions, which may include appropriate remedies.<sup>51</sup>

According to the UN Guiding Principles, operational-level grievance mechanisms should, among other effectiveness criteria, be based on engagement and dialogue with affected rights-holders. This entails “consulting with the stakeholder groups for whose use they are intended on their design and performance” and establishing dialogue “as the means to address and resolve grievances”.<sup>52</sup>

Financial institutions can engage with people with lived experience to design, establish, operate and enhance the effectiveness of their own operational-level grievance mechanisms – or to inform the mechanisms of their clients and investees.

**Guidance Point 28.** When engaging with people with lived experience in designing, establishing, operating, or increasing the effectiveness of the operational-level grievance mechanism:

- In collaboration with legitimate intermediaries, organize consultations to collect their input on the context-specific design of an operational-level grievance mechanism, with specific focus on CAHRAs (Level 1 engagement);
- In collaboration with legitimate intermediaries, organize consultations to collect their feedback on the effectiveness of the existing operational-level grievance mechanism (Level 1 engagement);
- Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization or advisory panel to lead the development or participatory review and strengthen the operational-level grievance mechanism (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization or advisory panel to develop or refine operational-level grievance mechanisms clauses in supplier codes of conduct, contracts and financing agreements with clients and investees, particularly in CAHRAs (Level 2 engagement);
- Employ people with lived experience as staff or consultants, or partner with a lived experience-led organization or advisory panel to conduct training sessions for clients and investees on establishing and operating effective operational-level grievance mechanisms in line with the UN Guiding Principles (Level 2 engagement).

### Box 10. Examples of bottom-up approaches to remediation and operational-level grievance mechanisms

Leading organizations are pioneering bottom-up approaches to remediation and grievance mechanisms by centring the voices and agency of people with lived experience. These models fundamentally shift traditional power dynamics by enabling affected workers and communities to co-design and participate in the creation and operation of the very systems intended to provide remedy:

- **Electronics Watch’s Worker-Driven Remedy Principles:** A framework ensuring that remedy processes in the electronics industry are defined and driven by the affected workers;
- **Dindigul Agreement:** A legally binding, worker-driven grievance mechanism established in the Indian textile industry;
- **Southern Africa Resource Watch:** A CSO developing community-based grievance mechanisms in collaboration with local populations in the Democratic Republic of the Congo;
- **Coalition of Civil Society for the Abolition of Slavery:** A local monitoring group in the Democratic Republic of the Congo, led by people with lived experience and Congolese NGOs, that oversees implementation of corporate commitments.



## DEMOCRATIC REPUBLIC OF THE CONGO CASE STUDY:

### The need for effective operational grievance mechanisms that integrate the voices of people with lived experience

**“You feel like there is no one to help you, you don’t know who can help you, you can tell someone, but nothing happens.”**

*A woman with lived experience of modern slavery interviewed for this project*

In the Democratic Republic of the Congo’s extractive industry, existing operational-level grievance mechanisms are largely ineffective. Workers in both artisanal and industrial mining report a critical absence of safe, genuine channels to report human rights abuses. Furthermore, mechanisms to facilitate constructive dialogue between mining companies and adversely impacted local communities are notably lacking. Within industrial mining operations, workers describe an environment constrained by lack of freedom of speech and fear of retaliation, undermining the integrity of any formal reporting processes.

**“[We] cannot say anything to the company or [we] will get fired [...] Not even the syndicalist representative can say anything.”**

*An industrial mining worker interviewed for this project*

This governance gap extends to the artisanal mining industry. Workers in this segment highlight a similar deficiency, specifically noting the lack of formal channels to voice complaints within their cooperatives. Compounding the issue, these cooperatives often demonstrate a reluctance to establish grievance mechanisms when approached, perpetuating a systemic absence of accountability and access to remedy.

**“We knew that you could officially write a letter and send it to the manager, but in reality, there was never a follow-up. The people were divided into separate groups: the friends of the owner, of the manager, and those who lived those [abusive] experiences. We cannot reach the right person [to complain] because the person responsible is a friend of the manager and does not want to harm the image of the cooperative.”**

*An artisanal mining worker interviewed for this project*

Furthermore, within the industrial mining industry, reported human rights abuses face significant delays in being addressed, often exceeding a year, and routinely fail to achieve effective solutions or remediation. This systemic failure to provide timely and meaningful outcomes is widely understood to be exacerbated by corruption within government oversight bodies.

**“The Government protects companies.”**

*Human rights organization in the Democratic Republic of the Congo interviewed for this project*

**“Chinese are protected by the authorities; nothing will be done against them.”**

*President of a Cooperative interviewed for this project*

The most severe conditions are found in CAHRAs in the Democratic Republic of the Congo, where people subjected to forced labour in mining face extreme repression. Those who have managed to escape report having had no opportunity to voice grievances, while those still working under coercion live in fear for their lives, completely silencing any possibility of complaint.

**“There were rebels, so we could not speak or report.”**

*A woman with lived experience of modern slavery interviewed for this project*

**“I am afraid of complaining and being taken back to the forest.”**

*A man with lived experience of modern slavery interviewed for this project*

In response to these systemic failures, people with lived experience have called for a fundamental shift in approach. Their central recommendation is the meaningful involvement of workers in the co-design and implementation of operational-level grievance mechanisms. They further advocate for granting workers direct decision-making power within these processes to ensure that outcomes are legitimate, trusted and effective.

**“If there was a possibility to put in decision-making positions people who live in those areas to ensure better decisions and to better protect the workers and the communities [...] A place at the decision-making table. We have experience and know what is going on in the ground. We are best placed to give the best solutions.”**

*An industrial mining worker interviewed for this project*



# CONCLUSION AND CALL TO ACTION

In a rapidly changing world with increasing global challenges, the unique perspectives of people with lived experience are needed for financial institutions, governments, real economy businesses and CSOs to work together and build safe and resilient business supply chains that benefit society and the global economy.

The unique expertise of people with lived experience provides financial institutions with a tool to effectively manage double materiality risks proactively and ensure the resilience of their investments. Financial institutions can and should engage meaningfully with people with lived experience across the investment cycle and the human rights due diligence process by following the ORIENTING Principles Framework, collaborating with legitimate intermediaries to access people with lived experience, and aiming for continuous improvement across the two-level framework of engagements.

Box 11. Five immediate actions for financial institutions

|                                                                                                                                                                                                                                                                                               |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| 1. <b>Support internal capacity-building:</b> Discuss this brief with relevant internal teams.                                                                                                                                                                                                | <input type="checkbox"/> |
| 2. <b>Drive industry-wide awareness and potential collaboration:</b> Share this brief with industry peers and engage in collective discussions.                                                                                                                                               | <input type="checkbox"/> |
| 3. <b>Map lived experience expertise and intermediaries:</b> Map or update relevant lived experience expertise and identify trade unions and CSOs for access to lived experience and engagement collaboration.                                                                                | <input type="checkbox"/> |
| 4. <b>Deepen contextual understanding:</b> Engage with researchers and academics to enhance your understanding of risks and power dynamics in specific industries and contexts, particularly CAHRAs.                                                                                          | <input type="checkbox"/> |
| 5. <b>Initiate informal dialogues:</b> Start informal dialogues with key stakeholders, including trade unions, human rights experts, CSOs, Indigenous Peoples' groups, and lived experience-led organizations at national and international levels, including through conferences and events. | <input type="checkbox"/> |



### Box 12. Medium to long-term strategic actions for financial institutions

|                                                                                                                                                                                                                                                                                                      |                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>Formalize organizational commitment:</b> Develop a formal organizational commitment or a dedicated, stand-alone policy on meaningful engagement with people with lived experience.                                                                                                                | <input type="checkbox"/> |
| <b>Strengthen grievance mechanisms:</b> Establish or enhance operational-level grievance mechanisms ensuring that these are designed and implemented in collaboration with people with lived experience and use investor leverage to encourage clients and investees to implement their own.         | <input type="checkbox"/> |
| <b>Build internal capacity:</b> Invest in corporate training sessions, particularly on trauma-informed approaches and other ORIENTING Principles for meaningful engagement with people with lived experience.                                                                                        | <input type="checkbox"/> |
| <b>Prioritize engagements for high-risk investments:</b> Focus engagement efforts on investments in the energy transition and in CAHRAs.                                                                                                                                                             | <input type="checkbox"/> |
| <b>Deepen stakeholder relationships:</b> Build on global relationships and actively develop new partnerships with trade unions, NGOs and lived experience-led organizations at the regional and local levels to enable context-specific engagements.                                                 | <input type="checkbox"/> |
| <b>Leverage collaborative platforms:</b> Utilize existing investor coalitions and multi-stakeholder initiatives to conduct collaborative engagements with people with lived experience where a unified approach is most effective.                                                                   | <input type="checkbox"/> |
| <b>Facilitate joint engagement:</b> Where appropriate, convene engagement with people with lived experience together with clients and investees to foster shared understanding.                                                                                                                      | <input type="checkbox"/> |
| <b>Innovate with technology:</b> Partner with data scientists and AI experts to explore and implement technological solutions (e.g., natural language processing) that can make engagement with people with lived experience safer, more efficient and scalable.                                     | <input type="checkbox"/> |
| <b>Provide strategic funding:</b> Allocate adequate funding to support capacity-strengthening for lived experience-led organizations, specifically to develop expertise in the financial sector, including the investment cycle, in-depth due diligence, and operational-level grievance mechanisms. | <input type="checkbox"/> |
| <b>Contribute to the development of industry-wide standards:</b> Proactively collaborate with industry peers, financial regulators, standard-setters, multilateral organizations and others to develop industry-wide standards for meaningful engagement with people with lived experience.          | <input type="checkbox"/> |
| <b>Increase transparency and build sector best practice:</b> Publicly disclose engagements with people with lived experience and share good practices and lessons with other financial institutions.                                                                                                 | <input type="checkbox"/> |

# APPENDICES

## Appendix 1. Glossary

**Affected rightsholders:** Individuals or collectives whose human rights are or can be put at risk or negatively impacted by business operations, including through business relationships.

**Artisanal mining:** Mining undertaken without machinery and usually without specific allocated areas.

**Conflict-affected and high-risk areas:** Areas characterized by widespread human rights abuses and violations of national or international law. Conflict-affected areas are characterized by the presence of armed conflict, widespread violence, or other risks of harm to people. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence.

**Civil society organizations:** Non-state, not-for-profit, voluntary entities formed by people in the social sphere that are separate from the state and the market. CSOs represent a wide range of interests and ties. They can include community-based organizations as well as non-governmental organizations. In the context of the UN Guiding Principles, CSOs do not include business or for-profit associations.<sup>53</sup>

**Development finance institutions:** Development finance institutions are multilateral or bilateral financial institutions such as development banks and export credit agencies. They play a key role in directly financing investments needed to achieve sustainable development and human rights and in leveraging resources from the private sector. They traditionally invest heavily in infrastructure sectors.<sup>54</sup>

**Financial institutions:** This guide refers to financial institutions to encompass development finance institutions and institutional investors. This includes asset owners and asset managers that allocate the capital of others into a variety of assets and projects, such as pension funds, sovereign wealth funds, asset managers, insurance companies and banks.

**Forced labour:** All work or service exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.<sup>55</sup>

**Heightened human rights due diligence:** While the UN Guiding Principles do not specifically mention a different type of due diligence, they highlight that “the risk of gross human rights abuses is heightened in conflict-affected areas”.<sup>56</sup> Therefore, in contexts of armed conflict and other situations of widespread violence, businesses should conduct a heightened level of due diligence that is proportionate to the risk.

**Human rights defenders:** Ordinary individuals who defend human rights, including freedom of expression, the rights of women, Indigenous Peoples, and lesbian, gay, bisexual, transgender, queer and intersex (LGBTQI+) individuals. They can act alone or in organizations.<sup>57</sup>



**Human rights due diligence:** Human rights due diligence is undertaken with the goal of identifying, preventing and mitigating adverse impacts to rights-holders and, when required, providing for, or cooperating in, remediation of adverse impacts through legitimate processes.<sup>58</sup>

**Human trafficking:** Legally defined in the 2000 Palermo Protocol, human trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons through coercion, deception, or abuse of vulnerability for the purpose of exploitation.

**Indigenous Peoples:** There is not a legal definition of Indigenous Peoples in international law.<sup>59</sup> However, Indigenous Peoples have in common a historical continuity with a given region prior to colonization and a strong link to their lands. They maintain, at least in part, distinct social, economic and political systems. They have distinct languages, cultures, beliefs and knowledge systems. They are determined to maintain and develop their identity and distinct institutions, and they form a non-dominant sector of society.<sup>60</sup>

**Industrial mining:** Mining undertaken using heavy machinery in mining concession areas.

**Local communities:** Local communities living adjacent to the organization's operations or the site of its activities, including those living at a distance but still affected by such operations.<sup>61</sup>

**Lived experience advisory panels:** A group of diverse people with lived experience (in this guide, it refers to people with lived experience of human rights abuses) that act in a capacity of expert consultants who work on specific projects or requests from the sector. These panels are usually independent and established to ensure that expertise from people with lived experience is considered in a sector to improve policies and practices.

**Lived experience leadership:** People with lived experience that have decided to use their lived experience to make positive change and hold a leadership position within their field or show leadership to their peers and colleagues.<sup>62</sup> Such leadership involves a journey towards professionalization.<sup>63</sup>

**Lived experience-led organizations:** NGOs founded by people with lived experience or where people with lived experience hold leadership positions, such as strategic and decision-making roles. These organizations tend to provide support services and/or employment pathways for people with lived experience or have lived experience advisory panels. In this guide, it refers to lived experience-led organizations as a distinctive type of NGO.

**Modern slavery:** There is not a legal definition of modern slavery. It is an umbrella term used in policy and advocacy to describe situations of exploitation in which a person cannot refuse or leave because of threats, coercion, deception, or abuse of power. It encompasses practices such as human trafficking (as defined in the Palermo Protocol), slavery and slavery-like practices (as defined in the 1926 Slavery Convention and its 1956 Supplementary Convention), forced labour (ILO Convention No. 29), servitude, debt bondage, and the worst forms of child labour (ILO Convention No. 182).

**Operational-level grievance mechanisms:** Non-state and non-judicial grievance mechanisms accessible directly to individuals and communities who may be adversely impacted by a business enterprise. They are typically administered by enterprises, alone or in collaboration with others, including relevant stakeholders. They may also be provided through recourse to a mutually acceptable external expert or body. They do not require complainants to first pursue other avenues of recourse. Instead, they allow individuals to engage directly with the business enterprise to assess the issues and seek remediation.<sup>64</sup>

**People with lived experience:** Rights-holders that have personal, first-hand knowledge of an issue. In this guide, it refers to those with experience of human rights abuses, including modern slavery.

**Rights-holders:** Under the Universal Declaration of Human Rights, all human beings are 'rights-holders'.

**Stakeholder engagement:** An “ongoing process of interaction and dialogue between an enterprise and its stakeholders that enables the enterprise to hear, understand and respond to their interests and concerns, including through collaborative approaches”.<sup>65</sup> It should consider the views of affected stakeholders with respect to activities that may significantly impact them.<sup>66</sup> In some cases, stakeholder engagement is a right in and of itself, such as the right of Indigenous Peoples to be consulted in relation to free, prior and informed consent.<sup>67</sup>

**Tokenism:** An artificial form of diversity that creates a superficial appearance of equality without truly achieving it, which reduces the agency of people with lived experience.

**Trade unions:** A trade union is a membership-based organization made up mainly of workers. One of its main objectives must include the regulation of relations between workers and employers or employers' associations.<sup>68</sup> Such a group of workers joins together to maintain and improve their conditions of employment. The typical activities of trade unions include providing assistance and services to their members; collectively bargaining for better pay and conditions for all workers; and working to improve the quality of public services, political campaigning and industrial action.<sup>69</sup>



## Appendix 2: Acronyms

|         |                                                                 |
|---------|-----------------------------------------------------------------|
| CAHRAs: | conflict affected and high-risk areas                           |
| CCLA:   | Churches, Charities and Local Authorities Investment Management |
| CSDDD:  | Corporate Sustainability Due Diligence Directive                |
| CSOs:   | civil society organizations                                     |
| CSRD:   | Corporate Sustainability Reporting Directive                    |
| HRDD:   | human rights due diligence                                      |
| ICCR:   | Interfaith Center on Corporate Responsibility                   |
| OECD:   | Organisation for Economic Co-operation and Development          |
| UNGPs:  | United Nations Guiding Principles                               |

## Appendix 3: Methodology

This brief was developed by expert researchers, including a lived experience consultant, between June and October 2025 using a mixed-methods approach consisting of:

1. Online semi-structured interviews with multiple stakeholders in developed countries to inform the development of this brief;
2. A rapid desk-review of academic and non-academic publicly available literature on business engagement with people with lived experience and the role of financial institutions;
3. A review of relevant public reports (e.g., human rights, sustainability, modern slavery statements) of selected diverse financial institutions;
4. Semi-structured interviews with financial institutions, CSOs, and people with lived experience of modern slavery at the global level;
5. Interviews in the Democratic Republic of the Congo with local government, CSOs and focus groups with people with lived experience in the mining sector; and
6. A workshop during the United Nations Office on Drugs and Crime’s conference “Voices of Resilience” in Vienna.

This research followed the ethical protocols established by UNDP and FAST, as well as those of the partnering organization Footprints for Freedom, particularly regarding engagement with people with lived experience.

The case study in the Democratic Republic of the Congo was informed by insights collected from a two-week field visit to Kinshasa, Kolwezi and neighbouring towns in the Lualaba region. Interviews were conducted in coordination with the UNDP country office, and discussions with people with lived experience were undertaken in partnership with local CSOs that had established trust and contextual knowledge.

Focus groups with people with lived experience included a dedicated session with children, for which both consent and assent were obtained. Post-session support was provided as needed by the partnering organizations. The consultations were conducted in French with the support of a local translator.

**Table: Summary of stakeholders interviewed for this guide**

| Stakeholder                                                                           | Number of people consulted |
|---------------------------------------------------------------------------------------|----------------------------|
| Financial institutions and investor coalitions                                        | 20                         |
| People with lived experience in developed countries                                   | 8                          |
| CSOs and trade unions in developed countries                                          | 5                          |
| Standard setters and stock exchanges                                                  | 6                          |
| Academics in developed countries                                                      | 1                          |
| Children, men and women working in the Democratic Republic of the Congo mining sector | 19                         |
| The Government of the Democratic Republic of the Congo                                | 6                          |
| CSOs in the Democratic Republic of the Congo                                          | 11                         |
| Mining cooperatives in the Democratic Republic of the Congo                           | 2                          |
| <b>Total</b>                                                                          | <b>78</b>                  |



## DEMOCRATIC REPUBLIC OF THE CONGO CASE STUDY

This brief uses the mining sector in the Democratic Republic of the Congo as a case study to illustrate how financial institutions can engage with people with lived experience of modern slavery. It provides valuable insights into effective engagement approaches in conflict-affected and high-risk areas and within the context of the global energy transition – a key area financial institutions must prioritize.

The Democratic Republic of the Congo is the world’s largest producer of cobalt, accounting for more than 70 percent of supply in 2024. Cobalt is a critical mineral in the clean energy transition, serving as a core component in rechargeable batteries used in smartphones, tablets, laptops and, most significantly, electric vehicles. Cobalt extraction is concentrated in the southeastern provinces, particularly the Lualaba region.

In early 2025, the Government imposed a temporary ban on cobalt exports due to excess production, which has since been extended. However, extraction and processing activities continue within the country. Most of the country’s cobalt production is owned by Chinese companies,<sup>70</sup> which mine and/or refine the cobalt in industrial mining zones, operating through joint ventures with the Government. These activities often take place in an environment marked by corruption and poor accountability.

Alongside industrial operations, a significant proportion of cobalt is extracted informally by artisanal miners either inside or outside industrial concession areas. The informality of the sector, coupled with widespread poverty, corruption, and limited livelihood alternatives, has resulted in unsafe, exploitative working conditions and use of child labour, with many people working in the mines simply to survive.

Artisanal cobalt is typically extracted, washed, sorted and transported by men, women and children and sold through intermediaries, known as ‘negotiators’, who operate at mine sites or warehouses. It is then purchased by industrial mining companies in the country – often Chinese-owned – for further processing. At this stage, artisanal and industrial cobalt mining are mixed, making the two supply chains deeply interconnected and virtually indistinguishable. There is not a purely artisanal and purely industrial mining supply chain. The refined cobalt is then exported – primarily to China<sup>71</sup> – for further refining and ultimately integrated into the global battery and electric vehicle manufacturing supply chains.

Despite widespread human rights abuses in the country’s mining sector, companies and financial institutions rarely engage with people with lived experience to prevent, mitigate, or remediate such harms.

## Appendix 4. Non-comprehensive list of standards and laws on modern slavery, and broader human rights relevant for financial institutions

| Name of standard/<br>law                                                                                               | Simplified description                                                                                                                                                                                                                                                                                                                                 | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">Australia’s Commonwealth Modern Slavery Act 2018 - reporting guidance</a>                                  | Transparency legislation that requires companies to report on modern slavery risks in their operations and supply chains.                                                                                                                                                                                                                              | <ul style="list-style-type: none"><li>• The guide recommends businesses to engage with key stakeholders including communities at risk or workers.</li><li>• Recommends businesses to engage directly with workers and other potentially affected groups to assess risk.</li><li>• Recommends developing trusted relationships with CSOs who can provide information about situations on the ground to improve understanding of modern slavery risks.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <a href="#">Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023- Guide for entities</a> | Reporting obligations for companies producing goods in Canada or elsewhere or importing goods produced outside Canada.                                                                                                                                                                                                                                 | <ul style="list-style-type: none"><li>• Does not require companies to engage with people with lived experience.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <a href="#">Canada’s Custom Tariff Act 2020</a>                                                                        | Forced labour import ban to goods produced with forced labour regardless of origin.                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"><li>• Does not require companies to engage with people with lived experience but evidence from those affected may be used to request a change in the determination.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <a href="#">Corporate Sustainability Due Diligence Directive (CSDDD)- 2024 adopted text</a>                            | First mandatory human rights due diligence legislation at the supranational level and with extraterritorial application. Requires EU and non-EU companies meeting specific threshold requirements to undertake human rights due diligence. Establishes civil liability, financial penalties and potential exclusion from public procurement contracts. | <ul style="list-style-type: none"><li>• Requires companies to engage representatives of affected stakeholders (such as trade unions, worker representatives, and NGOs) in their HRDD process, to gather information.<sup>72</sup></li><li>• Requires companies to engage with stakeholders, including affected rightsholders to develop prevention or correction plans, make the decision to terminate or suspend business relationships, and inform appropriate remediation.<sup>73</sup></li><li>• Requires companies to consult with stakeholders, including affected rightsholders, as appropriate when developing qualitative and quantitative indicators for the monitoring of effectiveness.<sup>74</sup></li><li>• Mentions that while multi-stakeholder initiatives and industry schemes may be used to facilitate consultations with affected rightsholders, these should act as mediators, rather than substitutes for engaging directly with affected people.<sup>75</sup></li><li>• Requires that enterprises consider barriers to engagement and ensure that stakeholders are free from retaliation and retribution, including by maintaining confidentiality and anonymity, and that businesses pay particular attention to the needs of vulnerable stakeholders, including potentially affected groups such as Indigenous Peoples and Human Rights Defenders.<sup>76</sup></li></ul> |



| Name of standard/<br>law                                                                                        | Simplified description                                                                                                                                                                                                                                               | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">Corporate Sustainability Reporting Directive (CSRD) 2022</a>                                        | Sustainability reporting directive that requires companies to report on double materiality impacts.                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Recognises that engagement with those affected may be important to identifying and assessing potentially material impacts.</li> </ul>                                                                                                                                                                            |
| <a href="#">European Sustainability Reporting Standards (ESRS)</a>                                              | Reporting standards for use by all companies subject to the CSRD.                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Mention that engagement with affected people can contribute to better reporting on double materiality assessments.</li> </ul>                                                                                                                                                                                    |
| <a href="#">EU Forced Labour Regulation (EUFLR) 2024</a>                                                        | Import and export ban on goods and products made with forced labour coming into and from the European Union.                                                                                                                                                         | <ul style="list-style-type: none"> <li>Does not require companies to engage with people with lived experience but the Commission will assess issues arising from consultations with civil society and trade unions.</li> </ul>                                                                                                                          |
| <a href="#">EU Sustainable Finance Disclosure Regulation (SFDR) 2019</a>                                        | Requires financial market participants, including asset managers, to disclose sustainability-related information taking a double-materiality approach.                                                                                                               | <ul style="list-style-type: none"> <li>Does not require companies to engage with people with lived experience.</li> </ul>                                                                                                                                                                                                                               |
| <a href="#">French Duty of Vigilance Law 2017</a>                                                               | First mandatory human rights due diligence law developed at the national level. It requires companies to undertake human rights due diligence and imposes civil liability and penalties to non-compliant companies.                                                  | <ul style="list-style-type: none"> <li>The Vigilance Plan is encouraged to be drawn in consultation with stakeholders.</li> <li>Encourages for complaint mechanisms to be developed in consultation with trade unions representing affected rightsholders.</li> </ul>                                                                                   |
| <a href="#">German Supply Chain Due Diligence Law 2021</a>                                                      | Mandatory human rights due diligence law in Germany with extraterritorial application. Requires companies to undertake human rights due diligence and imposes financial penalties to non-complaint companies, including exclusion from public procurement contracts. | <ul style="list-style-type: none"> <li>Requires companies to consider the interests of workers and individuals impacted by their activities when designing and implementing human rights risk management systems.<sup>77</sup></li> </ul>                                                                                                               |
| <a href="#">IFC Performance Standards on Environmental and Social Sustainability 2012</a>                       | Standards directed to clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way.                                                      | <ul style="list-style-type: none"> <li>Clients should identify affected communities and develop and adopt a plan to consult affected communities.</li> <li>Clients must provide affected communities with access to relevant information.</li> <li>Clients must engage with affected communities in the development of grievance mechanisms.</li> </ul> |
| <a href="#">ILO Tripartite Declaration on Multinational Enterprises and Social Policy (the MNE Declaration)</a> | ILO instrument that provides direct guidance to enterprises (multinational and national) on social policy and inclusive, responsible and sustainable workplace practices.                                                                                            | <ul style="list-style-type: none"> <li>The identification and assessment of actual or potential adverse human rights impacts should involve meaningful consultation with potentially affected groups and other relevant stakeholders including workers' organizations.<sup>78</sup></li> </ul>                                                          |

| Name of standard/<br>law                                                                                          | Simplified description                                                                                                                                                                                                                                                                                     | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">International Sustainability Standards Board (ISSB) Sustainability Reporting Standards 2023</a>       | ISSB standards aim to act as a comprehensive global baseline of sustainability-related disclosure by companies. First two standards: <a href="#">IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information</a> and <a href="#">IFRS S2 Climate-related Disclosures</a> . | <ul style="list-style-type: none"> <li>Effective stakeholder management is key. Under IFRS S1 involves engaging with various stakeholders including communities to identify and prioritize material sustainability issues. Under IFRS S2 companies engagement with stakeholders can help them understand their perspectives on climate-related impacts.<sup>79</sup></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Norway Transparency Act 2021</a>                                                                      | Mandatory human rights due diligence law with extraterritorial application and imposes penalties to non-compliant companies.                                                                                                                                                                               | <ul style="list-style-type: none"> <li>Requires companies to communicate with affected rightsholders regarding how impacts are addressed.<sup>80</sup> It also requires businesses to disclose information to everyone that requires it.<sup>81</sup></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <a href="#">OECD Guidelines for Multinational Organizations (2023 updated)</a>                                    | Recommendations to multinational enterprises to minimise adverse impacts on issues including human rights, labour rights, and the environment.                                                                                                                                                             | <ul style="list-style-type: none"> <li>Enterprises are encouraged to engage with relevant stakeholders in order to provide meaningful opportunities for their views to be taken into account in relation to planning and decision making for projects or other activities that may significantly impact local communities.</li> <li>Consider the views of affected stakeholders with respect to activities that may significantly impact them.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <a href="#">OECD guidelines for Responsible Business Conduct for Institutional Investors (2017)</a>               | Guidelines specific for institutional investors for implementing responsible business conduct. It aims to help investors prevent or address adverse human and labour rights impacts in their investment portfolios.                                                                                        | <ul style="list-style-type: none"> <li>Recommend engagement with people with lived experience to identify appropriate prevention or mitigation steps.</li> <li>Recommend investors to communicate relevant information with people with lived experience in a timely, culturally sensitive and accessible manner avoiding posing further risks to them.</li> <li>Mentions that investors may also want to engage with affected stakeholders when there are significant risk of severe adverse impacts to help investee companies shape their response to the risk.</li> </ul>                                                                                                                                                                                                                                                                                                           |
| <a href="#">OECD Responsible Business Conduct Due Diligence for Project and Asset Finance Transactions (2022)</a> | Guidelines that aim to provide a common framework for financial institutions, particularly development finance institutions, on how to carry out due diligence.                                                                                                                                            | <ul style="list-style-type: none"> <li>Recommends investors to identify affected and potentially affected stakeholders and the factors that may increase their vulnerability or capacity to meaningfully engage.</li> <li>It mentions that it would be appropriate for financial institutions to engage directly or indirectly with actually or potentially impacted stakeholders to verify risk assessment or monitoring information provided by the client/project sponsor or supplement it as necessary.</li> <li>Mentions that project or asset finance investors should integrate the views and wishes of negatively impacted rights-holders to develop a responsible exit plan.</li> <li>Mentions that failing to identify and appropriately engage with affected stakeholders by clients' and investees' activities is one of the main adverse impacts for investors.</li> </ul> |



| Name of standard/<br>law                                                                                                                     | Simplified description                                                                                                                                                                    | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">UK Modern Slavery Act 2015</a> , Section 54 Transparency in Supply Chains – 2025 <a href="#">Updated guidance for businesses</a> | Transparency legislation that requires UK companies to produce a modern slavery statement reporting on their efforts for addressing modern slavery in their operations and supply chains. | <ul style="list-style-type: none"> <li>Companies to provide evidence of training packages developed with workers, CSOs, trade unions and people with lived experience.</li> <li>Companies to detail how workers and/or modern slavery survivors have been consulted in developing remediation policy/process in the organization and its supply chains</li> <li>Companies to explain the results of any remediation processes undertaken including the outcome from remediation and whether the remedy was considered satisfactory by survivors.</li> <li>Companies to provide evidence of worker engagement and collaboration (including engagement with individuals and organizations with lived experience of modern slavery) to develop and implement actions, programmes and initiatives to prevent modern slavery and minimise risks.</li> <li>Companies to engage with internal and external stakeholders, including people with lived experience to set goals and KPIs.</li> <li>Companies to engage in worker voice and grievance mechanisms to consult relevant stakeholders including local communities, workers and people with lived experience to understand how the organization and its supply chains affect their lives.</li> </ul> |

### Survivor Safety in Modern Slavery and Sexual Exploitation & Abuse and Harassment (SEAH): Trauma-Informed, Survivor-Centred Approaches

Modern slavery and SEAH can cause long-lasting harms—including physical injury, unwanted pregnancy, psychological trauma such as PTSD, social stigma, and significant economic losses. Survivors often face barriers to reporting, including fear of retaliation, disbelief, or loss of control over decision-making. These barriers intersect with gender, age, disability, race, migration status, and other factors. Engagement with people affected by SEAH therefore requires trauma-informed, survivor-centred approaches that prioritise safety, dignity, and informed consent, while avoiding any burden on victim-survivors to remedy institutional or systemic failures.

| Name of standard/<br>law                                                           | Simplified description                                                                                                                                                                           | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| OECD DAC Recommendation on Ending Sexual Exploitation, Abuse and Harassment (SEAH) | A global recommendation establishing standards for preventing, reporting, and responding to SEAH across development and humanitarian operations, including for IFIs and private-sector partners. | <ul style="list-style-type: none"> <li>Calls for survivor-centred, trauma-informed engagement.</li> <li>Requires safe, confidential, and accessible reporting and support mechanisms.</li> <li>Highlights the need to address intersecting barriers to disclosure.</li> <li>Advises that victims/survivors must not be burdened with responsibility for organisational shortcomings.</li> </ul>                                                                       |
| CAPSEAH (Core Actors for Prevention of SEAH) Guidance                              | A consolidated introduction to global SEAH standards, synthesising international expectations for prevention, response, and survivor support.                                                    | <ul style="list-style-type: none"> <li>Recommends careful, trauma-informed engagement with people affected by SEAH.</li> <li>Stresses the importance of avoiding re-traumatisation and over-reliance on survivors for institutional learning.</li> <li>Encourages context-specific safeguards and safe engagement pathways.</li> <li>Provides resources on survivor support, community engagement and reporting mechanisms.</li> </ul>                                |
| Multilateral Financial Institutions SEAH Working Group – Good Practice Notes       | A set of good-practice documents from multilateral financial institutions on mitigating SEAH risks in investment projects, labour-influx contexts, and corporate operations.                     | <ul style="list-style-type: none"> <li>Advises survivor engagement only within safe, confidential, well-supported structures.</li> <li>Recommends integrating SEAH reporting and case-handling into project grievance mechanisms.</li> <li>Emphasizes the need for trained personnel and clear referral pathways.</li> <li>Highlights safeguards for people at heightened risk, including women, children, migrant workers, and persons with disabilities.</li> </ul> |



| Name of standard/<br>law                                                       | Simplified description                                                                                                                                                                                                          | Simplified requirements/recommendations on<br>engagement with rights-holders                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">UN Guiding Principles (UNGPs) 2011</a>                             | Leading human rights international normative framework that sets guidelines for States and companies to prevent and address human rights abuses committed in business operations.                                               | <ul style="list-style-type: none"> <li>To meaningfully consult people with lived experience to identify and assess potential and actual impacts with which they may be involved either through their own activities or as a result of their business relationships.<sup>82</sup></li> <li>To draw on feedback from internal and external sources, including affected stakeholders, in the tracking and assessment of measures undertaken.<sup>83</sup></li> <li>To communicate how their human rights impacts are addressed, particularly when concerns are raised by or on behalf of affected. It also requires businesses to provide transparency and accountability to individuals or groups that may be impacted through a variety of communication forms including consultation with affected rightsholders in a way that does not pose risks to affected stakeholders.<sup>84</sup></li> <li>To develop effective operational grievance mechanisms based, among other things, on engagement and dialogue with affected stakeholders.<sup>85</sup></li> </ul> <p>To seek to understand the concerns of potentially affected stakeholders by consulting them directly in a manner that takes into account language and other potential barriers to effective engagement.<sup>86</sup></p> |
| <a href="#">United States sec. 307 of the Tariff Act of 1930</a>               | Forced labour import ban that prohibits the entry of goods and products made by forced labour into the United States market.                                                                                                    | <ul style="list-style-type: none"> <li>Does not require companies to engage with people with lived experience.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <a href="#">United States Uyghur Forced Labour Prevention Act (UFLPA) 2021</a> | Forced labour import ban that prohibits the entry of goods made with forced labour into the United States market. Enforced through a rebuttable presumption and an Entity List, and a list of priority sectors for enforcement. | <ul style="list-style-type: none"> <li>Does not require companies to engage with people with lived experience.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

### Appendix 5: Non-comprehensive list of lived experience-led organizations and networks (in alphabetical order)

The organizations below are led by people with lived experience of modern slavery. While these are not homogenous and focus on different human rights abuses and support services, most of them have lived experience-informed training packages and a pool of people with lived experience in employment pathways who are available for public speaking. Some of these organizations also have lived-experience advisory panels/boards that can be consulted by external organizations.

| Name of lived experience-led organization                              | Based in                      |
|------------------------------------------------------------------------|-------------------------------|
| <a href="#">African Survivor Coalition</a>                             | Africa                        |
| <a href="#">ARSAN Asia Freedom Network</a>                             | South-East Asia               |
| <a href="#">Azadi Kenya</a>                                            | Kenya                         |
| <a href="#">BASNET</a>                                                 | United Kingdom                |
| <a href="#">Collective Threads</a>                                     | United States                 |
| <a href="#">Empowerment Collective</a>                                 | United States                 |
| <a href="#">Footprint to Freedom</a>                                   | Netherlands                   |
| <a href="#">Global Survivor Network</a>                                | Global                        |
| <a href="#">Human Trafficking Foundation</a>                           | United Kingdom                |
| <a href="#">Migrant Help</a>                                           | United Kingdom                |
| <a href="#">Migrants at work</a>                                       | United Kingdom                |
| <a href="#">Philippine Survivor Network</a>                            | Philippines                   |
| <a href="#">Shakti Samuha</a>                                          | Nepal                         |
| <a href="#">Sophie Hayes Foundation</a>                                | United Kingdom                |
| <a href="#">Survivor Alliance</a>                                      | United Kingdom, United States |
| <a href="#">Survive and Thrive</a>                                     | United States                 |
| <a href="#">Survivor Voices</a>                                        | United Kingdom                |
| <a href="#">The Freedom Hub</a>                                        | Australia                     |
| <a href="#">Trauma Escapes</a>                                         | United Kingdom                |
| <a href="#">Youth Leaders for Restoration and Development (YOLRED)</a> | Uganda                        |



## Appendix 6. Additional resources on meaningful engagement with lived experience

- For a checklist see:
  - Box 6 p. 53 of UNDP (2024) [Practical Tool for Business on Human Rights Due Diligence and the Environment \(HRDD+E\)](#).
- For principles of meaningful engagement across sectors see:
  - Stitch (2025) [The Framework on Meaningful Stakeholder Engagement](#).
  - Oxfam (2023) [Meaningful Rights-holder Engagement: An Introduction](#).
- For the importance of differentiating between stakeholders and rightsholders see:
  - CORE (2025) [Why Due Diligence Must Center Vulnerable Groups: Prioritizing Those Most at Risk](#).
- For meaningful engagement in the energy transition see:
  - OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector.
  - Business and Human Rights Resource Centre (2024) [Stop and Listen: Pathways to Meaningful Engagement with Rights-holders in the Global Rush to Mine for Transition Minerals](#).
- For further resources from people with lived experience see:
  - Survivor Alliance's [survivor engagement resources](#).
  - [Collective Threads Initiative website](#).
- For a podcast listen to:
  - Modern Slavery PEC (2022) [How to Meaningfully Engage with People with Lived Experience of Modern Slavery](#).
- For guidelines that cut across sectors see:
  - National Roundtable on Human Trafficking and Slavery (2025) [Practice Guidelines for Organizations: Working with People in or At-Risk of Modern Slavery. Multi-sector Guidelines for Individuals and Organizations](#).
- For guidance for engaging with Indigenous Peoples:
  - Taskforce on Nature-related Financial Disclosures (2023) [Guidance on Engagement with Indigenous Peoples, Local Communities and Affected Stakeholders](#).
- For tools on meaningful engagement with stakeholders:
  - Social and Economic Council (SER) of the Netherlands: <https://www.ser.nl/en/themes/irbc/meaningful-dialogue>

## Endnotes

- 1 ILO, IOM and Walk Free (2022) Global Estimates of Modern Slavery <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>
- 2 UNEP (2024) Global Resources Outlook <https://www.unep.org/resources/Global-Resource-Outlook-2024>
- 3 Natural Resource Governance Institute (2021) Resource Governance Index <https://resourcegovernance.org/publications/2021-resource-governance-index>
- 4 ILO 2024 News Annual Profits from forced labour amount to \$236 billion, ILO report finds <https://www.ilo.org/resource/news/annual-profits-forced-labour-amount-us-236-billion-ilo-report-finds>
- 5 ILO and United Nations Environment Programme Finance Initiative (Geneva, 2023) Just Transition Finance: Pathways for Banking and Insurance [https://www.unepfi.org/wordpress/wp-content/uploads/2023/11/Just-transition-finance\\_Pathway-for-Banking-and-Insurance.pdf](https://www.unepfi.org/wordpress/wp-content/uploads/2023/11/Just-transition-finance_Pathway-for-Banking-and-Insurance.pdf)
- 6 Local Authority Pension Fund Forum, Mining and Human Rights: An Investor Perspective (2022) <https://lapfforum.org/wp-content/uploads/2022/10/LAPFF-Mining-and-Human-Rights-Report.pdf>
- 7 Chloe Cranston et al., Respecting Rights in Renewable Energy. Investor Guidance to Mitigate Uyghur Forced Labour Risk in the Renewable Energy Sector (2024) <https://www.antislavery.org/wp-content/uploads/2024/01/ASI-HCIJ-IAHR-Investor-Guidance.pdf>
- 8 Simmons and Burn (2022) Beyond Storytelling: Towards Survivor-Informed Responses to Modern Slavery. University of Technology Sydney. [https://antislavery.org.au/wp-content/uploads/2022/10/ASA-Beyond-Storytelling-report\\_FA\\_accessible.pdf](https://antislavery.org.au/wp-content/uploads/2022/10/ASA-Beyond-Storytelling-report_FA_accessible.pdf)
- 9 Oxfam (2023) Meaningful Rights-holder Engagement: An Introduction <https://www.oxfamamerica.org/explore/research-publications/meaningful-rights-holder-engagement-an-introduction/>
- 10 OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector (2017) [https://www.oecd.org/en/publications/2017/02/oecd-due-diligence-guidance-for-meaningful-stakeholder-engagement-in-the-extractive-sector\\_g1g65995.html](https://www.oecd.org/en/publications/2017/02/oecd-due-diligence-guidance-for-meaningful-stakeholder-engagement-in-the-extractive-sector_g1g65995.html)
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