



National Contact Points for Responsible Business Conduct in a changing landscape

2024 Annual Report on NCP Activity

The [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) (the Guidelines) are recommendations from governments to business on how to act responsibly. Governments adhering to the Guidelines are required to set up [National Contact Points for Responsible Business Conduct](#) (NCPs) to further the implementation of the Guidelines. NCPs are the unique implementation mechanism of the Guidelines and currently exist in 52 countries.

A separate document containing all the data reported by NCPs can be accessed in the online [annex](#).

NCPs:

1. Promote responsible business conduct (RBC) with business and other stakeholders
2. Act as non-judicial grievance mechanisms to contribute to the resolution of issues related to the implementation of the Guidelines
3. May provide support for government policies to promote RBC.

Each year, NCPs report on their activities to the OECD. This report presents the key findings relating to how NCPs address their responsibilities.

At a glance: How did NCPs do in 2024?

POSITIVE TRENDS



The NCP grievance mechanism

56 cases received, second highest yearly total

57% of cases with mediation led to agreement

52 cases closed



Promotion

471 events organised, co-organised or featuring NCPs

45,000 people reached by NCP promotion



Support for government efforts to promote RBC

78% of Adherents that adopted or are developing national action plans on RBC or BHR involve(d) NCPs in the process

56% of NCPs reported involvement in intergovernmental mechanisms regarding RBC



Institutional arrangements

83% of NCPs include stakeholders in their institutional arrangements



Peer reviews and capacity-building

95% of peer review recommendations were fully or partially implemented one year after peer review completion

AREAS FOR ATTENTION

17 NCPs received a case, compared to 25 in 2023, and 35% of NCPs have not received a case in the last five years

1053 day average case duration

6 NCPs do not have case-handling procedures

6 NCPs did not engage in any promotional activity in 2024

46% of NCPs did not have a promotional plan

10% decrease in the involvement of NCPs in the development of policies and regulations that reference the Guidelines

41% of the NCP Network operated with one or fewer full-time equivalent staff

58% of NCPs reported staff turnover in 2024

7 NCPs did not undergo peer review under the voluntary system

2024: laying the groundwork for a new cycle of peer reviews

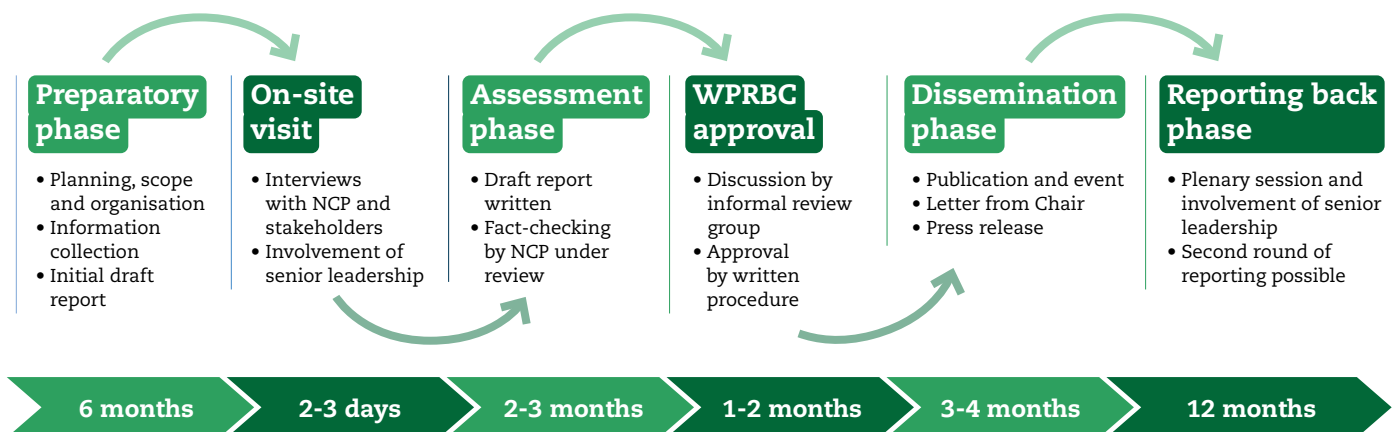
What is an NCP peer review?

Peer reviews are the main way through which NCPs' effectiveness is assessed and reinforced. Peer reviews highlight the achievements and challenges of individual NCPs, and result in public reports containing recommendations for improvement. Peer reviews are facilitated by the Secretariat and carried out by representatives of different NCPs who conduct an on-site visit to the NCP under review, meet with government, business, trade union, and civil society stakeholders and provide recommendations to strengthen the NCP. Recommendations are discussed by the Working Party on Responsible Business Conduct and the OECD Investment Committee before publication.

How has the peer review system changed under the 2023 Guidelines?

Between 2009 and 2024, peer reviews were conducted on a voluntary basis, and proved to be one of the most effective methods for strengthening NCPs. In the years after undergoing a peer review, NCPs have reported increases in absolute staff numbers, increased promotional activity and increases in specific instance submissions. Consequently, the 2023 update of the Guidelines made NCP peer reviews mandatory and periodic according to a revised set of modalities available [here](#). These peer reviews will start in 2025 and follow a seven-year cycle. (See the schedule, [link](#))

The NCP peer review process at a glance



Welcoming the NCP of Mauritius

Mauritius joins the NCP Network as the 52nd NCP!

Mauritius adhered to the Declaration on International Investment and Multinational Enterprises on 6 September 2024.

The NCP of Mauritius includes an **NCP Secretariat**, an **Advisory Panel** and an **Expert Panel**.

- The **NCP Secretariat**, which consists of four officers from the Economic Development Board Mauritius, is responsible for addressing the NCP's promotional responsibilities.
- The **Advisory Panel** consists of representatives of the public and private sectors, including civil society and trade unions. The Advisory Panel provides recommendations on how the NCP can contribute to the effectiveness of the Guidelines.
- The **Expert Panel** is an ad hoc non-judicial panel set up to address specific instances. It consists of at least three persons with expertise in law and dispute resolution.

Visit the Mauritius [NCP website](#) to learn more.

The NCP grievance mechanism

Individuals or organisations from any country can submit a case (referred to as a “specific instance”) to an NCP regarding the conduct of a company operating in or from the country of the NCP. NCPs handle such cases by conducting an initial assessment, offering mediation, issuing recommendations, and making public statements. [Click here to learn how NCPs handle specific instances.](#)

Cases are handled according to each NCP’s own case-handling procedures. In 2024, 46 NCPs had adopted such procedures, meaning that six NCPs were still missing this foundational step to receiving and handling cases. Twenty-one NCPs modified their case-handling procedures in 2024, including updates to align with the 2023 Guidelines. Nearly three-quarters (71%) of these updates involved stakeholder consultations.

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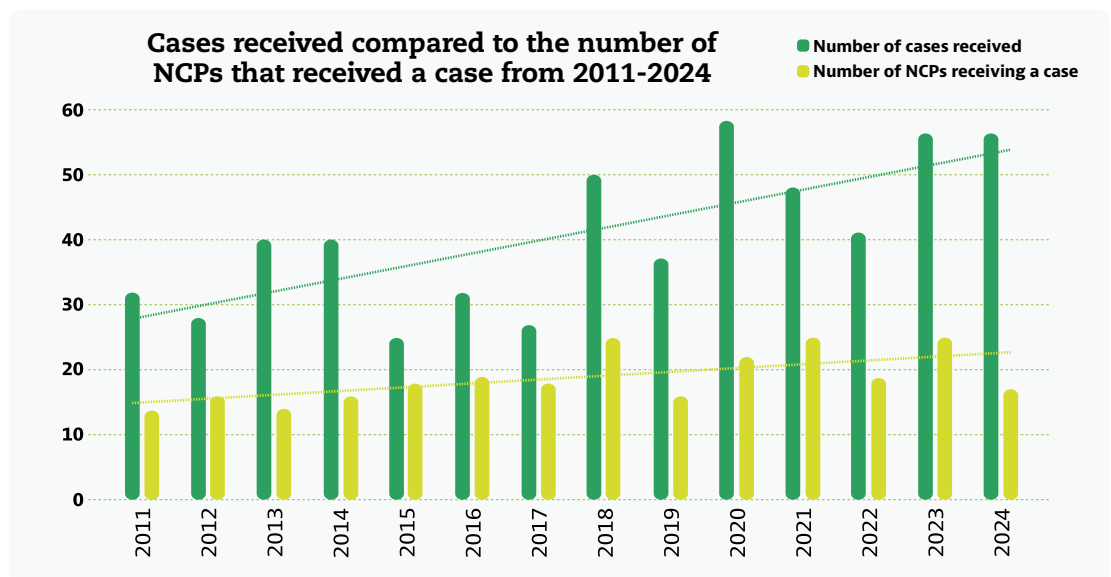
NCP case submissions remain high but are unevenly spread across the Network

56

With 56 cases, 2024 had the second highest submission rate on record.

35%

of NCPs have not received a case in the last five years



When did the NCP receive its last case?

Within the last year	Australia, Austria, Canada, Chile, Denmark, France, Germany, Japan, Korea, Luxembourg, the Netherlands, Poland, Spain, Sweden, Switzerland, United Kingdom, United States
1-5 years ago	Argentina, Belgium, Brazil, Colombia, Finland, Hungary, Ireland, Israel, Italy, Kazakhstan, Latvia, Lithuania, Mexico, Morocco, Norway, Peru, Türkiye
5-9 years ago	Czechia, New Zealand, Slovenia
More than ten years ago	Portugal
The NCP has not received a case	Bulgaria*, Costa Rica, Croatia*, Egypt, Estonia, Greece, Iceland, Jordan, Mauritius*, Romania, Slovak Republic, Tunisia, Ukraine, Uruguay*

*NCPs that adhered in the last five years

16%

decrease in the number of NCPs that received at least one case during the year

NCPs help resolve grievances related to business activity. Submission rates remained high in 2024 with 56 cases received. Since 2011, the NCP network has experienced an average 12% annual growth in cases received.

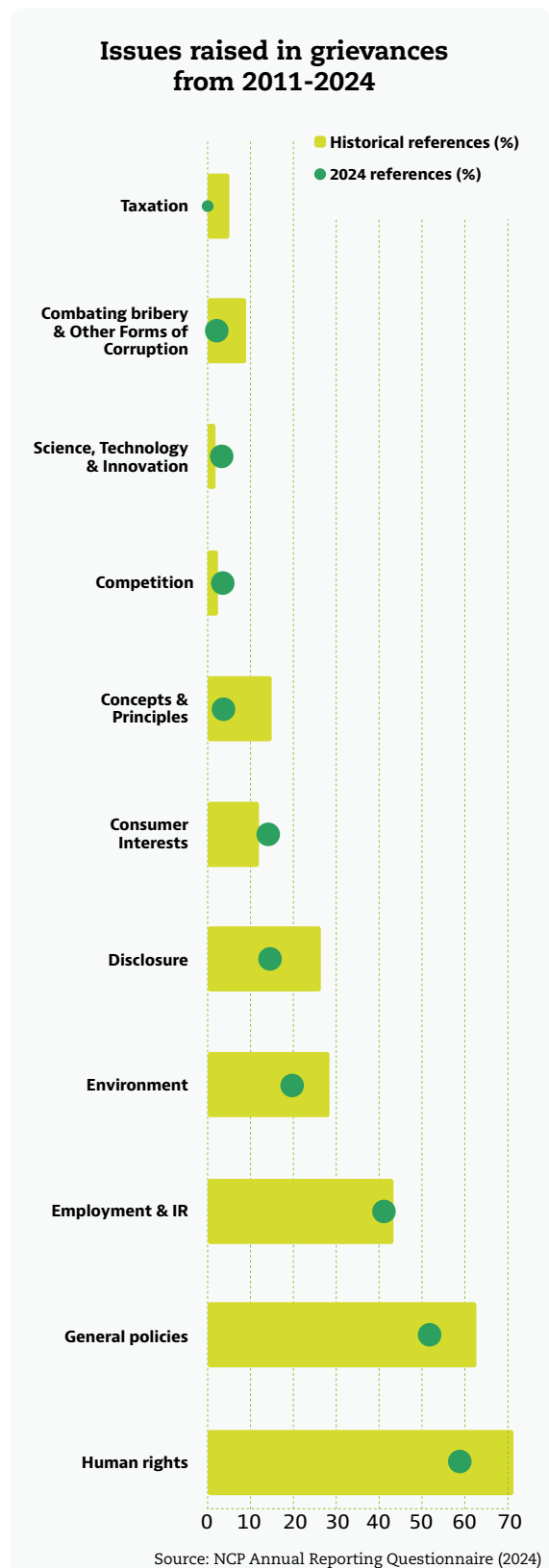
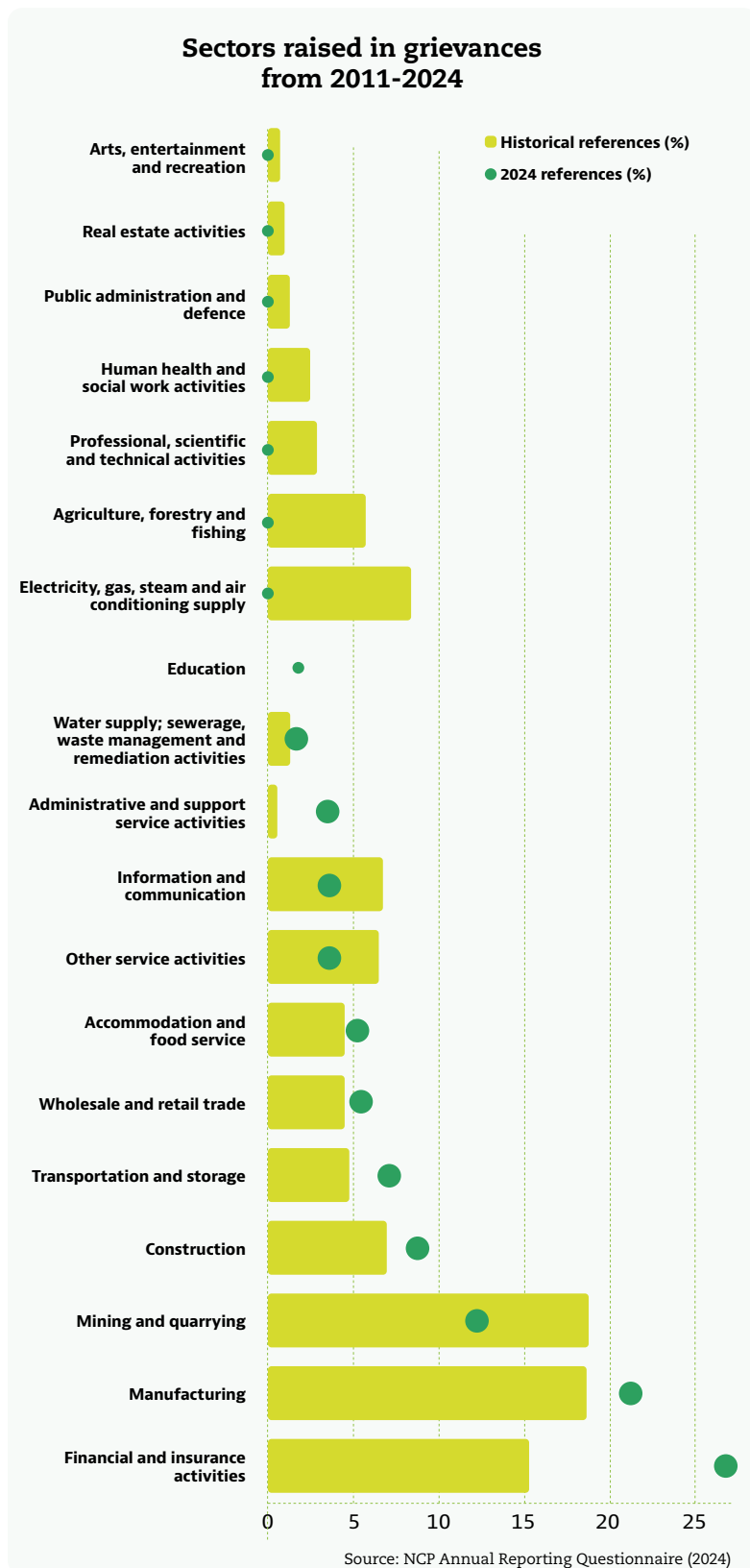
However, in 2024 fewer NCPs received submissions than in previous years.

Seventeen NCPs representing a third of the network received at least one case in 2024, a 16% decrease compared to 2023 and the lowest rate in the last five years, despite an increasing number of NCPs within the Network. While a variety of factors may play into the number of cases received by an NCP, such as the length of time that an NCP has been established, caseloads are uneven and increasingly concentrated within a segment of the Network.

Sectors and issues: Financial and insurance activities is the most prominent sector involved in submissions, receiving almost double historical submission rates.

In 2024, the three most raised sectors in grievances were: financial and insurance activities (15 cases), manufacturing (12), and mining and quarrying (7).

The three most raised issues were: human rights (33 cases), general policies/due diligence (29), and employment and industrial relations (23).



While key sectors raised differ to some extent each year, some trends hold. Financial and insurance activities, manufacturing, and mining and quarrying are historically the top three most cited sectors in cases, although in 2024, the number of cases concerning the financial sector was almost double the historical average. 2024 also saw the second ever case referencing the Education sector, the first having been received in 2017.

Human rights remains the most frequently raised issue, having been cited in the most cases since its introduction to the Guidelines in 2011. ‘General Policies’, i.e. the provisions on due diligence, has consistently been a close second. Case submissions also referenced some of the historically less cited chapters, including two cases related to competition. The chapter on consumer interests additionally saw a 5% increase compared to historical references, the highest increase of all chapters in 2024.

NCP cases demonstrate the global reach of the mechanism

NCPs can handle cases regarding a company operating in or from the territory of their country. This means that NCPs have a global reach, being able to address issues in countries that do not adhere to the Guidelines. Since 2000, NCPs have handled cases with issues arising in over 110 different countries or territories. In 2024, NCPs reported receiving cases with issues arising in 37 different countries, compared to 31 in 2023. Among these 37 countries,

16 (43%) were countries not adhering to the Guidelines. In 2024, Chile (9 cases), Myanmar (7 cases), and the United States (5 cases) were the most referenced countries in which issues arose.

Looking at the extra-territorial activity of NCPs, nineteen of the cases received in 2024 (34%) were submitted to the NCP of the country where the issues

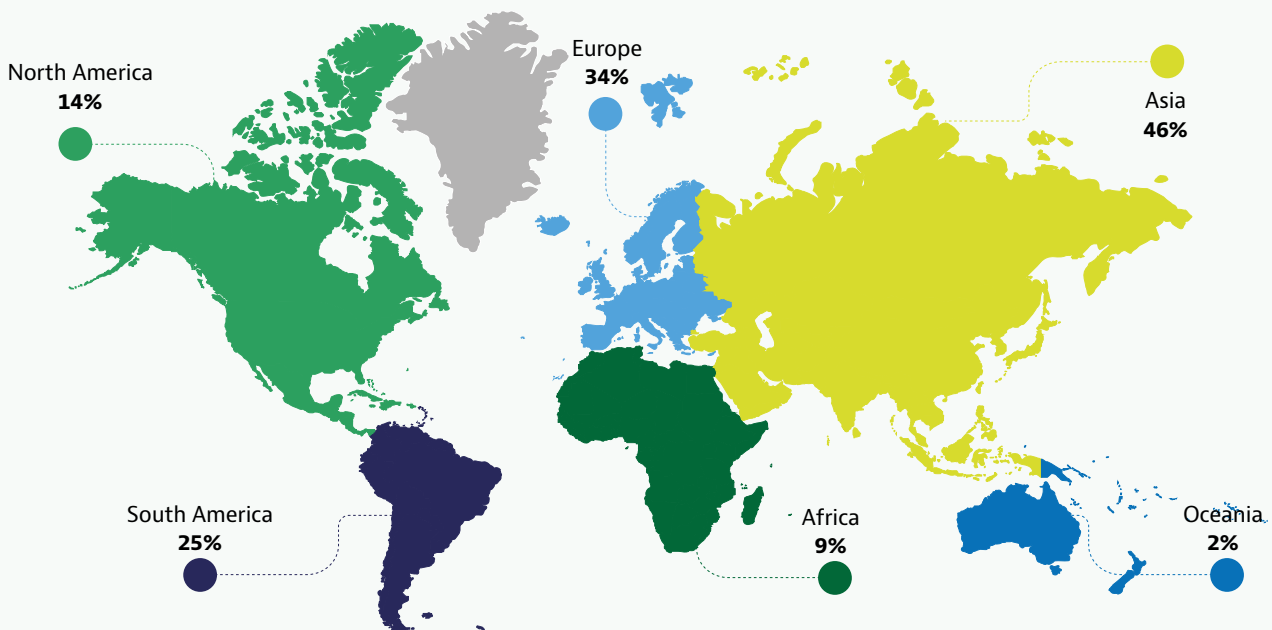
are taking place, which means that in at least two thirds of cases, NCPs were addressing issues involving company operations outside of their country. However, there seems to be a trend in having the NCP of the country of company headquarters lead specific instances. For example, in 57% of the cases closed in 2024 concerning a company headquartered in an adherent country with issues taking place in another adherent country, the NCP of the country of the headquarters was chosen to handle the case.

Finally, while NCPs can receive cases involving companies headquartered in non-adherent countries and with operations in adherent countries, it is not common that they do so (0% of closed cases in 2024, and 5% in 2023).

37

host countries in cases, demonstrating the global reach of NCPs

NCP cases received in 2024 concern issues arising in 37 different countries across six continents



Mediation continues to yield high levels of agreement

2/3

acceptance rates hold with previous trends

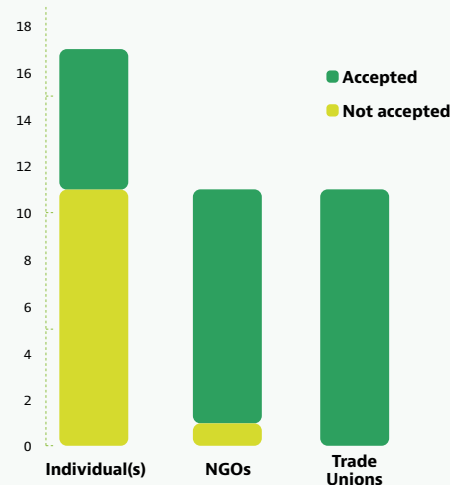
The primary goal of the NCP grievance mechanism is to facilitate agreement between parties using 'good offices'. NCPs closed (concluded or did not accept) 52 cases in 2024, compared to 44 in 2023.

NCPs accept cases in line with historical trends

In order for a case to progress to the good offices phase, it must first pass initial assessment, during which the NCP evaluates whether the issues merit further examination. In 2024, 58% of cases were accepted for further examination. This represents a slight decrease from 2023 when 66% of cases were accepted. When excluding legacy cases from New Zealand¹, the acceptance rate in 2024 rises to 64%.

Acceptance rates remain uneven across different types of submitters in 2024. Looking at cases closed in 2024, all 11 cases submitted by trade unions had been accepted after the initial assessment. Of the 19 cases submitted by NGOs, 63% were accepted, though this rises to 83% when excluding the legacy cases closed by New Zealand. Continuing a trend of previous years, individuals have the lowest acceptance rate at just 35% of the 17 cases submitted, a slight decrease from 2023 when 50% of cases submitted by individuals were accepted. This shows that individuals may be experiencing difficulties building acceptable cases and need increased support from NCPs in doing so.

Acceptance status of cases closed in 2024 by stakeholder group



Note: graph does not include six legacy cases closed by the NCP of New Zealand

NCP cases led to seven agreements in 2024²

When a case is accepted and progresses to good offices, mediation is generally the preferred method of NCPs in facilitating agreement. Agreements between parties are often confidential, but may include provisions for continued dialogue, a stakeholder engagement strategy, some form of remedy such as compensation or reparation, or improvements to the company's due diligence.

Agreement rates vary from year to year, with 2023 seeing a particularly high rate of agreement when eight out of eleven cases (73%) involving mediation led to agreement. While lower than 2023, agreement rates surpassed historical averages in 2024 as agreements were reached in 57% of cases with mediation (four out of seven cases where the me-

diation status was known). This continues to demonstrate the success of mediation in the NCP process.

In a majority of cases (56%) where agreement could not be reached, an agreement was not possible because the company declined to engage in mediation. This is a slight decrease from 2023 when 64% of cases without agreement were due to company refusal to engage, and a slight increase compared to the average rate (51%) at which companies declined to engage in mediation over the last five years. In 2024, when parties engaged in the NCP case process in good faith, only 19% of cases did not result in agreement.³

57%

cases with mediation led to agreement

1. The NCP of New Zealand received eight cases in 2015 that were not formally closed until 2024 due to administrative issues.

2. [Outcomes of all cases closed in 2024 can be found in the data annex.](#)

3. Agreements may also not be reached in the case of insufficient process (delays) or the exact reason may not be reported.

Due diligence obligations for institutional investors

On 5 April 2023, the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations, submitted a specific instance to the Swiss NCP alleging that Lombard Odier, an independent Swiss banking group, had not observed the Guidelines. Specifically, the submitters alleged that Nagaworld, a hotel operator in which Lombard Odier is an investor, violated rights related to trade unions, including dismissals, imprisonment of strikers, violence and threats, and transfer of strikers. The submitters considered that, by not conducting adequate due diligence relating to their investments, Lombard Odier had not observed the Guidelines.

On 20 February 2024, the NCP published a final statement concluding the specific instance with agreement between the parties. Following mediation, the parties agreed on a joint commitment on human rights, confirming their alignment on fundamental principles such as: forbidding abuses; ensuring freedom of association, collective bargaining, and striking; and emphasising the role of the investment community in such issues. The Parties decided that Lombard Odier would participate in a proposal to bring together other institutional investors in a collaborative collective engagement, together with the IUF, in a forum to be co-facilitated by the Swiss NCP to seek NagaCorp's full compliance with the Guidelines relating to labour rights.

Source: International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) & Lombard Odier, <https://mneguidelines.oecd.org/database/instances/ch0026.htm>

NCP cases promote RBC beyond agreements

In addition to agreements, NCPs may facilitate other outcomes that promote RBC. This could include:



Recommendations

- NCPs can issue recommendations to one or both parties on solving the issues or further implementation of the Guidelines.
- In 2024, recommendations were issued in 70% of final statements, and in 78% of final statements where the parties did not reach agreement. This is a slight increase compared to 2023 when 63% of final statements, and 77% of final statements where parties did not reach agreement included recommendations.



Determinations

- Some NCPs have the practice of issuing a determination as to whether or not a company has acted in accordance with the Guidelines. This is most often the case when a company has refused to engage in the specific instance process, or the parties were unable to reach an agreement.

- Determinations were issued in five cases concluded in 2024 (22% of cases without agreement). Four cases determined that the company had not observed the Guidelines, and one case determined observance related to some issues raised but not others. This represents a decrease from 2023 when 36% of cases concluded without agreement led to a determination.



Follow up

- Many NCPs have the practice of following up on the implementation of agreements or recommendations reached during the NCP's good offices. Following good practice developed by NCPs, the 2023 update of the Guidelines added the expectation that NCPs follow up on agreement or recommendations where relevant.
- Over half (53%) of final statements in 2024 included plans for follow up. No follow up was planned in the two cases that were concluded with agreement reached outside of the NCP process. This represents a slight increase compared to 2023 when 50% of final statements referenced plans for follow up.

Summary of outcomes of cases concluded in 2024

Agreements

57% of cases with mediation

Recommendations

70% of final statements
78% of final statements without agreements

Determinations

13% of final statements contain determination that company did not observe the Guidelines

Follow up

53% of final statements include plans for follow up

Human rights violations in conflict affected areas

On 10 September 2022, United Tegar Canada, a Canadian NGO with a mission to advocate and amplify the voices of the Tigrayan people, submitted a specific instance to the Canadian NCP alleging that East Africa Metals Inc., a mineral exploration company, had not observed the Guidelines. Specifically, the submitter claimed that by operating in Ethiopia – and by paying taxes/licensing fees to the Government of Ethiopia – East Africa Metals Inc, is or has been involved with and/or contributing to adverse human rights impacts linked to violations allegedly committed by that country’s government in the context of the Tigray conflict. The submitter also questioned if the company had a policy commitment to human rights and was undertaking appropriate human rights due diligence. The NCP partially accepted the case relating to a policy commitment to human rights and human rights due diligence.

On 7 June 2024, the NCP published a final statement concluding the case. While the parties did not reach a formal agreement, they engaged in a constructive dialogue. The final statement includes recommendations that the company:

- undertake more public communication about its due diligence activities
- consider further elaborating its policy commitment to respect human rights
- give ongoing consideration to how its policy commitment to human rights and due diligence will be fulfilled in the context of its business relationships

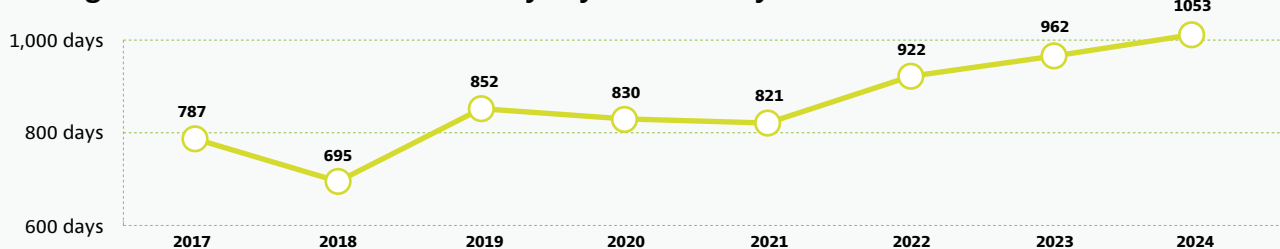
Source: United Tegar Canada & East Africa Metals Inc. <https://mneguidelines.oecd.org/database/instances/ca0029.htm>

Case timelines continue to rise in concerning trend

The NCP grievance mechanism can be attractive to potential submitters for many reasons, such as the variety of thematic issues, the global reach of the mechanism, or because it is offered at no cost to the parties. Submitters may also be drawn to the NCP mechanism due to its short indicative time frame (12-14 months) to handle cases

as compared to some judicial process, for example. However, handling cases within the indicative timeframe continues to pose a challenge for many NCPs. 2024 represented the third consecutive yearly increase in case timelines, rising by almost 100 days on average.

Average concluded case duration in days by conclusion year



Source: NCP Annual Reporting Questionnaire (2024)

Note: 2024 timeline excludes cases from the NCP of New Zealand that were received in 2015 but not formerly concluded until 2024 due to administrative issues. When included, the average case duration rises to 1214 days.



KEY TAKEAWAYS ON THE NCP GRIEVANCE MECHANISM IN 2024

56 cases received

Second highest number of submissions on record

57% of cases with mediation led to agreement

Mediation continues to yield high agreement rate

52 cases closed

Increase compared to 44 in 2023

17 NCPs received a case, compared to 25 in 2023, and 35% of NCP have not received a case in the last five years

Cases increasingly concentrated with a few NCPs

1053 day average case duration

Third year of increasing case durations

6 NCPs do not have case-handling procedures

Not all NCPs are prepared to address grievances



2

Promotion

An important function of NCPs is to promote awareness of the Guidelines and the related due diligence guidance, as well as the visibility of the NCP itself. This requires sustained efforts to raise awareness among the business community, worker organisations, civil society organisations and other interested parties.

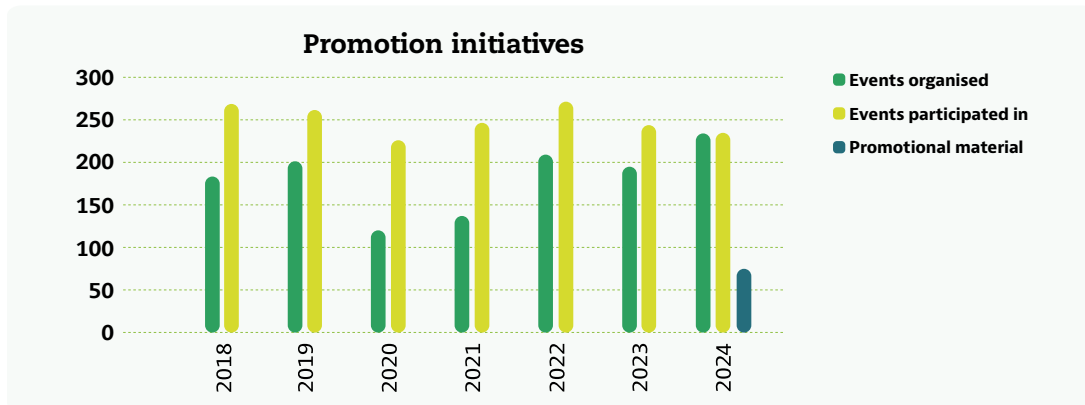
NCPs continued high levels of promotion in 2024

Continuing recent trends, NCPs maintained high levels of promotion in 2024. Forty-one NCPs organised or co-organised 235 events and 35 NCPs participated in 236 events organised by others. Audience sizes varied, ranging from promotional events with less than ten attendees to events with over 100 in attendance reaching more than 17,000 people in

total. This is a decrease compared to 2023, partly due to a change in the counting of promotional initiatives, with the inclusion of a separate

category for promotional materials, which were previously included with event promotion. When accounting for the additional audiences reached as reported in promotion beyond events, the number of people reached by promotional initiatives exceeds 45,000. Overall, there was high promotional activity despite a busy year for specific instance submissions. It is important to remember that promotional events or materials are not the only outlet for NCPs promotion, and many NCPs contribute to awareness raising in other ways, for example through the maintenance of the NCP website.

45,000
people reached by
NCP promotion



NCPs show creativity and innovation in promotion beyond event formats

To better reflect the breadth and variety of the work done by NCPs to address their promotional responsibilities, in 2024 NCPs were invited to report promotional efforts beyond the organisation and participation in promotional events. Developing promotional materials can be a less resource-intensive form of promotion for many NCPs. In 2024, 26 NCPs re-

ported 76 promotional works outside of a traditional events format. These promotional materials reached an estimated audience of over 28,000 people in 2024. Of the 76 reported promotional works, Newsletters (19%), brochures or similar (16%), and flyers (10%) were the most commonly reported types of work.



Brochure developed by the Croatian NCP on the Guidelines and role of the NCP

NCPs additionally reported conducting email or mail campaigns for promotion, and preparing promotional videos. Other types of formats reported include articles or advertisements in the news and translation of promotional materials into local languages.

EXAMPLE of NCPs reinforcing the implementation of the Guidelines in 2024

Translation of the Recommendation on the Role of Government in Promoting Responsible Business Conduct into Turkish

On 9 October 2024, the Turkish NCP co-organised an event held by the Ministry of Industry and Technology to launch the translation of the Recommendation into Turkish. The event included awareness raising around RBC and the Recommendation, including a roundtable of government policy measures in Türkiye on how to integrate RBC.

Learn more: <https://www.linkedin.com/company/ocedturkiyenep/posts/?feedView=all>



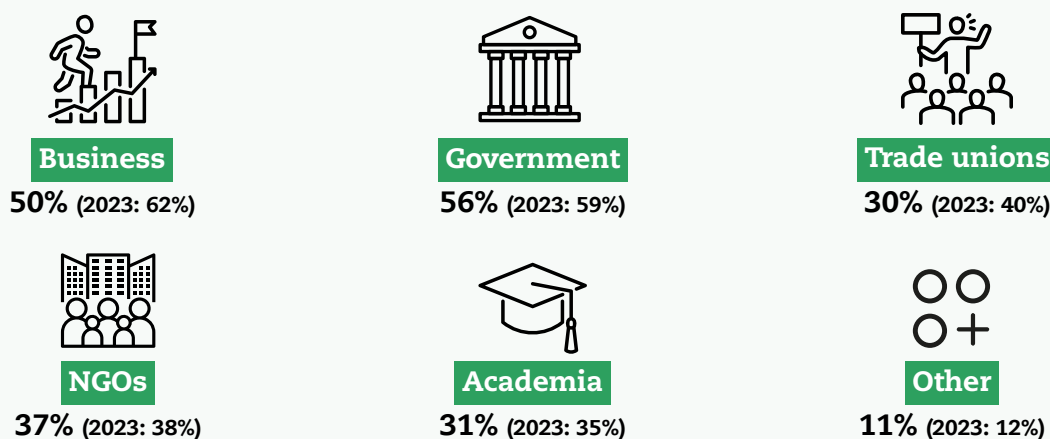
NCP events are primarily targeted at business and government audiences

NCPs are expected to offer promotional activities to a diverse and representative range of stakeholders. In 2024, like in 2023, NCPs organised or co-organised more events addressed to government (56%) or business (50%) representatives than to trade unions (30%), NGOs (37%) and academia (31%), confirming the tendency across the

network to address promotion unevenly to different stakeholder groups. Best practice in this regard has been the development of a promotional plan, which 54% of NCPs had reported developing for the coming year(s), representing the fourth consecutive decrease in NCPs with promotional plans⁴.

54%
of NCPs have promotional plans, down from 67% in 2021

Target audience at events organised or co-organised by NCPs (2023-2024)



Note: Since 39% of events were addressed to more than one stakeholder category, the total percentage exceeds 100%.

NCPs can further support the creation of an enabling policy environment for RBC in line with the Recommendation on the Role of Government to Promote RBC (see below) through their engage-

ment with other government officials and agencies. In 2024, almost half (47%) of NCPs reported promoting the Recommendation among relevant government officials.

⁴ Complete information on NCPs with promotional plans can be found in the data annex.

Partnering with Academia in promoting due diligence and the role of the NCP

On 11 April 2024, the Polish OECD NCP participated in a Thursday's Forum Meeting at the Warsaw School of Economics (SGH), engaging in a discussion on "Due diligence in responsible business conduct."

The event brought together key stakeholders, including representatives from business, NGOs, trade unions, academia, government, and other sectors, to explore the significance of due diligence processes for companies. The discussion also emphasized the crucial role of the NCP in fostering responsible business practices and addressing cases related to potential breaches of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Source: [SGH Thursday Forum #62: Due Diligence in Responsible Business Conduct](#)



NCP websites remain important as social media use decreases across the Network

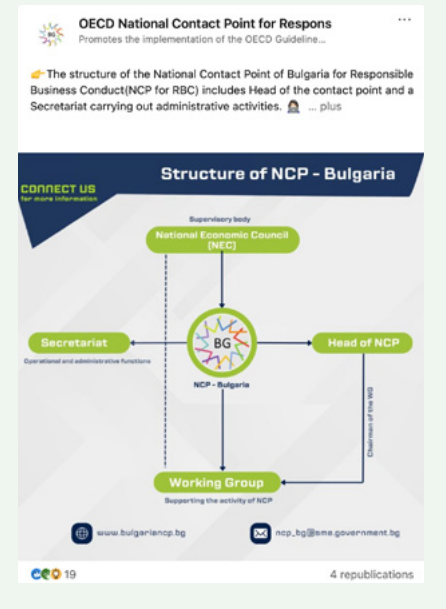
NCPs maintain dedicated websites or webpages to increase visibility and publicly display information on case handling and NCP updates. For many stakeholders, NCP websites have served as a principal point of contact for submitting specific instances. In 2024, 49 NCPs had dedicated websites

or webpages. In addition, 42% of NCPs reported using social media for promotion, a decrease from the 59% of NCPs that reported using social media in 2023. NCPs utilised Facebook, LinkedIn, X, and YouTube for promotion.

Effective promotion of OECD Guidelines on social media

The LinkedIn account of the Bulgarian NCP regularly publishes posts highlighting NCP news, as well as informational content on each chapter of the Guidelines. These posts feature eye-catching designs, making the content more accessible and engaging for a broader audience. This is a valuable practice to enhance awareness and understanding of the Guidelines, serving as a great example to follow.

Learn more: <https://www.linkedin.com/in/oecd-national-contact-point-for-responsible-business-conduct-bulgaria-531ab72b9/recent-activity/all/>



KEY TAKEAWAYS ON PROMOTION IN 2024

471 events organised, co-organised or featuring NCPs

45,000 people reached by NCP promotional efforts

High and impactful promotional activity

6 NCPs did not engage in any promotional activity in 2024

Certain NCPs remain inactive

46% of NCPs did not have a promotional plan

Fourth consecutive decrease in promotional plans

Support for government efforts to promote RBC

According to the Guidelines, NCPs can lend support to their governments' efforts in the development, implementation, and coherence of public policies to promote RBC. This can include, for example, providing expertise on due diligence policies, or leading or participating in the development of national action plans and strategies on RBC.

This role for the NCP is further supported by the [OECD Recommendation on the Role of Government on Promoting Responsible Business Conduct](#) (the Recommendation), which recognises the role that NCPs can play in promoting policy coherence for RBC.

3

NCP involvement in the development of RBC regulations and policies continues

In 2024, 15 NCPs reported references to the Guidelines, the OECD due diligence guidance, or the Recommendation in regulations and policies adopted by their governments that year. Of these 15 NCPs, two-thirds (67%) reported that the NCP was involved in or consulted during their

development. This represents a small decrease from 2023 when 77% reported involvement or consultation in such development. In addition, six NCPs (40%) reported that such adopted instruments make reference to the NCP and/or give a role to the NCP in its implementation.

67%

Among countries that adopted policies referencing OECD RBC instruments, 67% involved NCPs in development

Ukraine Strategy for Recovery, Sustainable Development, and Digital Transformation of Small and Medium Enterprises (SMEs) for 2024–2027

Approved on 30 August 2024, Ukraine has adopted a new Strategy for Recovery, Sustainable Development and Digital Transformation of Small and Medium Enterprises for the period up to 2027 and approved the operational action plan for its implementation in 2024–2027. The Ukrainian NCP reported that it had been involved during the development of this strategy.

This strategy and its Action Plan promote SME growth, emphasizing digital transformation, sustainability and alignment with responsible business conduct principles. The strategy includes:

- development and dissemination of tools for integrating responsible business conduct standards, such as raising awareness of the standards reflected in the UN Guiding Principles, OECD Guidelines, and other relevant documents;
- organising training programs, providing advisory and expert support,
- and introducing self-assessment tools for SMEs to evaluate compliance with RBC standards

The Guidelines are referenced specifically under operational objective 3.2 on responsible and inclusive entrepreneurship, notably in relation to raising awareness of the standards of RBC.

Learn more (Ukrainian): <https://zakon.rada.gov.ua/laws/show/821-2024-%D1%80#Text>

EXAMPLE of NCPs reinforcing the implementation of the Guidelines in 2024

NCPs can play a coordinating role in RBC policy

In 2024, 29 NCPs (56%) reported involvement in intergovernmental coordination mechanisms regarding policy areas covered by the Guidelines and/or relevant for RBC. These coordination mechanisms related to a variety of workstreams such as the EU-Mercosur agree-

ment, the CSDDD, National Action Plans, environmental initiatives and agreements, and interministerial working groups relating to RBC more generally.⁵ In some cases, the NCP itself acted as or led the intergovernmental coordination mechanism.

56%

of NCPs reported involvement in intergovernmental mechanisms regarding RBC policy areas

5. The Secretariat maintains a list of regulation referencing the Guidelines. See the OECD Due Diligence Policy Hub: <https://web-archival.oecd.org/2024-06-19/618402-due-diligence-policy-hub.htm>

NCPs coordinate with one another on their potential role in RBC policy

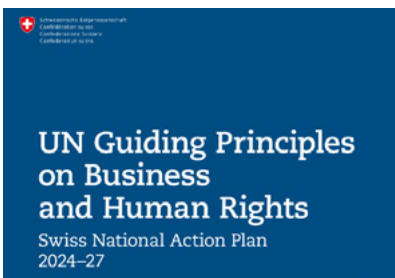
At the November 2024 meeting of the NCP Network in Paris, NCPs discussed the implications for NCPs relating to the adoption of the European Union’s Corporate Sustainability Due Diligence Directive (CSDDD). Twenty-five Adherents to the Guidelines are EU Member States and the CSDDD directly references NCPs. NCPs have identified a number of areas where the implementation of the directive could interrelate with their role, such as a potential role for the NCPs in transposition and implementation of the CSDDD, provisions on promotional work related to promotion done by NCPs, the role of NCPs in relation to supervisory authorities, and the role of the NCP non-judicial grievance mechanism related to remediation of impacts covered by the CSDDD. In 2024, NCPs additionally organised and participated in 30 events at national level related to the CSDDD as part of their promotional due diligence.

NCP involvement in National Action Plans and strategies related to RBC remains high

In 2024, 18 National Action Plans (NAPs) on Business and Human Rights (BHR) or RBC were adopted (4)⁶ or in development (14) in adherent countries. In all four adopted NAPs, both the Guidelines and the NCP were referenced in the text of the NAP. One NAP additionally made reference to the OECD due diligence guidance and the Recommendation.

NCPs in 78% of the countries that adopted or were in the process of developing a NAP reported involvement in its development. This represents a slight decrease from 2023 when 85% of NAPs adopted or in development involved NCP participation. Additionally, 79% of NCPs in the countries with NAPs in development reported that a role was foreseen for them in the implementation of the NAP. These numbers continue to show the role that NCPs can play in supporting their government efforts to promote RBC, both in the development and implementation of related policy.

6. Belgium, France, Switzerland, the United States.



NAP on BHR of Switzerland

Learn more: https://www.nap-bhr.admin.ch/napbhr/en/home/nap/nationaler_aktionsplan1.html



KEY TAKEAWAYS ON NCP SUPPORT FOR GOVERNMENT EFFORTS TO PROMOTE RBC

78% of Adherents that adopted or are developing national action plans on RBC or BHR involve(d) NCPs in the process

NCPs are frequently involved in development of NAPs

56% of NCPs reported involvement in intergovernmental mechanisms regarding RBC

NCPs act as government focal points on RBC issues

10% decrease in the involvement of NCPs in the development of policies and regulations that reference the Guidelines

NCP involvement remains high but has decreased compared to 2023



Institutional arrangements

4

NCP institutional arrangements refer to the structuring and operations of an NCP, including how they engage with or incorporate stakeholder participation. Governments have flexibility in how they structure their NCPs so long as they make available the human and financial resources necessary for the NCP to fulfil their responsibilities.

NCP structures in 2024

19 Single agency NCPs

The NCP is composed of one official in a single ministry, or by a group of officials belonging to the same service in the same ministry.

11 Inter-agency NCPs

The NCP is composed of a group of representatives from several ministries or government agencies, usually with a Secretariat located in one of these ministries, composed of one or more officials.

14 Multipartite NCPs

The NCP is composed of a group of government officials and stakeholder representatives, usually with a Secretariat located in one of the government agencies represented in the NCP.

4 Expert-based NCPs

The NCP is composed of experts who are appointed by, but external to, the government.

3 Hybrid NCPs

Composed of elements derived from different models above.

Note: Some NCPs choose to support their main structural body with a multi-stakeholder or interagency advisory body. In 2024, 33 NCPs have one or more advisory bodies (including 15 Single Agency NCPs and 8 Inter-Agency NCPs).

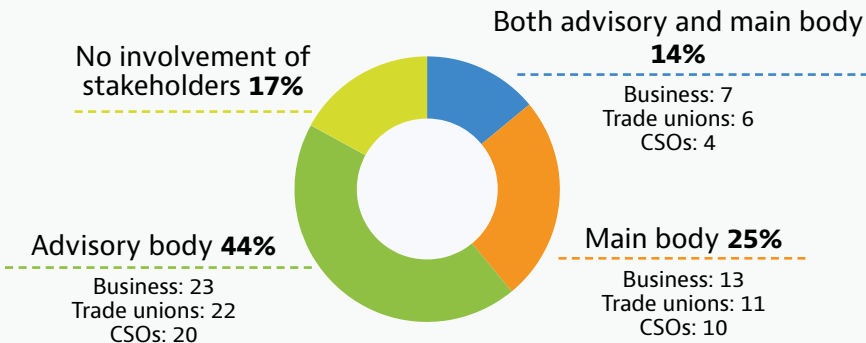
Note for Greece: the NCP is currently working to define a structure following a shift in competent authority for the NCP function.

More NCPs included stakeholders in their structures in 2024

A key component of an NCP’s effectiveness is its ability to engage with and maintain the confidence of stakeholders. In this regard, incorporating stakeholders into its institutional arrangements - whether through membership in the NCP’s main body or a multi-stakeholder advisory body - can enhance the NCP’s trustworthiness, expertise, and visibility. Stakeholder inclusion broadens the range of knowledge and perspectives available to the NCP, strengthening its capacity to handle cases effectively and uphold the Guidelines. Moreover, fostering strong stakeholder relations can improve transparency, accessibility and impartial-

ity, ultimately enhancing the NCP’s ability to fulfil its responsibilities. In 2024, 83% of NCPs included stakeholders in their institutional arrangements, compared to 80% in 2023. Ireland and Peru both created stakeholder advisory boards in 2024, thereby implementing recommendation from their peer reviews. This continues the trend of NCPs increasingly including stakeholders in their structures, notably as this aspect was reinforced in the updated Guidelines. All stakeholder groups are however not systematically included in NCP structures, as business is included in the structure of 43 NCPs, trade unions 39 NCPs, and CSOs 34 NCPs.

Stakeholder (SH) involvement in NCPs’ institutional arrangements



83%
of NCPs include stakeholders in their institutional arrangements

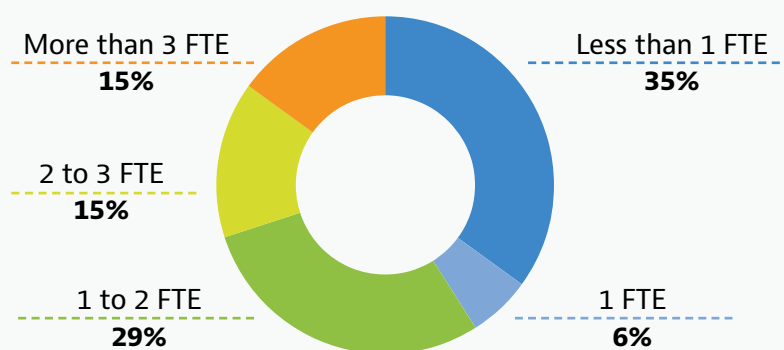
Most NCPs remain under-resourced

More than **1/3**
of the NCP Network
operated with one or
fewer FTE

Another challenge NCPs faced throughout the year was the ongoing difficulty of securing sufficient human and financial resources, which in some cases has limited their ability to effectively fulfil their responsibilities. In line with 2023 the proportion of NCPs operating with more than two full-time equivalent (FTE) staff re-

mained steady, accounting for 30% in 2024. Meanwhile, similar to in 2023, 41% of NCPs were operating with one or fewer full-time equivalent (FTE) staff in 2024, often leaving them under-resourced to effectively address responsibilities. This is a challenge in achieving functional equivalence of NCPs, as a sizeable portion of the NCP network continues to operate with much lower resources than the better resourced NCPs.

FTE staff resources available to the NCP Network in 2024



Note: N=52 - Source: NCP Annual Reporting Questionnaire (2024)

Staff turnover remains high but declines in 2024

58%
of NCPs
reported staff
turnover in 2024

Beyond the total number of staff, staff turnover may impact the effectiveness of NCPs. Staff turnover remained high in 2024 but decreased compared to 2023, dropping from 65% to 58%. Given also that more NCPs reported staff joining (50%) than staff leaving (44%) in 2024, NCPs overall were operating with more staff, and a more stable staff, than in previous years. Nevertheless, over 1/4 (26%) of NCP staff were new to their roles in 2024. High staff

turnover can strain institutional memory, disrupt continuity in ongoing cases, require NCP resources for training, and weaken stakeholder relations if contacts are not maintained.

More staff
With more staff joining
than leaving, and less staff
turnover than in 2023, NCPs
operated with more staff,
and more stable staff than
in previous years



KEY TAKEAWAYS ON NCP INSTITUTIONAL ARRANGEMENTS IN 2024

83% of NCPs include stakeholders in their institutional arrangements

Stakeholder engagement in NCP structures remains high

41% of the NCP Network operated with one or fewer FTE

Levels of human resources are stable but still insufficient

58% of NCPs reported staff turnover in 2024

Staff turnover remains high but decreased since 2023

Peer reviews and capacity building

5

NCPs have to achieve ‘functional equivalence’ among NCPs, or in other words, that all NCPs operate with an equivalent degree of effectiveness. Effectiveness of NCPs is defined according to the following criteria: visibility, accessibility, transparency, accountability, impartiality and equitability, predictability, and compatibility with the Guidelines. In order to achieve this, under the supervision of the OECD Investment Committee and Working Party for Responsible Business Conduct, NCPs regularly engage in peer reviews and capacity building activities, such as bi-annual NCP network meetings, or other training activities.



Delegates of the WPRBC and OECD Secretariat after the November 2024 WPRBC meeting

Peer reviews

NCPs routinely engage in peer reviews as a way to increase effectiveness. Three peer reviews were conducted in 2024 with seven NCPs joining as members of peer review teams.

NCP under review	Visit date	Peer reviewer NCPs
Romania	March	Kazakhstan, Portugal, Spain
Finland	May	Denmark, Ireland
Israel	November	Latvia, Netherlands

This concludes the cycle of voluntary peer reviews, many of which were conducted following the [commitment made at the OECD Ministerial Council Meeting in 2017](#) to have all NCPs peer reviewed by 2023 (extended by one year due to COVID-19). As of the end of the voluntary peer re-

view cycle, the NCPs of Colombia, Egypt, Greece, Jordan, Mexico, Tunisia, and Ukraine had not undergone a peer review. Peer reviews under the new mandatory system (see above) will begin in 2025.

EXAMPLES of NCPs reinforcing the implementation of the Guidelines in 2024



NCPs of Kazakhstan, Portugal, Spain, and Romania, together with the OECD Secretariat and the President of the Romanian Agency for Investments and Foreign Trade at the peer review of the Romanian NCP.

61

recommendations made by peer review teams to NCPs under review

In 2024, seven new NCP peer review reports were published⁷, including a total of 61 recommendations made by peer reviewer NCPs to strengthen the NCPs under review. Recommendations included establishing the NCP as an enabler

of coordination on RBC between different parts of government, developing comprehensive promotional plans, adopting case-handling procedures in line with the 2023 Guidelines, and actively promoting the Recommendation within government.

Nine NCPs reported back on progress made to implement 71 recommendations since their peer review reports were published.⁸ Reporting back highlighted actions NCPs have taken to further the implemen-

tation of the Guidelines, such as increasing engagement with NCP membership and work to increase stakeholder confidence, changing the location of the NCP to safeguard impartiality, and works to develop multi-stakeholder advisory bodies. Out of the 71 recommendations issued to the NCPs reporting back, 26 (37%) had been fully implemented, 41 (58%) had been partially implemented, and four (6%) had not been implemented at the time of reporting back.

95%

of peer review recommendations were fully or partially implemented one year after peer review completion

Other capacity-building and peer-learning activities

As RBC is a dynamic agenda, and new issues and priorities emerge regularly, NCPs constantly have to build capacity, and set themselves specific objectives such as increasing visibility and stakeholder engagement, increasing the expertise available to the network, and ensuring effective and efficient handling of specific instances. Moreover, as a decentralised implementation system composed of 52 entities, the NCP Network needs to coordinate to ensure coherence and consistency in the delivery of their responsibilities. In 2024, NCPs continued to implement the [Action Plan to Strengthen NCPs \(2022-2024\)](#). A new Action Plan, covering 2025-2027, will take effect in 2025.

The new Action Plan is articulated around the following priorities:

1. **Consolidation:** Building on and leveraging existing materials to address current needs
2. **Compatibility:** Implementing the updated Guidelines and Implementation Procedures
3. **Closing the gap:** Addressing gaps in the achievement of core effectiveness criteria where needed

In 2024, seven NCPs reported hosting a peer-learning activity and 23 NCPs reported attending a peer learning activity hosted by another NCP. Additionally, 25 NCPs reported participating in or hosting a meeting of a regional network of NCPs. NCPs indicated priority areas, such as NCP coordination in case-handling, engaging government in RBC, and mediation, for future peer learning and capacity building.

7. Estonia, Hungary, Iceland, Kazakhstan, Poland, Romania, and Türkiye. The reports are publicly available at [NCP Peer Reviews](#)

8. Czechia, Latvia, Luxembourg, Morocco, New Zealand, Peru, Portugal, Slovak Republic, Slovenia (2nd time reporting back).



KEY TAKEAWAYS ON PEER REVIEWS AND CAPACITY BUILDING IN 2024

95% of peer review recommendations were fully or partially implemented one year after report publication

Peer reviews are an effective mechanism for strengthening NCPs

7 NCPs did not undergo peer review under the voluntary system

Not all NCPs have had the opportunity to receive recommendations for improvements

Peer learning activity hosted by the Austrian NCP in Vienna, Austria

On 22 October 2024, the Austrian NCP organised a peer learning activity in Vienna. The agenda included topics on specific instances and promotional activities, and provided opportunities to go deeper into stakeholder engagement, handling and acquiring resources, collaboration with advisory boards, and support for government efforts to promote RBC.

Participants were further invited to arrive in Vienna on 21 October to attend the Annual Austrian Multi-Stakeholder Forum. The Forum included experts from business, labour, civil society, politics and academia to discuss ongoing developments related to the Guidelines.



2024, a year in review

NCPs continued to develop and bolster many good practices across their areas of responsibility. Specific instance submissions reached record highs for the second year in a row with submissions increasing an average of 12% per year since 2011. Additionally, cases continued to demonstrate the breadth of issues covered by the Guidelines and the role that NCPs can play in remediation. However, challenges remained for NCPs as a significant share of companies continue declining to engage in the grievance mechanism, and following indicative timelines was not always feasible. NCP promotional work remained strong and continued to demonstrate creativity, particularly in the case of often limited resources. Faced with a continuously changing global RBC policy landscape, many NCPs demonstrated the role that they can play in support their governments' efforts to promote RBC and related policies. The strength of the NCP Network was further demonstrated through continued engagement in peer reviews and the numerous opportunities for peer-learning where NCPs came together to support one another. However, many NCPs continued to face challenges related to limited resources, contributing to a widening gap in the functioning of NCPs with higher and lower resource levels. While 2024 showed many strengths for the NCP Network, 2025 will be an opportunity to address continuous challenges and work further towards functional equivalence for all NCPs.

Access further data on the NCP Network in 2024 in the annex

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Additional resources

Read the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: <https://www.oecd.org/en/topics/policy-issues/responsible-business-conduct.html>



OECD Guidelines for Multinational Enterprises on Responsible Business
Conduct

2024 Annual Report on NCP Activity

Data Annex



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1 Specific instances

Overview of specific instances handled in 2024

Box 1.1. Terminology for the status of specific instances

- Specific instances **closed** during the year include both specific instances that have been concluded during the year and those that were not accepted during the year.
- Specific instances **concluded** during the year are those that the NCP found to warrant further examination after the initial assessment and that have subsequently been closed. For such specific instances, the NCP will have offered its “good offices” (e.g. mediation/conciliation) to both parties.
- Specific instances **not accepted** during the year are those that the NCP found not to warrant further examination, or cases that have been withdrawn prior to the completion of the initial assessment and that have therefore been closed.
- Specific instances that are **in progress** are those that are not yet closed. These include submissions received by the NCP, both those awaiting initial assessment, as well as those accepted by the NCP.
- NCPs may conduct **‘follow-up’** after a case has closed to assess the implementation of the recommendations issued or agreement reached.

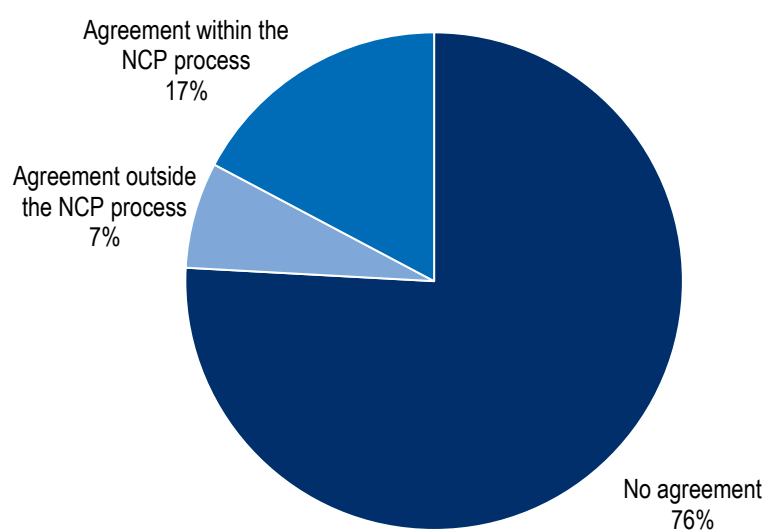
Outcomes of specific instances closed in 2024

1. In 2024, 21 NCPs closed 52 specific instances. This represents an increase in cases closed compared to 2023 when 12 NCPs closed 44 specific instances. Among the 52 specific instances that were closed in 2024:
 - 49 were already in progress as of 1 January 2024, and
 - three were submitted during the year.
2. Out of the 52 specific instances closed in 2024:
 - 30 were concluded, and
 - 22 were not accepted
3. NCPs followed-up on ten previously concluded specific instances in 2024. The follow-up process had been commenced but not completed for an additional five specific instances as of the end of 2024.
4. Of the 22 concluded specific instances where the mediation status is known, six (32%) underwent mediation, compared to 42% in 2023.

5. Eleven NCPs (21%) reported that NCP staff had undergone dispute resolution (e.g. mediation) training during the year. Nine NCPs reported conducting mediation during the year. Of the NCPs that reported conducting mediation, four (44%) reported that the NCP itself had conducted the mediation, four (44%) reported that mediation was conducted by a professional mediator, and one (11%) NCP reported that mediation had involved both the NCP and external mediators during the year.

6. Five concluded cases led to full agreements between parties within the NCP process and two resulted in full agreements between parties outside of the NCP process (Figure 1.1). Agreement between parties was therefore reached in 24% of all concluded cases and in 57% of all concluded cases where mediation occurred, compared to 73% in 2023 and 36% in 2022.

Figure 1.1. Outcomes of specific instances concluded in 2024

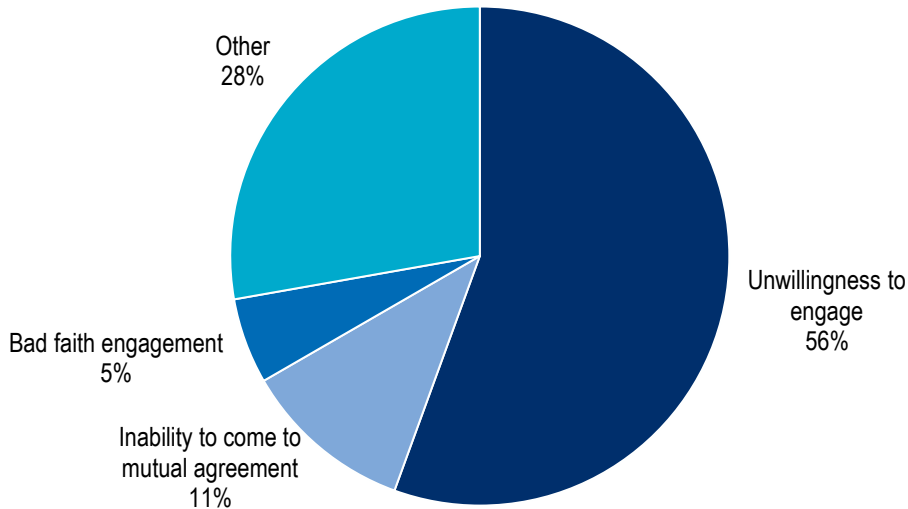


Note: N=29

Source: NCP Annual Reporting Questionnaire (2024)

7. NCPs reported various reasons explaining why no agreement could be reached, such as a refusal to engage on the part of one of the parties, an inability to reach agreement despite engagement from both parties, and bad faith engagement in the process. Figure 1.2 shows the reasons agreement could not be reached, as a percentage of all cases concluded without agreement in 2024. Refusal to engage was reported as the reason for no agreement in a majority of cases that did not reach agreement (56%), compared to 64% in 2023.

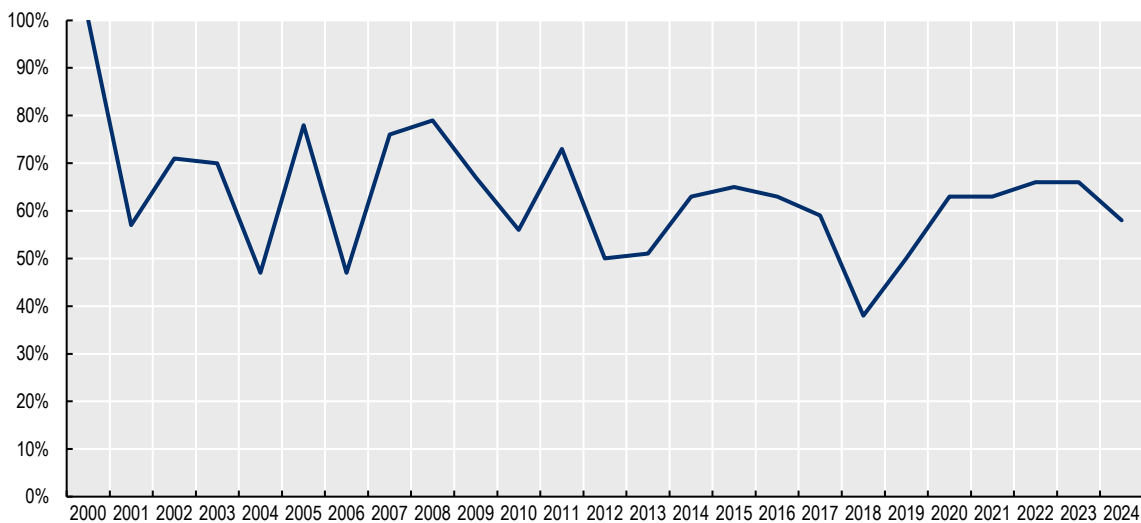
Figure 1.2. Reported reasons for no agreement in 2014



Note: N=18
 Source: NCP Annual Reporting Questionnaire (2024)

8. Of the 52 specific instances closed in 2024, 32 (58%) were accepted for further examination, compared to 66% in 2023 (Figure 1.3). The NCP of New Zealand formally closed eight specific instances in 2024 that had originally been submitted in 2015-2016 and were not formally closed due to administrative issues at the NCP. When excluding these legacy cases, the acceptance rate of cases closed in 2024 rises to 64%. Of the 11 submissions closed in 2024 submitted by trade unions, 100% were accepted for further examination with 18% of accepted cases leading to agreements. Of the 19 cases submitted by NGOs, 63% were accepted for further examination. When excluding eight legacy cases received by the New Zealand NCP in 2015 and formally closed in 2024, the acceptance rate rises to 83%. Of accepted cases submitted by NGOs, 17% led to agreements. Of the 17 cases closed in 2024 submitted by individuals, 35% were accepted for further examination with 13% of accepted cases leading to agreement (Figure 1.4).

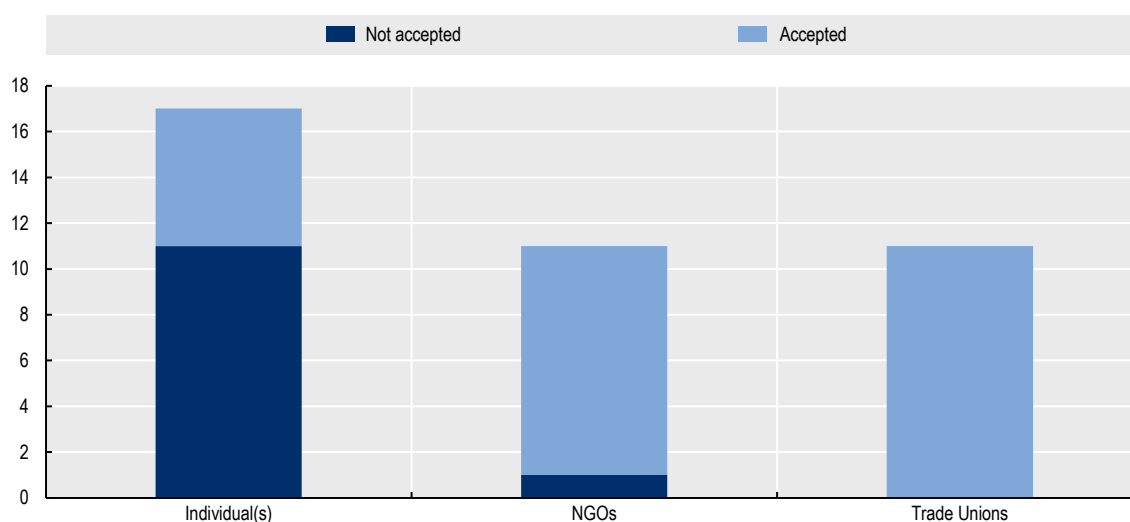
Figure 1.3. Acceptance rate of specific instances (2000-2024)



Note: Only one specific instance was submitted in 2000.

Source: OECD NCP Database (2024)

Figure 1.4. Acceptance status of closed specific instances by stakeholder group



Note: Graph does not include six legacy cases closed by the NCP of New Zealand.

Source: NCP Annual Reporting Questionnaire (2024)

Types of companies involved in specific instances

9. Out of the 52 specific instances closed in 2024 for which the size of the company is known, four (12%) involved small or medium sized enterprises with the remainder involving large enterprises (defined as companies that employ over 250 employees).¹

10. Publicly listed entities were involved in 23 (74%) closed specific instances where such information about the company was available, while non-listed companies were involved in six (19%). Cases also included other types of entities, such as international financial institutions and state-owned enterprises. Information on ownership of 21 companies involved in specific instances is unavailable.

Geography of cases

11. In 21 specific instances, issues arose in the country of the lead NCP handling the specific instance. In 32 (62%) specific instances closed in 2024, issues arose in at least one adherent country. In 20 (38%) specific instances, issues arose in non-adherent countries.

12. In terms of headquarter locations of companies involved in specific instances, no known headquarter locations were in non-adherent countries, compared to 5% in 2023. In four specific instances (10% of cases with known headquarter locations), issues arose in the country of the lead NCP but involved a company headquartered in another Adherent. In eight specific instances (21%) issues arose in the country of the lead NCP involving a company also headquartered in the country of the lead NCP. In three specific instances (8%) the company involved was headquartered in the country of the lead NCP, but the issues arose in another Adherent. In 18 specific instances (46%) the company involved was headquartered in the country of the lead NCP and the issues arose in a non-adherent country.

¹ The most frequent upper limit designating an SME is 250 employees. See OECD Glossary of Statistical Terms, "Small and Medium Sized Enterprises." <https://stats.oecd.org/glossary/detail.asp?ID=3123>

Final statements

13. The Implementation Procedures of the Guidelines provide that NCPs will “At the conclusion of the [specific instance] proceedings and after consultation with the parties involved, make the results of the proceedings publicly available [...]”.² The NCP will therefore issue a final statement “when the NCP decides that the issues raised do not warrant further examination”,³ “when the parties have reached agreement on the issues raised”,⁴ or “when no agreement is reached or when a party is unwilling to participate in the proceedings.”⁵

14. According to the Implementation Procedures of the Guidelines, when no agreement has been reached, the “NCP should also include recommendations on the implementation of the Guidelines where relevant” in the final statement. NCPs may “include recommendations on the implementation of the Guidelines in its statements when an agreement has been reached, as appropriate”⁶

15. In 2024, recommendations were issued in 70% of final statements, and in 78% of final statements where the parties did not reach agreement. One NCP additionally made recommendations in a specific instance that had not been accepted for further examination. This is a slight increase compared to 2023 when 63% of final statements, and 77% of final statements where parties did not reach agreement included recommendations.

16. According to the Implementation Procedures of the Guidelines, “if allowed by applicable law and the NCP’s case-handling procedures, the NCP may, at its own discretion, set out its views in its final statement on whether the enterprise observed the Guidelines.”⁷ These views on the observance of the Guidelines by an enterprise are often referred to as *determinations*.

17. In 2024, determinations were issued in five concluded cases (22% of all cases without agreement). Four cases determined that the company had not observed the Guidelines and one case determined that the company had not observed the Guidelines related to some issues but had observed the Guidelines related to other issues raised. This represents a decrease from 2023 when 36% of cases concluded without agreement led to a determination.

Follow up

18. The Implementation Procedures provide that NCPs will “Engage in follow-up where relevant once the specific instance has closed, on the implementation of recommendations or, if any, the agreement reached by the parties.”⁸ NCPs should note plans for follow up within the final statement, and publish a follow up statement.

19. In 2024, 16 of the 30 (53%) concluded cases with known follow up status included plans for follow up. No follow up was planned in the two cases that were concluded with agreement reached outside of the NCP process. This represents a slight increase compared to 2023 when 50% of final statements referenced plans for follow up.

² Procedures I.C (4)

³ Procedures I.C (4) a.

⁴ Procedures I.C (4) b.

⁵ Procedures I.C (4) c

⁶ Procedures I.C (4) b.

⁷ Procedures I.C (4) c.

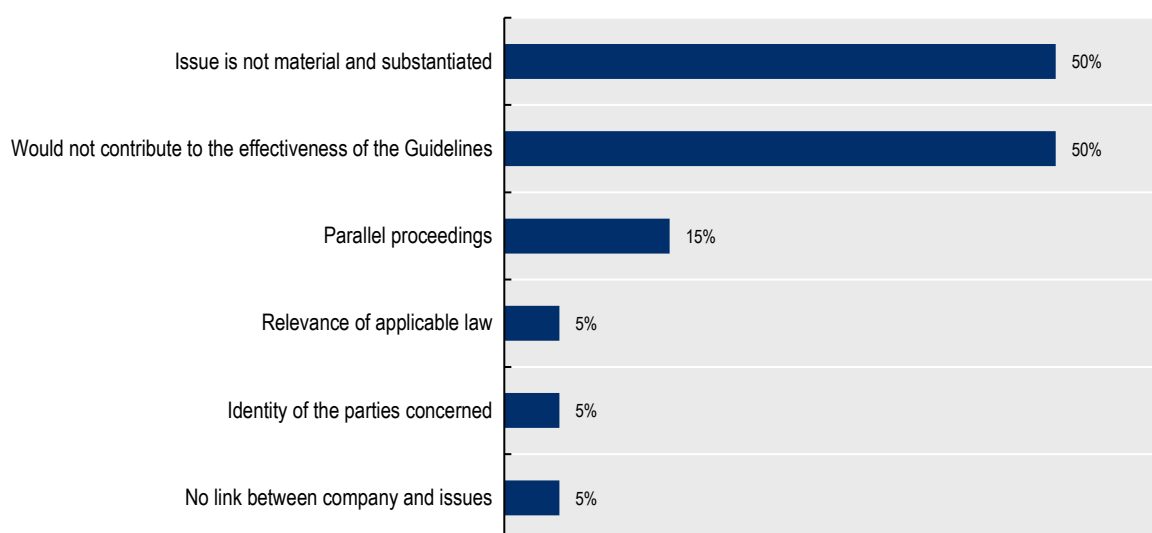
⁸ Procedures I.C (5)

20. Of the ten follow ups conducted in 2024, six (60%) had been completed within one year of the conclusion of the specific instance, and four (40%) were conducted between one and two years of the specific instance conclusion.

Specific instances not accepted for further examination

21. As noted above, 22 specific instances (42%) closed in 2024 were not accepted for further examination. The main criteria for not accepting a specific instance in 2024 were that the issues were not material and substantiated, and that consideration of the specific issues would not contribute to the purposes and effectiveness of the Guidelines, both raised in ten specific instances. Five other criteria were identified as reasons why a specific instance was not accepted (Figure 1.5). In 2023, the main criterion for not accepting specific instances was because the consideration of the specific issue would not contribute to the purposes and effectiveness of the Guidelines.

Figure 1.5. Reasons for non-acceptance of specific instances in 2024



Note: N=20

Source: NCP Annual Reporting Questionnaire (2024)

Duration of procedures

22. The Implementation Procedures provide an indicative timeframe for the five different stages identified in the specific instances procedure. A timeframe of two months is provided for coordination, where relevant, and a timeframe of three months is provided for initial assessment.⁹

23. Of the specific instances concluded in 2024, for which the date of initial assessment is known, the statement was published within three months in one case (4%), a decrease from 15% in 2023. In three specific instances (12%) the initial assessment took 3-6 months. In 13 specific instances (52%) the initial assessment took 6-12 months. In eight specific instances (32%) the initial assessment exceeded one year.

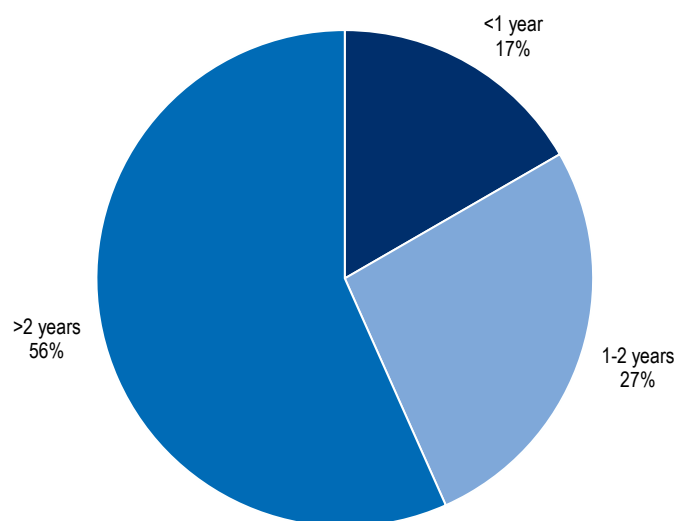
24. The Implementation Procedures provide that “as a general principle, NCPs should strive to conclude the procedure within 12 months (14 months if coordination to determine a lead NCP is needed)

⁹ Commentary, para. 51

from receipt of the specific instance to its conclusion".¹⁰ It is acknowledged that a number of circumstances may warrant extending this timeline.

25. Of the cases concluded in 2024, five (17%) were concluded in less than one year, an increase from 7% in 2023, eight (27%) were concluded between one and two years, and 17 (56%) were concluded in more than two years (Figure 1.6).

Figure 1.6. Timeline from start-to-finish of cases concluded in 2024



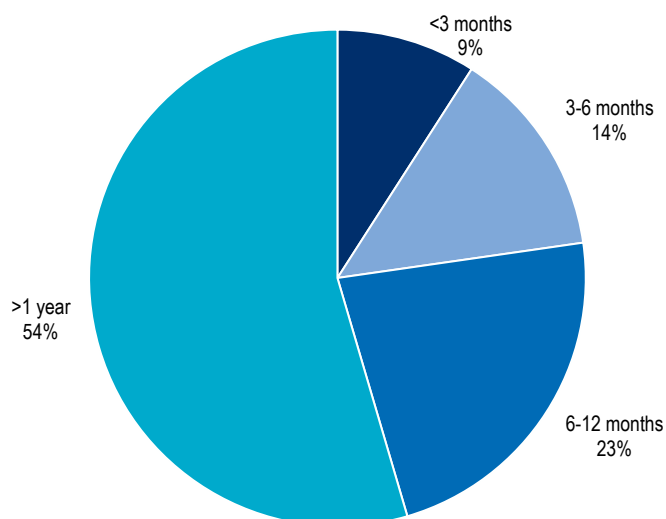
Note: N=30

Source: NCP Annual Reporting Questionnaire (2024)

26. Of the cases not accepted in 2024, two (9%) were closed in less than three months, three (14%) were closed in 3-6 months, five (23%) were closed in 6-12 months, and twelve (54%) cases exceeded on year (Figure 1.7).

¹⁰ Commentary, para. 52

Figure 1.7. Timeline from start-to-finish of cases not accepted in 2024



Note: N=22

Source: NCP Annual Reporting Questionnaire (2024)

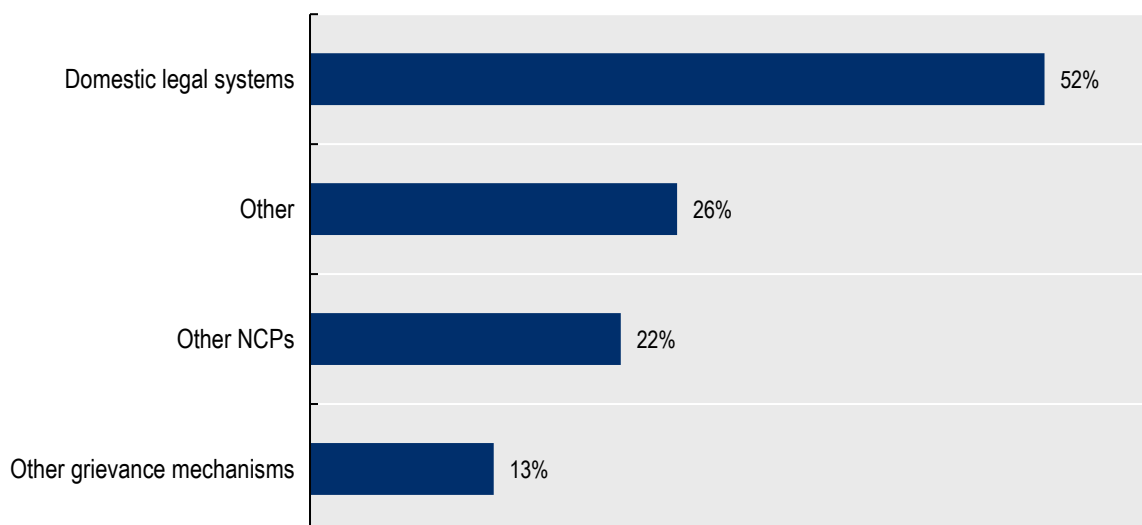
Parallel proceedings in closed specific instances

27. The Implementation Procedures provide that “if parallel proceedings have been conducted, are under way or are available to the parties concerned, this does not preclude the NCP from offering good offices to the parties.”¹¹ However, it is relevant to the NCP procedure to know what other avenues of dialogue the submitting parties may be using, or if they have brought similar issues to a complaint mechanism previously. The presence of parallel proceedings may increase the complexity of the specific instance for the NCP.

28. Twenty-three specific instances (44%) closed in 2024 included reference to some form of parallel proceedings. Of the specific instances that included parallel proceedings, eight (35%) were not accepted. Of these eight cases, three listed parallel proceedings as part of the reason for non-acceptance, but not the sole reason. Parallel proceedings for cases closed in 2024 included domestic legal systems (52%), other forms of parallel proceedings (26%), other NCPs (22%), and other grievance mechanisms (13%) (Figure 1.8).

¹¹ Commentary, para. 35

Figure 1.8. Types of parallel proceedings identified in specific instances closed in 2024



Note: N=23

Source: NCP Annual Reporting Questionnaire (2024)

Summary of closed specific instances

29. An overview of closed specific instances including the lead NCP, host countries, duration, and final outcomes is available in Table 1.1.

Table 1.1. Overview of specific instances closed in 2024

Outcome		Specific instance	Lead NCP	Host country(ies)	Year submitted-closed
Concluded with agreement between parties within the NCP process	1	Individuals, based in DRC & UK-based beverages company	United Kingdom	Democratic Republic of the Congo	2021-2024
	2	Rete legalità per il clima & Company in the hydrocarbon sector	Italy	Italy	2022-2024
	3	Open Society Justice Initiative & Telekom Austria AG	Austria	Belarus	2022-2024
	4	IUF & Lombard Odier	Switzerland	Cambodia	2023-2024
	5	An individual & Flight Network / Gotogate Pty Ltd	Australia	Australia	2023-2024
Concluded with agreement between parties outside of the NCP process	6	Branch Professional Union of Machine Builders & JSC «EPK Stepnogorsk»	Kazakhstan	Kazakhstan	2023-2024
	7	Survival International Italia ETS & an Italian company active in the manufacturing sector	Italy	Paraguay	2023-2024
Concluded without agreement between parties, recommendations issued, determination made	8	ATUMA & Unilever	Netherlands	Democratic Republic of the Congo	2018-2024
	9	Rights and Accountability in Development (RAID), Association des Jeunes Tchadiens de la Zone Pétrolière (AJTZP), and the Public Interest Law Center (PILC) & Glencore	United Kingdom	Chad	2020-2024
	10	The Odoh Family & the Shell Petroleum Development Company of Nigeria Ltd.	Netherlands	Nigeria	2021-2024
	11	Former employees of the joint venture Douala International Terminal S.A (DIT) & A.P. Moeller – Maersk	Denmark	Cameroon	2021-2024

Concluded without agreement between parties, recommendations issued	12	The residents of Batang (Central Java, Indonesia) & Itochu Corporation and Electric Power Development Co., Ltd	Japan	Indonesia	2015-2024
	13	Friends of the Earth Japan (FoE) and Wahana Lingkungan Hidup Indonesia (WALHI) & Marubeni Corporation and JERA Co., Inc	Japan	Indonesia	2017-2024
	14	Conectas and ADERE-MG & Dunkin' Donuts	Brazil	Brazil	2018-2024
	15	Sindicato de Tripulantes de Cabina Lan Express & LATAM	Chile	Chile	2019-2024
	16	Individual & Valeo Autosystemy Sp. z o.o.	Poland	France	2020-2024
	17	Two NGOs & German MNE	Germany	Indonesia	2020-2024
	18	Communications Workers of AmericaCWA, IUE/CWA, AFL-CIO, INDUSTRIALL, UNI & EssilorLuxottica S.A	Italy	United States	2021-2024
	19	An individual on behalf of a community & Barrick Gold / Kibali Mine	Canada	Democratic Republic of the Congo	2022-2024
	20	United Tegar Canada & East Africa Metals	Canada	Ethiopia	2022-2024
	21	United Tegar Canada & Sun Peak Metals Corp.	Canada	Ethiopia	2022-2024
	22	International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) & Fidelity Management & Research Company LLC (Fidelity)	United States	Cambodia	2023-2024
	23	Sindicato ENAP-PETROX & ENAP	Chile	Chile	2023-2024
	24	Services Industrial Professional and Technical Union (SIPTU) & Stryker Corporation	Ireland	Ireland	2023-2023
	25	CNV Internationaal, SOLIFONDS, and Andaychagua Mining and Metal Workers Union of Volcan Compañía Minera & Glencore International AG	Switzerland	Peru	2023-2024
	Concluded without agreement between parties, determination made	26	The General Federation of Labour in Israel (Histadrut) & 10bis and Scoober	Israel	Israel
Concluded without agreement between parties	27	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the construction and financial and insurance activities sectors	New Zealand	New Zealand	2015-2024
	28	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the construction and financial and insurance activities sectors 3	New Zealand	New Zealand	2015-2024
	29	Industrial Trade Union of Mechanical Engineers & LLP «Alstom Kazakhstan»	Kazakhstan	Kazakhstan	2022-2024
	30	Twerwaneho Listeners' Club and Clouds Fm & Holcim SA	Switzerland	Uganda	2023-2024
Not accepted for further examination, recommendations issued	31	User's family & Sacyr Concesiones SpA	Chile	Chile	2020-2024
	32	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the	New Zealand	New Zealand	2015-2024

Not accepted for further examination		construction and financial and insurance activities sectors 4			
	33	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the construction and financial and insurance activities sectors 2	New Zealand	New Zealand	2015-2024
	34	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the financial and insurance activities sector 2	New Zealand	New Zealand	2015-2024
	35	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the financial and insurance activities sector	New Zealand	New Zealand	2015-2024
	36	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the construction sector 2	New Zealand	New Zealand	2015-2024
	37	Wider Earthquake Canterbury Network (WECAN) & an enterprise active in the construction sector	New Zealand	New Zealand	2016-2024
	38	Entrepreneur & Minera Candelaria (Lundin Mining and Sumitomo)	Chile	Chile	2020-2024
	39	Mr. Ananda Subasinghe & Noritake Company Limited and Noritake Lanka Porcelain Limited	Japan	Sri Lanka	2021-2024
	40	One individual & a German company	Germany	India	2022-2024
	41	An individual & a bank	United Kingdom	Democratic Republic of the Congo	2023-2024
	42	André Amisi Rushingwa, Delvaux Bwisibo Mukunda, and Raymond Minani Mugarira & Strategos Group LLC	United States	Democratic Republic of the Congo	2023-2024
	43	Mr. Edouard Teumagnie & European Investment Bank (EIB)	Luxembourg	Cameroon	2023-2024
	44	An individual & "Astana Finance" JSC	Kazakhstan	Kazakhstan	2023-2024
	45	A.M. Trust & UBS AG	Switzerland	Indonesia	2023-2024
	46	An association & a company in the naval sector	Italy	Peru	2023-2024
	47	A natural person and Payoneer Korea, Payoneer INC	Korea, Republic of (South)	Korea, Republic of (South)	2023-2024
	48	Min Byung-kook Tour & Finnair	Korea, Republic of (South)	Finland	2023-2024
	49	Min Byung-kook Tour, Inc. & Finnair	Finland	Iceland	2023-2024
	50	BankTrack, Worth Rises, Coalition for Immigrant Freedom & Swiss National Bank, UBS, HSBC, Barclays	Switzerland	United States	2024-2024
	51	Customer experience management enterprise & Natural person	Chile	Chile	2024-2024
52	An individual & a consulting service in Japan	Japan	Japan	2024-2024	

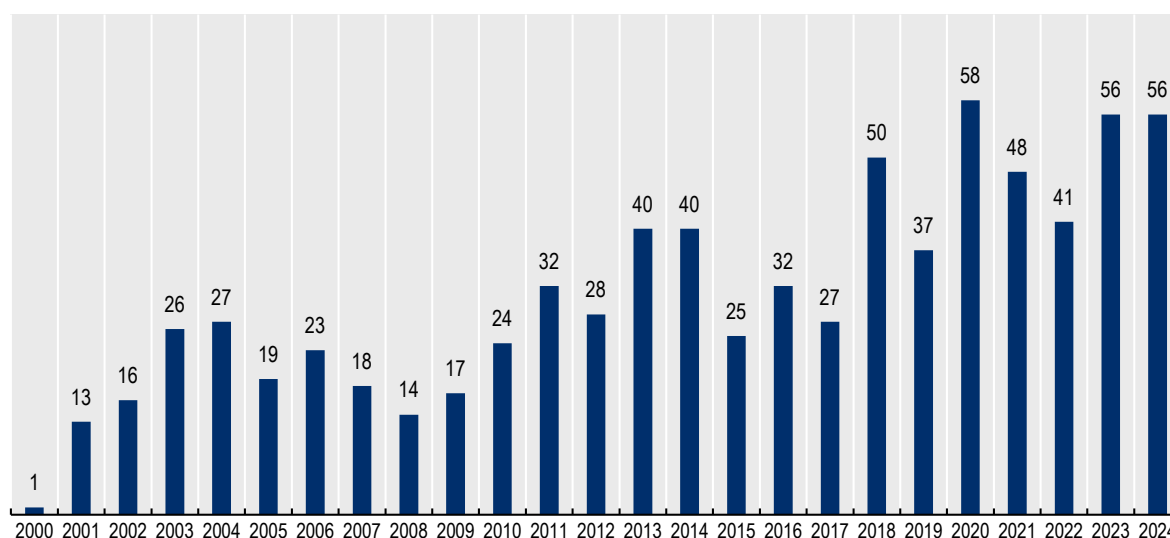
Note: Specific instances are ordered according to the date on which they were received by the NCP.

Source: NCP Annual Reporting Questionnaire (2024)

Trends of new specific instances

30. In 2024, **NCPs received 56 new specific instances**. With 56 new specific instances, 2024 has the second highest number of submissions on record, tied with 2023, and just behind the 58 submissions received in 2020 (Figure 1.9).

Figure 1.9. Number of specific instances submitted annually 2000-2024



Source: NCP Annual Reporting Questionnaire (2024)

31. In 2024, 17 NCPs received specific instances, representing 33% of all NCPs (Table 1.2). The number of NCPs that received new specific instances decreased from 25 (49%) in 2023. As of the end of 2024, the NCPs of Czechia, New Zealand, Portugal, and Slovenia had not received a specific instance in the last five years, and the NCPs of Bulgaria*, Costa Rica, Croatia*, Egypt, Estonia, Greece, Iceland, Jordan, Mauritius*, Romania, Slovak Republic, Tunisia, Ukraine, and Uruguay* had never received a specific instance.¹²

Table 1.2. Number of specific instances received by NCPs in 2024

NCP	Number of specific instances	NCP	Number of specific instances
United Kingdom	11	Canada	2
United States	7	Luxembourg	2
Chile	5	Poland	2
Korea, Republic of (South)	5	Australia	1
Germany	4	Austria	1
Netherlands	4	Denmark	1
France	3	Spain	1
Japan	3	Sweden	1
Switzerland	3		

Note: This table denotes the NCPs to which cases were submitted in 2024. Cases may be reassigned if subsequent coordination arrangements among NCPs warrant it.

Source: NCP Annual Reporting Questionnaire (2024)

32. At the end of 2024, the status of the 56 specific instances was the following: 53 were in progress, three had not been accepted for further examination, and none were concluded.

¹² * Denotes countries that have adhered to the Guidelines within the last five years.

Coordination

33. The Implementation Procedures provide that, in situations where specific instances concern the NCPs of several Adherents, “the NCP(s) that received the specific instance(s) will inform and coordinate with all other concerned NCPs at the outset with the goal of designating the lead and supporting NCPs and adopting coordination arrangements.”¹³

34. Thirty-three specific instances submitted in 2024 (59%) are being, or were being handled with the help of supporting NCPs, an increase from 2023 when 34% of received cases reported coordination.

Host countries

35. Specific instances submitted in 2024 dealt with issues involving companies in 37 different host countries, compared to 31 in 2023. Among these 37 countries, 16 (43%) were countries not adhering to the Guidelines. In 2024, Chile (9 cases), Myanmar (7 cases), and the United States (5 cases) were the most referenced countries in which issues arose.

36. Nineteen specific instances received in 2024 involve NCPs handling issues within their own countries. Thirty-five (63%) specific instances submitted in 2024 address issues arising in at least one of the 52 Adherents and 20 (36%) address issues arising in non-adherent countries. The host country was not identifiable in one specific instance.

Specific instances by industry sector

37. The most prevalent sectors referenced in specific instances submitted in 2024 were financial and insurance activities (27% with 15 submissions), manufacturing (21% with 12 submissions), and mining and quarrying (13% with 7 submissions) (Figure 1.10). This is the second year in a row where financial and insurance activities is the most referenced sector, and 2024 submissions were almost double the historical average yearly number of submissions for the sector.

Figure 1.10. Count of specific instances submitted in 2024 by industry sector



Note: N=56

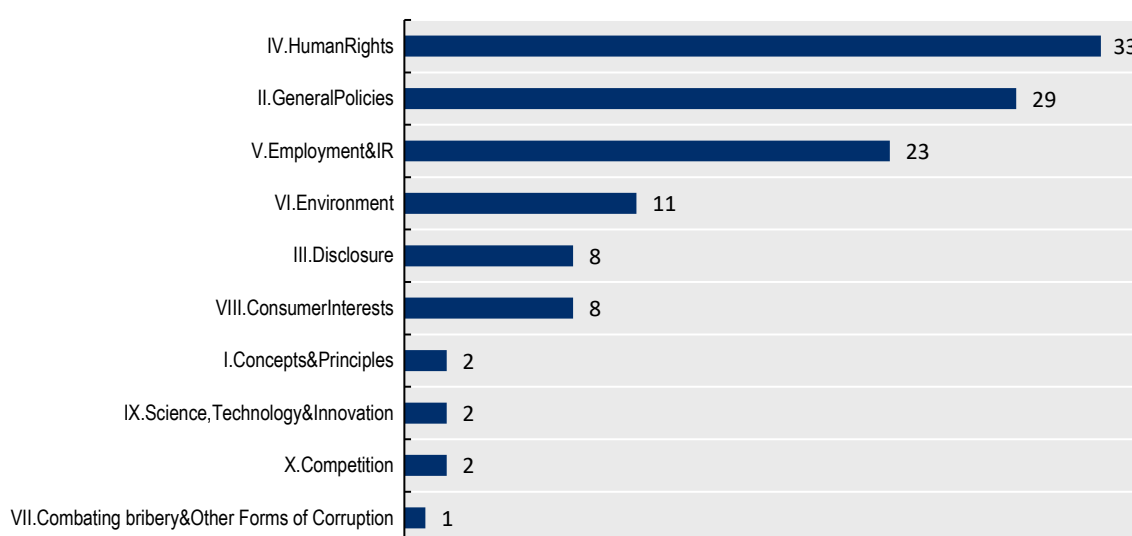
¹³ Commentary, para. 29

Source: NCP Annual Reporting Questionnaire (2024)

Chapters of the Guidelines cited in specific instances

38. The chapter on Human Rights was the most frequently cited chapter in 2024 with 33 specific instances submitted (59%), followed closely by General Policies (which includes recommendations on due diligence) with 29 (52%) submissions. Employment and Industrial Relations was the third most cited chapter with 23 (41%) submissions, followed by Environment with 11 submissions (20%). Other chapters received less than ten submissions each, and Taxation (Chapter XI) did not receive a related submission in 2024 (Figure 1.11). The Human Rights chapter remains the most referenced chapter since its introduction in 2011.

Figure 1.11. Count of specific instances by Guidelines Chapter

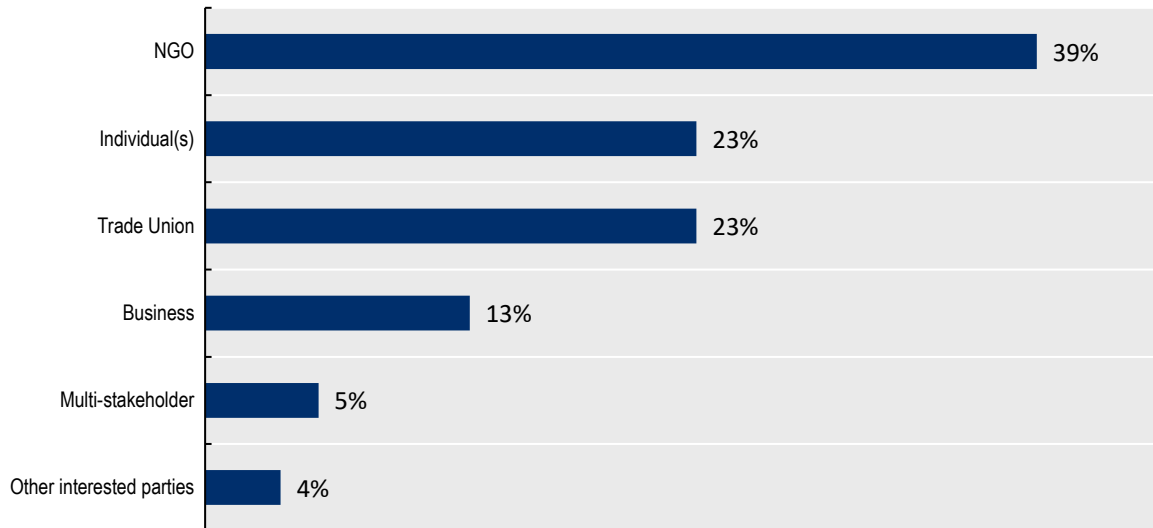


Note: N=53. Data are not mutually exclusive as one specific instance can reference multiple chapters.

Source: NCP Annual Reporting Questionnaire (2024)

Submitters of specific instances

39. NGOs were the primary submitters of specific instances in 2024, accounting for 22 submissions (39%). Individuals and trade unions had the same number of submissions, with 13 (23%) each (Figure 1.12). This is the first time in the last five years that individuals have not made the highest number of submissions to NCPs.

Figure 1.12. Submitters of specific instances in 2024

Note: N=56

Source: NCP Annual Reporting Questionnaire (2024)

2 Promotion

Promotional plans

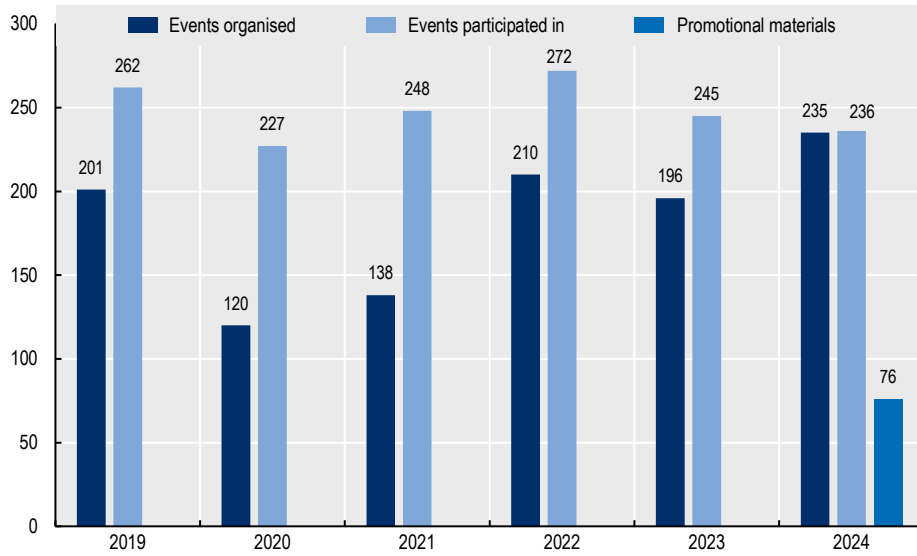
40. A total of 28 NCPs (54%) reported having a promotional plan in place for after 2024, setting out target audiences and activities over the coming years. This is similar to 2023 when 55% of NCPs reported having promotional plans, although this represents the fourth consecutive yearly decrease, down from a high of 65% in 2020.

Promotional events

41. In 2024, 41 NCPs organised or co-organised 235 events. In addition to organising or co-organising events, 35 NCPs reported taking part in a total of 236 events organised by others, during which they participated in presentations, panels, academic lectures, and discussions (Figure 2.1). This represents a slight decrease in the number of NCPs engaging in promotion compared to 2023, when 40 NCPs organised or co-organised events and 38 NCPs participated in events (Figure 2.2). The absolute number of events is higher this year compared to 2023, where 196 events were organized and 245 participated in. In addition, in 2024, 26 NCPs reported 76 promotional materials outside of a traditional events format.

42. Six NCPs did not organise, co-organise, nor participate in any promotional event (Greece, Iceland, Jordan, Tunisia, the Slovak Republic, and Slovenia), compared to six in 2023 (Greece, Israel, Jordan, Mexico, the Slovak Republic, and Slovenia). There is notable overlap between NCPs that do not conduct any promotion and those that have not received specific instances in the last five years. In 2024, all six NCPs that had not engaged in promotional activities had also not received a specific instance in the last five years.

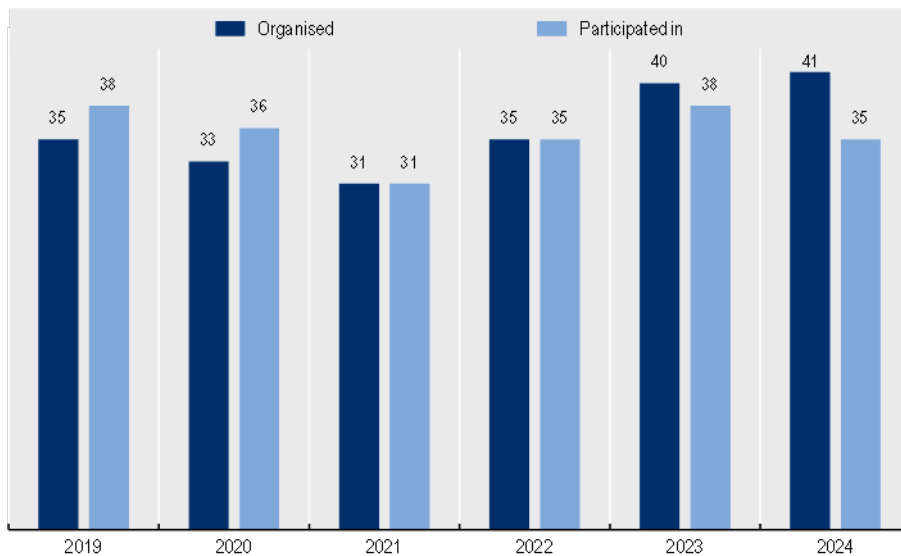
Figure 2.1. Promotional events organised by or involving NCPs (2019-2024)



Note: Since 2024, there has been a separate category for promotional materials, which were sometimes previously included under event promotion.

Source: NCP Annual Reporting Questionnaire (2024)

Figure 2.2. Number of NCPs that organised or participated in events (2019-2024)



Source: NCP Annual Reporting Questionnaire (2024)

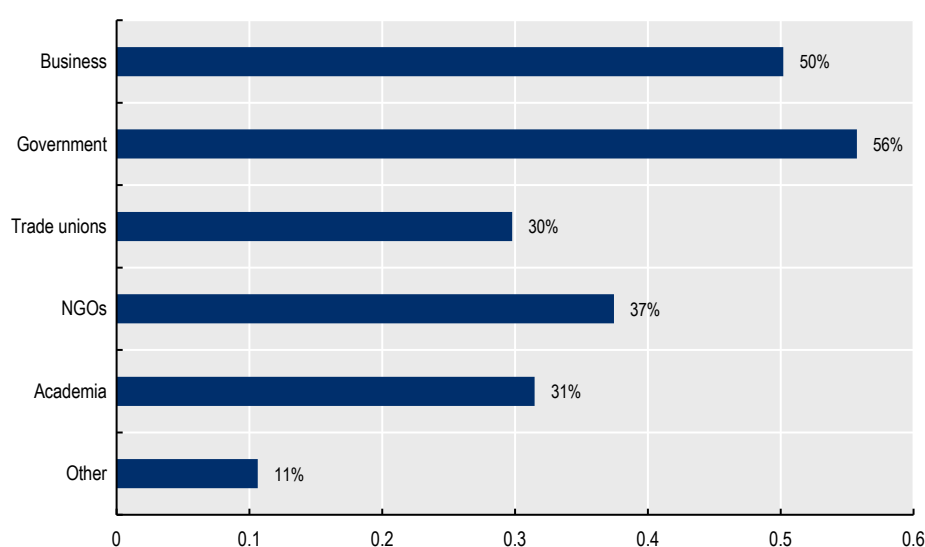
Promotional formats

43. NCPs organised 137 (58%) in-person promotional events, 82 (35%) were held online and 15 (6%) were hybrid. This represents a decrease in in-person events since 2023, when 68% of events were held in-person. Nineteen NCPs (37%) reported having conducted training on the Guidelines aimed at businesses during the year.

Target audiences of NCP promotion

39. In 2024, 41% of reported events organised or co-organised by NCPs were targeted to a multi-stakeholder audience, representing a decrease from 53% in 2023. Government representatives were the most often targeted audience with 56% of events including government as at least one part of the target audience, a decrease from 59% in 2023. Business representatives were second most targeted with 50% of events including business as a target audience (Figure 2.3). Trade unions (30%), NGOs (37%), and Academia (31%), were all included as part of the target audience in just over a third of all events.

Figure 2.3. Target audience at NCP events organised or co-organised by NCPs



Note: N=235

Source: NCP Annual Reporting Questionnaire (2024)

Size of audiences at NCP events

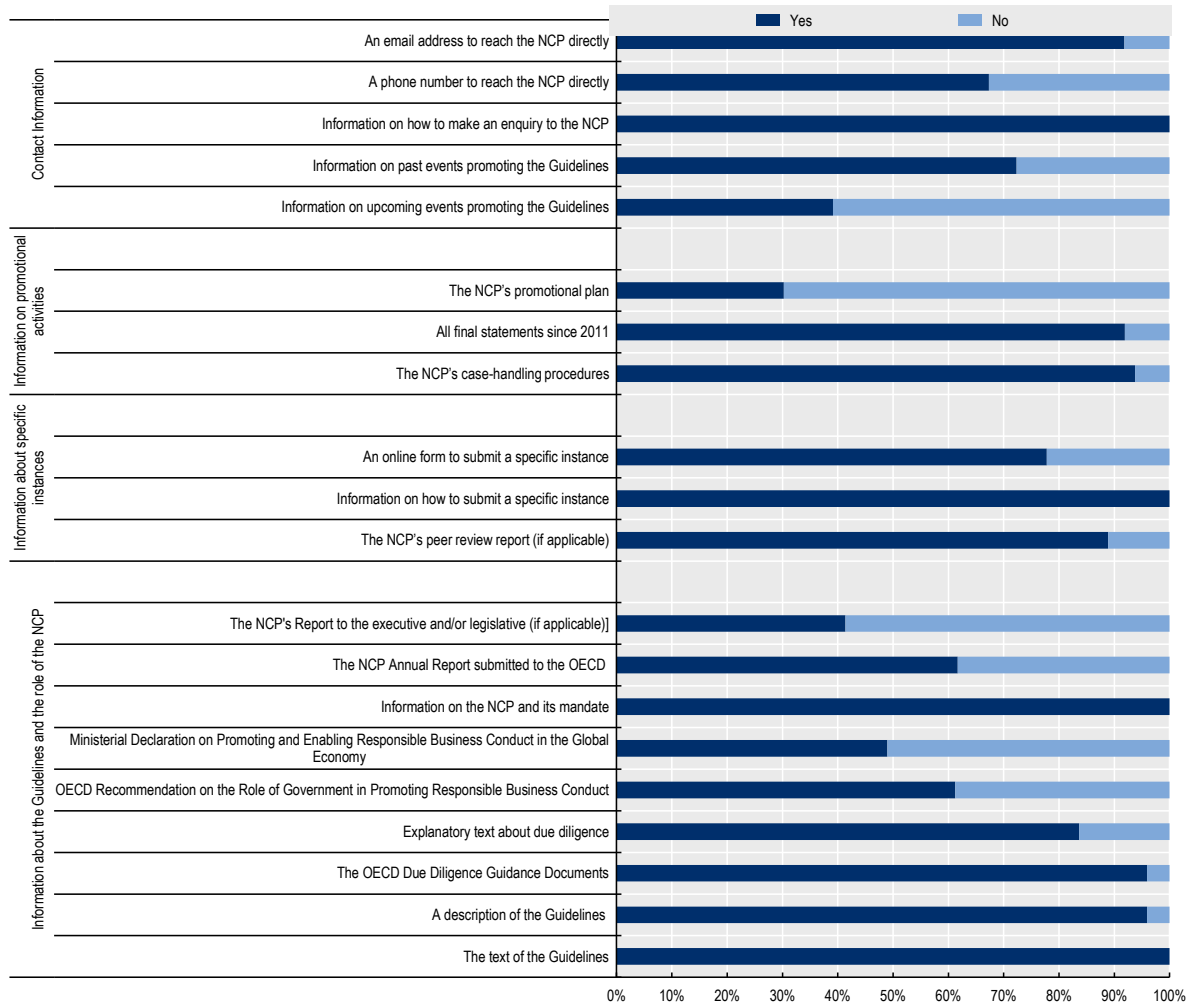
44. In 2024, similarly to 2023, the majority of events organized or co-organized by NCPs had an audience of 10 to 50 participants (45%), followed by events with fewer than 10 participants (28%). Events with 50 to 100 participants and those with over 100 participants accounted for 14% and 10%, respectively. Compared to 2023, the number of events with over 50 participants decreased by 15%, while events with fewer than ten participants more than doubled. Overall, the events organized and participated in by NCPs reached more than 17,000 people in 2024, a decrease compared to approximately 20,000 in 2023.

NCP websites

45. In relation to the core effectiveness criterion of visibility, “NCPs will have a comprehensive website or webpage.”

46. Forty-nine NCPs have dedicated websites or dedicated webpages that provide information about the Guidelines and the NCP. The NCPs of Greece, Jordan and Tunisia do not have dedicated websites or webpages. An overview of the items available on NCP websites is shown in Figure 2.4.

Figure 2.4. Items available on NCP websites



Note: N=52
 Source: NCP Annual Reporting Questionnaire (2024)

Social media

47. Twenty-two NCPs (42%) reported making use of social media for promotion during the year, compared to 59% in 2023. Reported social media included Facebook, Instagram, LinkedIn, X (ex-Twitter), and YouTube. Of the 22 NCPs that reported using social media in 2024, five (23%) reported making 1-5

posts promoting the NCP or the Guidelines, seven (32%) reported making 5-10 posts, five (23%) reported making 10-15 posts, and five (23%) reported making more than 15 promotional posts during the year.

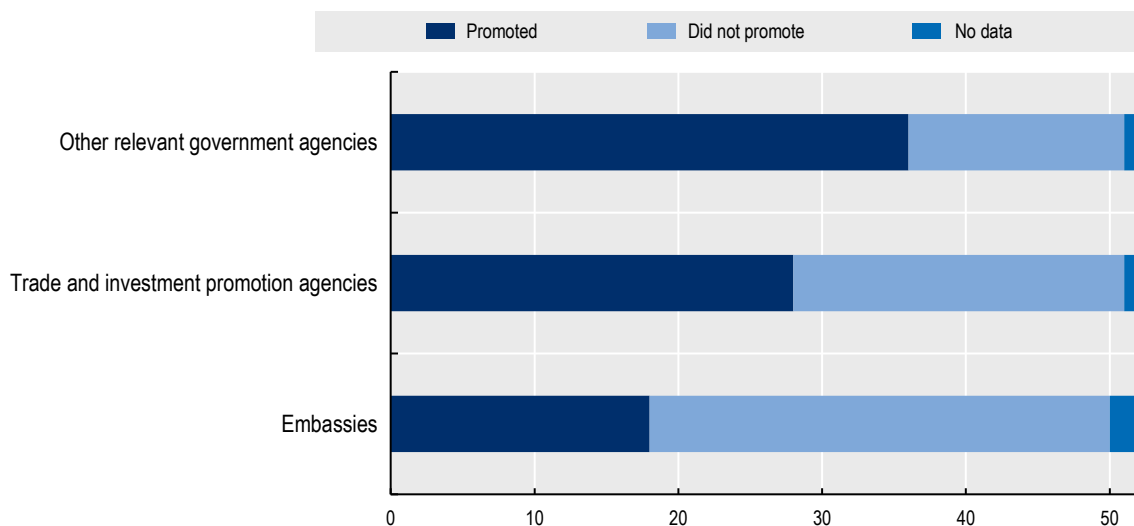
3 Support for government efforts to promote RBC

48. The Decision on the Guidelines provides that NCPs, “where appropriate and in coordination with relevant government agencies, NCPs may also provide support to efforts by their government to develop, implement, and foster coherence of policies to promote responsible business conduct.”¹⁴ The important role of NCPs in fostering policy coherence for RBC was further recognised in the 2022 Recommendation on the Role of Government in Promoting Responsible Business Conduct.¹⁵

Support to government policies to promote RBC

49. Twenty-two NCPs (42%) reported having sufficient resources to provide support for government policies to promote RBC in 2024, compared to 65% in 2023. Thirty-six NCPs (69%) reported promoting the Guidelines to government agencies during the year, 28 (54%) promoted to trade and investment promotion agencies, and 18 (35%) promoted to embassies abroad (Figure 3.1). Twenty-four NCPs (46%) reported promoting the Recommendation on the Role of Government in Promoting RBC among relevant government officials during the year, compared to 37% in 2023.

Figure 3.1. Number of NCPs that promoted the Guidelines to government bodies in 2024



Note: N=52

¹⁴ Decision on the Guidelines, I. 1

¹⁵ See: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0486>

Source: NCP Annual Reporting Questionnaire (2024)

RBC landscape and the role of the NCP

50. In 2024, 29 NCPs (56%) reported involvement in intergovernmental coordination mechanisms regarding policy areas covered by the Guidelines and/or relevant for RBC. These coordination mechanisms related to a variety of workstreams such as the EU-Mercosur agreement, the CSDDD, National Action Plans, environmental initiatives and agreements, and interministerial working groups relating to RBC more generally.¹⁶ In some cases, the NCP itself acted as or led the intergovernmental coordination mechanism.

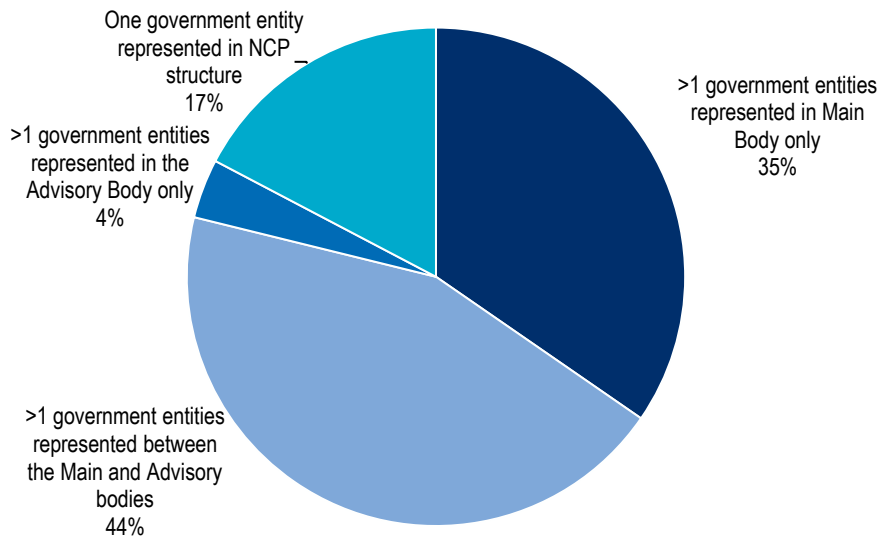
51. In 2024, 29% of NCPs reported that the Guidelines, OECD due diligence instruments, or the Recommendation had been referred to in national regulations or policies adopted during the year. Of these 15 NCPs, two-thirds (67%) reported that the NCP was involved in or consulted during their development. This represents a small decrease from 2023 when 77% reported involvement or consultation in such development. In addition, six NCPs (40%) reported that such adopted instruments make reference to the NCP and/or give a role to the NCP in its implementation.

52. Eighteen NCPs reported that their countries had adopted (4) or were developing (14) National Action Plans (NAPs) on Business and Human Rights or RBC in 2024. In all four adopted NAPs, both the Guidelines and the NCP were referenced in the text of the NAP. One NAP additionally made reference to the OECD due diligence guidance and the Recommendation. NCPs in 78% of the countries having adopted or in the process of developing a NAP reported being involved in its development. This represents a slight decrease from 2023 when 85% of NAPs adopted or in development involved NCP participation. Additionally, 79% of NCPs in the countries with NAPs in development reported that a role was foreseen for them in the implementation of the NAP.

53. As a practice, 43 NCPs (83%) include representatives of more than one government department in their institutional arrangements, either through the secretariat, main membership, or an advisory body. Inclusion of government representatives in NCP institutional arrangements can facilitate policy coherence (Figure 3.2).

¹⁶ The Secretariat maintains a list of regulation referencing the Guidelines. See the OECD Due Diligence Policy Hub: <https://web-archive.oecd.org/2024-06-19/618402-due-diligence-policy-hub.htm>

Figure 3.2. Government representation in NCP structures



Note: N=52

Source: NCP Annual Reporting Questionnaire (2024)

Engagement with relevant officials

54. In 2024, NCPs reported engaging with public procurement officials, trade and investment officials, or SOE officials in the context of:

- A public procurement process (2 NCPs, 4%)
- As part of dedicated events or training (15 NCPs, 29%)
- In another context (18 NCPs, 35%). Other contexts in this regard were reported as the inclusion or related officials in NCP structures, informing relevant units deciding on export credits, NCP peer reviews, and in the context of policy making, such as the elaboration of a NAP.

4 Institutional arrangements

55. As established by the Decision on the Guidelines, while Adherents have flexibility in how to structure their NCP, they are under an obligation to make available human and financial resources to their NCPs so that they can effectively fulfil their responsibilities.¹⁷ NCPs are expected to fulfil their responsibilities in a way that fully meets the core effectiveness criteria, in other words, in a manner that is “visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the Guidelines.”¹⁸

56. In 2024, 35 NCPs (67%) reported having been established through a legislative, regulatory or administrative instrument, compared to 71% in 2023. See Box 4.1 for an overview of legal instruments through which NCPs have been established. Mauritius adhered to the Declaration on International Investment and Multinational Enterprises on 6 September 2024, making it the 52nd NCP.

Box 4.1. Legal basis for the establishment of NCPs

Law

Denmark, Italy, Mauritius.

Decree, order or similar

Austria, Brazil, Bulgaria, Chile, Colombia, Costa Rica, Croatia, Egypt, Finland, Hungary, Kazakhstan, Lithuania, Mexico, Morocco, Netherlands Spain, Switzerland, Ukraine, Uruguay.

Other executive decision

Argentina, Belgium, Canada, Czechia, France, Germany, Korea, Latvia, Peru, Poland, Romania, Slovenia, Sweden.

Source: NCP Annual Reporting Questionnaires (2024)

Overview of NCP structures

57. In 2024, NCPs reported being set up according to the following types of structure:¹⁹

¹⁷ Decision on the Guidelines, I (4)

¹⁸ Procedures, I.

¹⁹ These categories are based on OECD (2018), Structures and Procedures of National Contact Points for the OECD Guidelines for Multinational Enterprises, <https://mneguidelines.oecd.org/Structures-and-procedures-of-NCPs-for-the-OECD-guidelines-for-multinational-enterprises.pdf>. This report maps how Governments have set up their NCPs and how the mechanisms operate and make decisions in relation to their mandates.

- **Single agency NCP:** The NCP is composed of one official in a single ministry, or by a group of officials belonging to the same service in the same ministry.
 - In 2024, there were fifteen single agency NCPs with advisory bodies: Argentina, Austria, Chile, Colombia, Iceland, Ireland, Israel, Italy, Luxembourg, Mexico, New Zealand, Peru, Poland, United Kingdom, and the United States.
 - In 2024, there were four single agency NCPs without advisory bodies: Estonia, Jordan, Türkiye, and Ukraine.
- **Inter-agency NCP:** The NCP is composed of a group of representatives from several ministries or government agencies, usually with the Secretariat located in one of these ministries, composed of one or more officials.
 - In 2024, there were nine inter-agency NCPs with advisory bodies: Canada, Costa Rica, Germany, Hungary, Japan, Romania, Spain, Switzerland and Uruguay.
 - In 2024, there were two inter-agency NCPs without advisory bodies: Brazil and Portugal.
- **Multipartite NCP:** The NCP is composed of a group of government officials and stakeholder representatives, usually with a Secretariat located in one of the government agencies represented in the NCP.
 - In 2024, there were fourteen multipartite NCPs. Seven were tripartite (Belgium, Egypt, France, Morocco, Kazakhstan, Sweden and Tunisia) and seven were quadripartite (Bulgaria, Croatia, Czechia, Finland, Latvia, Slovak Republic and Slovenia).
- **Expert-based NCPs:** The NCP is composed of experts who are appointed by, but external to, the government. These NCPs are generally set up as entities independent of the government, although they are dependent upon the government for funding and for their Secretariat, based in a government agency. Experts may be required to act in a personal capacity and not to represent particular interests or on the contrary may represent the views of the organisations that nominated them.
 - In 2024, there were four expert-based NCPs: Denmark, Lithuania, Netherlands, and Norway.
- **Hybrid NCPs:** The NCP is composed of elements derived from more than one model.
 - The NCPs of Australia, Korea and Mauritius²⁰ were set up under a hybrid structure composed of elements derived from different models above, namely single-agency and expert-based (Australia), or multipartite and expert-based (Korea).

58. The NCP of Greece is currently working to define a structure following a shift in competent authority for the NCP function.

59. Each Adherent can also decide on the location of its NCP, bearing in mind the core criteria for functional equivalence. This location is either that of the NCP itself (for single-agency NCPs) or, for NCPs that are set up as committees meeting intermittently (inter-agency, multipartite, expert-based), the location of their permanent office or Secretariat handling the daily management of NCP affairs (receiving inquiries and specific instances, organising or participating in promotional events or promoting policy coherence, preparing NCP decisions, etc.):

- Twenty-three NCPs (44%) were located in Ministries with an economic portfolio (i.e. Ministries of Economy, Trade, Investment, Industry, Business, etc.);
- Nine NCPs (17%) were located in Ministries of Foreign Affairs;
- Seven NCPs (13%) were located in Trade and/or Investment Promotion Agencies; and
- Four NCPs were located at other locations.

- The Icelandic NCP is hosted by the Ministry of Culture and Business, the Korean NCP is hosted by a private entity (the Korea Commercial Arbitration Board) and the Polish NCP is hosted by the Ministry of Development Funds and Regional Policy.
- The NCP of Croatia has a secretariat split between the Ministry of Foreign and European Affairs and Ministry of Economy and Sustainable Development.

Case-handling procedures

60. The Procedures of the Guidelines provide that “NCPs will publish their case-handling procedures, i.e. procedures they follow in handling specific instances [...]”, and “NCPs are encouraged to consult their stakeholders in developing their case-handling procedures.”²¹

61. In 2024, 46 NCPs reported having case-handling procedures (C-HPs) in place, of which 42 were available online. Moreover, 21 NCPs modified their C-HPs. All 21 NCPs reported that their modified C-HPs were in line with the 2023 Guidelines, and 15 of the 21 reported a stakeholder consultation in the update. In general, between 2023 and 2024, 22 NCPs have modified their case handling procedures to align with the 2023 Guidelines, representing 42% of all NCPs. An additional 17 NCPs reported plans to update their C-HPs in the first half of 2025.

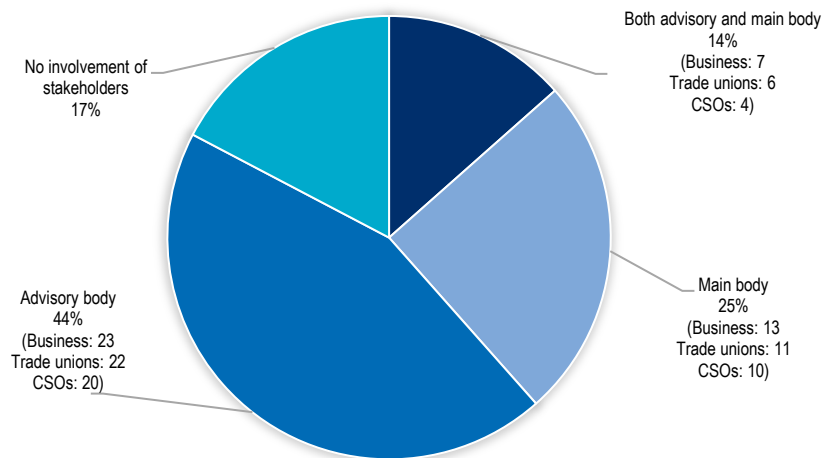
Stakeholders as part of the institutional arrangements of NCPs

62. In 2024, 33 NCPs (63%) reported having one or more advisory bodies, compared to 29 NCPs (57%) in 2023. Of these, three consisted only of members from different government agencies. Ten NCPs (19%) indicated that their advisory body met once in 2024, ten (19%) met twice, two (4%) met three times, one (2%) met four times, two (4%) met more than four times, and seven (13%) indicated that the advisory body did not meet in 2024. One NCP with two advisory bodies reported that the multistakeholder body met four times in 2024, the interagency body met three times, and the two had one joint meeting. Ten NCPs additionally reported that their advisory bodies provided an oversight function (Australia, Austria, Bulgaria, Chile, Hungary, Mauritius, New Zealand, Spain, Switzerland and the United Kingdom).

63. In 2024, 83% of NCPs included stakeholders in their institutional arrangements, as compared to 80% in 2023. Stakeholders were included in the main bodies of 13 NCPs, in the advisory bodies of 23 NCPs, and in both bodies in 7 NCPs. Forty-three NCPs involved business representatives in their structures, thirty-nine NCPs included trade unions, and thirty-four involved civil society.

²¹ Procedures, I. C.

Figure 4.1. Stakeholder involvement in NCPs' institutional arrangements



Note: N=52

Source: NCP Annual Reporting Questionnaire (2024)

NCP resources

64. The 2023 Declaration on Promoting and Enabling Responsible Business Conduct in the Global Economy²² reiterates the commitment to having fully functional and adequately resourced NCPs.

65. In 2024,

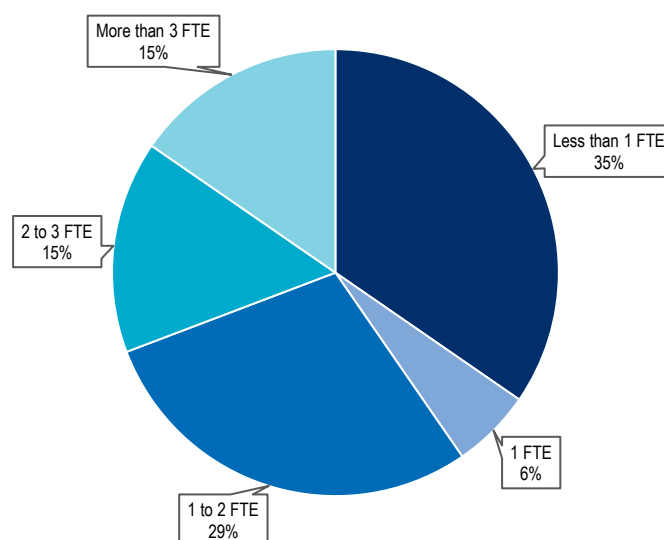
- 15 NCPs reported having staff working both full-time and part-time on NCP matters (compared to 13 in 2023)
- 8 NCPs reported only having staff working full-time on NCP matters (compared to 8 in 2023)
- 28 NCPs reported having only staff working part-time on NCP matters (compared to 23 in 2023)
- The NCP of Greece did not have dedicated staff in 2024.

66. The absolute number of NCP staff members (full-time and part-time) increased to 171 in 2024, compared to 161 in 2023. Many NCPs continue to rely mostly on part-time staff, some of which are unable to dedicate more than 5% of their time to the NCP function. Many NCPs have staff that come in to support only on an *ad hoc* basis. It is therefore difficult to draw conclusions regarding the level of resources available to NCPs from variations in absolute staff numbers. Not considering turnover, NCPs reported the following staff resources in 2024 (Figure 4.2):

- 18 NCPs (35%) had less than 1 full time-equivalent (FTE) staff (<1), compared to 35% in 2023,
- 3 NCPs (6%) had 1 FTE staff (=1), compared to 8% in 2023,
- 15 NCPs (29%) had between 1 and 2 FTE staff (>1 to =2), compared to 23% in 2023,
- 8 NCPs (15%) had between 2 and 3 FTE staff (>2 to =3), compared to 20% in 2023,
- 8 NCPs (15%) had more than 3 FTE staff (>3), compared to 14% in 2023.

²² See: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0489>

Figure 4.2. FTE staff resources available to the NCP Network in 2024



Note: N=52

Source: NCP Annual Reporting Questionnaire (2024)

67. In terms of staff turnover, in 2024 58% of NCPs reported some form of staff turnover (loss and/or gain of full- or part-time staff), compared to 65% in 2023. Namely, twenty-eight NCPs reported that a total of 32 new staff members (14 full-time and 28 part-time) had joined, and twenty-six NCPs reported that a total of 34 staff members (14 full-time and 20 part-time) had left.

68. This means that in 2024, the NCP Network relied on a staff where 26% of the members had joined the NCP function during that year, compared to 27% in 2023.

69. Regarding financial resources in 2024:

- 22 NCPs (42%) had access to a dedicated budget for their activities, compared to 45% in 2023.
- Out of the 28 NCPs that did not have access to a specific budget, 16 reported that financial resources were available on an ad hoc basis for promotional activities, and eight reported that financial resources were available on an ad hoc basis for specific instances. Seven NCPs reported financial resources available on an ad hoc basis for both promotional activities and specific instances.

70. With regards to whether human and financial resources were sufficient to cover various activities, twenty-one (40%) NCPs indicated that they did not have sufficient resources to deliver all their responsibilities effectively, compared to 45% in 2023. In particular:

- five NCPs did not have enough resources to handle specific instances in a timely manner (compared to eleven in 2023),
- two did not have enough resources to organise promotional activities (compared to eight in 2023),
- four did not have sufficient resources to allow it provide support to government efforts relating to RBC,
- five could not attend NCP meetings at the OECD (compared to one in 2023),
- eight did not have enough resources to attend events organised by other NCPs (compared to seven in 2023).

Reporting

71. As part of the core effectiveness criteria, NCPs are required to be accountable. The Implementation Procedures of the Guidelines provide that “Each NCP will report annually to the Committee and the WPRBC.”²³

72. In 2024:

- Forty NCPs reported on their activities to their government, and thirteen reported to parliament.
- All 52 adherents reported on their activities in 2024 to the OECD. This is therefore the second year in a row all adherents have submitted their yearly activities report to the OECD.

Attendance to meetings of the Network of NCPs

73. NCPs are required to meet regularly to share experience, in particular by attending the two annual meetings of the NCP Network at the OECD.

74. The June 2024 NCP meeting was organised virtually and the November 2024 meeting was held in hybrid format. A total of 42 NCPs attended the meeting of the NCP Network in June and 51 NCPs attended the meeting in November, compared to 42 NCPs present at the June 2023 meeting, and 45 NCPs present at the November 2023 meeting. One NCP (Uruguay) did not attend either of two NCP meetings in 2024, compared to five in 2023 (Jordan, Latvia, Slovenia, Tunisia, and Uruguay) and four in 2022 (Finland, Greece, Slovenia, and Uruguay). Therefore, the NCP of Uruguay was absent from NCP meetings for three consecutive years.

²³ Procedures, I. E. (1)

5 Peer reviews, capacity building and peer learning

Peer reviews

75. Peer reviews are a unique opportunity for governments to learn from others and review the practices of their NCPs through a systematic process. They have been voluntary, but in recognition of their importance, at the June 2017 OECD Ministerial Council Meeting (MCM), governments committed “to having fully functioning and adequately resourced National Contact Points, and to undertake a peer learning, capacity building exercise or a peer review by 2021, with a view to having all countries peer reviewed by 2023.” The 2023 updated Guidelines then introduced that NCPs will be required to undertake their peer review from 2025 onwards under a new system of mandatory and periodic peer reviews. Modalities for the new system were adopted by the WPRBC in 2024 [DAF/INV(2024)31].

76. In 2024, the WPRBC discussed the final reports of seven NCPS, compared to eight in 2023:

- Estonia, Hungary, Kazakhstan, and Türkiye at the March WPRBC meeting,
- Iceland and Romania at the June WPRBC meeting,
- Finland at the November WPRBC meeting.

77. In 2024, nine NCPs reported to the WPRBC on progress made one year following the initial presentation of their peer review reports to the WPRBC:

- Slovenia (second time reporting back) at the March WPRBC meeting,
- Luxembourg, Morocco, New Zealand, and Peru at the June WPRBC meeting,
- Czechia, Latvia, Portugal, and the Slovak Republic²⁴ at the November WPRBC meeting.

78. Overall, 19% of the NCP Network was directly engaged in peer review visits during the year, with three NCPs undergoing their peer review and seven peer reviewer NCPs (Table 5.1).

Table 5.1. Peer review visits organised in 2024

NCP under review	Visit date	Peer reviewer NCPs
Romania	March	Kazakhstan, Portugal, Spain
Finland	May	Denmark, Ireland
Israel	November	Latvia, Netherlands

²⁴ The Slovak NCP was asked to report back again in March 2025.

79. At the end of 2024, 44 NCPs had been peer reviewed,²⁵ and one peer review was ongoing (Table 5.2). Seven countries did not undergo a peer review of their NCP during the voluntary cycle, including three OECD members (Colombia, Greece and Mexico)

Table 5.2. State of affairs of peer reviews as of the end of 2024

2024 additionally marks the end of onsite visits under the voluntary peer review system.

Peer review complete	On-site visit complete in 2024	Did not undergo peer review
Argentina	Israel	Colombia
Australia		Egypt
Austria		Greece
Belgium		Jordan
Brazil		Mexico
Bulgaria*		Tunisia
Canada		Ukraine
Chile		
Costa Rica*		
Croatia*		
Czechia		
Denmark		
Estonia		
Finland		
France		
Germany		
Hungary		
Iceland		
Ireland		
Italy		
Japan		
Kazakhstan		
Korea		
Latvia		
Lithuania*		
Luxembourg		
Mauritius*		
Morocco		
Netherlands		
New Zealand		
Norway		

²⁵ This includes NCPs that adhered recently and underwent extensive capacity building as part of the process of accession to the OECD or adherence to the Guidelines.

Peru		
Poland		
Portugal		
Romania		
Slovak Republic		
Slovenia		
Spain		
Sweden		
Switzerland		
Türkiye		
United Kingdom		
United States		
Uruguay*		

Note: *Underwent significant reviews as part of the process of accession to the OECD or capacity building exercises for the NCP pursuant to adherence to the Guidelines. Uruguay, Croatia and Mauritius were not included in the peer review cycle due to becoming Adherents less than five years ago.

Source: <https://mneguidelines.oecd.org/ncppeerreviews.htm>

Action Plan to Strengthen NCPs (2022-2024)

80. In 2024, the Network of NCPs held its biannual meetings in June (virtual) and November (in person at the OECD Headquarters in Paris). During these meetings, and on other occasions, NCPs continued to implement the Action Plan to Strengthen National Contact Points for Responsible Business Conduct (2022-2024), with the support of the Secretariat. The 2022-2024 Action Plan contained four overarching objectives, and was supported by regional networks of NCPs. The four objectives were as follows:

- Peer review the entire NCP Network
- Visibility, stakeholder engagement and confidence
- Efficient and effective handling of specific instances
- Providing access to expertise in the NCP Network

81. Activities related to peer reviews were discussed in the above section. Other activities and results achieved include the following.

Visibility, stakeholder engagement and confidence

82. A stakeholder consultation between NCPs and Business at OECD, TUAC and OECD Watch took place at the November meeting of the NCP Network. Additionally, the activities marked with an asterisk* below were held in the presence of stakeholders.

Effective and efficient handling of specific instances

83. At the June meeting of the NCP Network:

- NCPs attended a workshop on RBC and grievance mechanisms in the world of sport, facilitated by experts from the Centre for Sport and Human Rights*
- NCPs discussed an updated Good Offices Manual, recording good practice with regard to the conduct of good offices, with a focus on mediation*

84. At the November meeting of the NCP Network:

- NCPs discussed how to protect personal data of parties to specific instances in their reporting to the OECD
- NCPs held a confidential cases session, during which they discussed and provided each other guidance on complex issues they are facing in the handling of specific instances

Providing access to expertise in the NCP Network

85. At the November meeting of the NCP Network:

- NCPs attended a workshop on RBC and conflict or high-risk situations, involving experts from the OECD Secretariat and from the TrustWorks company*
- NCPs received a briefing from OECD experts on RBC, due diligence and anti-corruption, based on a new infographic produced by the Secretariat on "[Unpacking Supply Chain Due Diligence for Integrity](#)"*
- NCPs discussed the implications for their work of the adoption by the European Union of the Corporate Sustainability Due Diligence Directive.

Regional networks of NCPs

86. Regional networks of NCPs met in the margins of the November 2024 meeting of the Network of NCPs.

Action Plan to Strengthen NCPs (2025-2027)

87. A new Action Plan to strengthen NCP was updated in 2024 and will take effect at the start of 2025 [[DAF/INV\(2024\)33/FINAL](#)]. The New Action Plan is articulated around the following priorities:

- Consolidation: Building on and leveraging existing materials to address current needs
- Compatibility: Implementing the updated Guidelines and Implementation Procedures
- Closing the gap: Addressing gaps in the achievement of core effectiveness criteria where needed.

Annex A. Overview of NCP data

Country	>=1 FTE	Website	Case-handling procedures	Received >=1 specific instances in the last five years	Engaged in promotional activity	Attended at least one NCP meeting
Argentina	NO	YES	YES	YES	YES	YES
Australia	YES	YES	YES	YES	YES	YES
Austria	YES	YES	YES	YES	YES	YES
Belgium	YES	YES	YES	YES	YES	YES
Brazil	YES	YES	YES	YES	YES	YES
Bulgaria*	YES	YES	YES	NO	YES	YES
Canada	YES	YES	YES	YES	YES	YES
Chile	YES	YES	YES	YES	YES	YES
Colombia	YES	YES	YES	YES	YES	YES
Costa Rica	YES	YES	YES	NO	YES	YES
Croatia*	YES	YES	YES	NO	YES	YES
Czechia	YES	YES	YES	NO	YES	YES
Denmark	YES	YES	YES	YES	YES	YES
Egypt	YES	YES	YES	NO	YES	YES
Estonia	NO	YES	YES	NO	YES	YES
Finland	NO	YES	YES	YES	YES	YES
France	YES	YES	YES	YES	YES	YES
Germany	YES	YES	YES	YES	YES	YES
Greece	NO	NO	NO	NO	NO	YES
Hungary	YES	YES	YES	YES	YES	YES
Iceland	NO	YES	NO	NO	NO	YES
Ireland	YES	YES	YES	YES	YES	YES
Israel	YES	YES	YES	NO	YES	YES
Italy	YES	YES	YES	YES	YES	YES
Japan	YES	YES	YES	YES	YES	YES
Jordan	NO	NO	NO	NO	NO	YES
Kazakhstan	YES	YES	YES	YES	YES	YES
Korea	YES	YES	YES	YES	YES	YES
Latvia	NO	YES	YES	YES	YES	YES
Lithuania	NO	YES	YES	YES	YES	YES
Luxembourg	YES	YES	YES	YES	YES	YES
Mauritius*	YES	YES	YES	NO	YES	YES
Mexico	YES	YES	YES	YES	YES	YES
Morocco	NO	YES	YES	YES	YES	YES
Netherlands	YES	YES	YES	YES	YES	YES
New Zealand	YES	YES	YES	NO	YES	YES
Norway	YES	YES	YES	YES	YES	YES
Peru	YES	YES	YES	YES	YES	YES

Poland	YES	YES	YES	YES	YES	YES
Portugal	YES	YES	YES	NO	YES	YES
Romania	NO	YES	NO	NO	YES	YES
Slovak Republic	NO	YES	NO	NO	NO	YES
Slovenia	NO	YES	YES	NO	NO	YES
Spain	NO	YES	YES	YES	YES	YES
Sweden	NO	YES	YES	YES	YES	YES
Switzerland	YES	YES	YES	YES	YES	YES
Tunisia	NO	YES	NO	NO	NO	YES
Türkiye	YES	YES	YES	YES	YES	YES
Ukraine	NO	YES	NO	NO	YES	YES
United Kingdom	YES	YES	YES	YES	YES	YES
United States	YES	YES	YES	YES	YES	YES
Uruguay*	NO	YES	YES	NO	YES	NO

Note: *countries that have adhered to the Guidelines in the last five years.

Source: NCP Annual Reporting Questionnaire (2024)

Annex B. Comprehensive overview of NCPs

Country	Structure & location					Resources						Reporting		Case-handling procedures			Promotional plan	Promoted Guidelines to:			# promotion			NCP meeting attendance	
	Structure	Advisory body	Struct. Includes business	Struct. Includes trade unions	Struct. Includes NGOs	Total FTE staff	Full time	Part time	Joined 2024	Left 2024	Dedicated budget	Government	Parliament	In place	Online	Revised 2024		Business	Trade unions	NGOs	Organised	Participated in	Materials	June	November
Argentina	Single agency	Yes	Yes	Yes	Yes	0.95		4		1	No	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	2			Yes	Yes
Australia	Hybrid	Yes	Yes	Yes	Yes	3.7	3.6	1	1	1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	4	3	1	Yes	Yes
Austria	Single agency	Yes	Yes	Yes	Yes	2.3	1	2	1	1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	11	4	1	Yes	Yes
Belgium	Multipartite	Yes	Yes	Yes	Yes	1	1	2			No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	1	1		Yes	Yes
Brazil	Inter agency	No	No	No	No	3.3	3	1	1	1	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	3	2		Yes	Yes
Bulgaria*	Multipartite	Yes	Yes	Yes	Yes	1.3		2			Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	4	6	3	Yes	Yes
Canada	Inter agency	Yes	Yes	Yes	No	2	2				No	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	4	5	2	Yes	Yes
Chile	Single agency	Yes	Yes	Yes	Yes	3.5	3	1		1	Yes	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	36	17	2	Yes	Yes
Colombia	Single agency	Yes	Yes	Yes	Yes	1.5	1	1	1		Yes	No	No	Yes	Yes	No	No	Yes	No	Yes	9	5		Yes	Yes
Costa Rica	Inter agency	Yes	Yes	No	Yes	1.3		2			Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	Yes	17	28		Yes	Yes
Croatia*	Multipartite	No	Yes	Yes	Yes	2.75	2	2	1	1	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	2	7	5	Yes	Yes

Country	Structure & location					Resources					Reporting		Case-handling procedures			Promotional plan	Promoted Guidelines to:			# promotion			NCP meeting attendance		
	Structure	Advisory body	Struct. Includes business	Struct. Includes trade unions	Struct. Includes NGOs	Total FTE staff	Full time	Part time	Joined 2024	Left 2024	Dedicated budget	Government	Parliament	In place	Online		Revised 2024	Business	Trade unions	NGOs	Organised	Participated in	Materials	June	November
Czechia	Multipartite	No	Yes	Yes	Yes	1.43		4			No	No	No	Yes	Yes	Yes	Yes	No	No	1	1	1	Yes	Yes	
Denmark	Expert based	No	Yes	Yes	Yes	2	2		1	1	Yes	Yes	No	Yes	No	No	No	Yes	Yes	Yes	1		1	Yes	Yes
Egypt	Multipartite	Yes	Yes	Yes	Yes	2		4	3	1	No	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	2	3		No	Yes
Estonia	Single agency	No	No	No	No	0.1		1			No	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	5	3	1	Yes	Yes
Finland	Multipartite	No	Yes	Yes	Yes	0.4		2			No	Yes	No	Yes	Yes	Yes	No	No	No	No	2	7		Yes	Yes
France	Multipartite	No	Yes	Yes	No	1.75	1.5	1			Yes	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	10	10	2	No	Yes
Germany	Inter agency	Yes	Yes	Yes	Yes	2.27	1	4	2	3	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	2	2	4	Yes	Yes
Greece	Other	No	No	No	No						No	No	No	No			No	No	No	No				Yes	Yes
Hungary	Inter agency	Yes	Yes	Yes	Yes	1		2			No	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes		2	2	No	Yes
Iceland	Single agency	Yes	Yes	Yes	Yes	0.5		3		1	No	Yes	No	No			No	Yes	No	Yes				Yes	Yes
Ireland	Single agency	Yes	Yes	Yes	Yes	3.1	2	3	1	2	No	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	3		3	Yes	Yes
Israel	Single agency	Yes	Yes	Yes	No	1.75	1	2		1	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	1			Yes	Yes
Italy	Single agency	Yes	Yes	Yes	Yes	3.7	2	5	1	3	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	1	3		Yes	Yes
Japan	Inter agency	Yes	Yes	Yes	No	1.925		11	3	3	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	2			Yes	Yes
Jordan	Single agency	No	No	No	No	0.1		1			No	Yes	No	No			No	No	No	No				Yes	Yes
Kazakhstan	Multipartite	No	Yes	No	Yes	3	3				Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	15	9	1	Yes	Yes
Korea	Hybrid	No	No	No	No	3	3		2	2	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	5	4	7	Yes	Yes
Latvia	Multipartite	No	Yes	Yes	Yes	0.45		2	1	1	No	No	No	Yes	Yes	No	No	Yes	Yes	Yes	1	2		Yes	Yes

Country	Structure & location					Resources						Reporting		Case-handling procedures			Promotional plan	Promoted Guidelines to:			# promotion			NCP meeting attendance	
	Structure	Advisory body	Struct. Includes business	Struct. Includes trade unions	Struct. Includes NGOs	Total FTE staff	Full time	Part time	Joined 2024	Left 2024	Dedicated budget	Government	Parliament	In place	Online	Revised 2024		Business	Trade unions	NGOs	Organised	Participated in	Materials	June	November
Lithuania	Expert based	Yes	Yes	No	No	0.5		1			Yes	Yes	No	Yes	No	No	No	Yes	No	Yes	1		2	Yes	Yes
Luxembourg	Single agency	Yes	Yes	Yes	Yes	2	2				No	Yes	No	Yes	Yes	No		Yes	Yes	Yes	12	8		Yes	Yes
Mauritius*	Hybrid	Yes	Yes	Yes	Yes	1		4			Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	1	1	5	No	Yes
Mexico	Single agency	Yes	No	No	No	1.25		3	1	2	No	Yes	No	Yes	Yes	No	Yes	No	No	No			1	No	Yes
Morocco	Multipartite	Yes	Yes	Yes	No	0.6		3	1		Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	6	9	3	Yes	Yes
Netherlands	Expert based	Yes	Yes	Yes	Yes	4	4		1		Yes	Yes	Yes	Yes	Yes	Yes		Yes	Yes	Yes	3	8		Yes	Yes
New Zealand	Single agency	Yes	Yes	Yes	No	0.6		2			No	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes		2	3	Yes	Yes
Norway	Expert based	No	Yes	Yes	Yes	3	3	0	2	2	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9	22	1	Yes	Yes
Peru	Single agency	Yes	Yes	Yes	Yes	1.65	0	4	1		No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes				Yes	Yes
Poland	Single agency	Yes	Yes	Yes	Yes	2.65	0	4	2	2	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9	11	8	Yes	Yes
Portugal	Inter agency	No	No	No	No	2.95	1	9	1	1	No	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	12	3	9	Yes	Yes
Romania	Inter agency	Yes	No	No	No	0.7	0	9	8		No	No	No	No			No	Yes	Yes	Yes	2		4	No	Yes
Slovak Republic	Multipartite	No	Yes	Yes	No	0.1	0	1			No	Yes	No	Yes	Yes	No	No	Yes	No	No				No	Yes
Slovenia	Multipartite	Yes	Yes	Yes	Yes	0.25	0	1	1		Yes	Yes	No	Yes	Yes	No	No	No	No	No				Yes	Yes
Spain	Inter agency	Yes	Yes	Yes	Yes	0.5	0	2		1	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	2	6		Yes	Yes
Sweden	Multipartite	No	Yes	Yes	No	0.7	0	2			No	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	7	11		Yes	Yes
Switzerland	Interagency	Yes	Yes	Yes	Yes	1.6	1	3			Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	5	6	3	Yes	Yes

Country	Structure & location					Resources						Reporting		Case-handling procedures			Promotional plan	Promoted Guidelines to:			# promotion			NCP meeting attendance	
	Structure	Advisory body	Struct. includes business	Struct. includes trade unions	Struct. includes NGOs	Total FTE staff	Full time	Part time	Joined 2024	Left 2024	Dedicated budget	Government	Parliament	In place	Online	Revised 2024		Business	Trade unions	NGOs	Organised	Participated in	Materials	June	November
Tunisia	Multipartite	No	Yes	No	Yes	0.35	0	2			No	Yes	No	No			Yes	Yes	Yes	No				No	Yes
Türkiye	Single agency	No	No	No	No	1.35	1	2			Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	3	4	1	Yes	Yes
Ukraine	Single agency	No	Yes	Yes	Yes	0.85	0	3			No	Yes	No	Yes	No	No	Yes	Yes	Yes	Yes	5			Yes	Yes
United Kingdom	Single agency	Yes	Yes	Yes	Yes	5	5	0	2		Yes	No	No	Yes	Yes	No	Yes	Yes	No	Yes		2		Yes	Yes
United States	Single agency	Yes	Yes	Yes	Yes	3.75	3	1	1	1	No	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	12	19		Yes	Yes
Uruguay*	Inter agency	Yes	Yes	Yes	Yes	0.25	0	1	1	1	No	Yes	No	Yes	Yes	No	Yes	Yes	No	Yes				No	No

Note: Stakeholder inclusion in NCP structure refers to inclusion of stakeholders either in the NCP main body or in a supporting body.

Note for Greece: the NCP is currently working to define a structure following a shift in competent authority for the NCP function.

Source: NCP Annual Reporting Questionnaire (2024)

Annex C. Key Peer Review Findings and Recommendations made in 2024

Estonia

Institutional arrangements

	Findings	Recommendations
1.1	The NCP staff shows dedication and works to build visibility of the NCP despite limited resources and expertise. The decision to separate the NCP and RBC policy teams has hindered the NCP's access to expertise and potential involvement in policy initiatives.	The Estonian Government should analyse the possibility of relocating the NCP, taking into consideration the results of the survey previously conducted, and with an aim to ensure RBC-related expertise within or easily accessible to the NCP. Regardless of a decision to change the location of the NCP, the Estonian government should ensure that the NCP has sufficient human and financial resources to address its responsibilities.
1.2	While the NCP has shown engagement with the RBC-related policy team in the Ministry of Economic Affairs and Communication, there is limited overall coherence and engagement amongst government members working in RBC-related initiatives and policy areas.	The Estonian Government should develop an internal intergovernmental platform or working-group that enables dialogue between different parts of government that engage in RBC-related policy work and initiatives. This would notably provide the NCP with access to the relevant expertise that it needs to address its responsibilities and provide the NCP with relevant contacts to support its dissemination of information related to the Guidelines across government.
1.3	While the NCP's location allows for proximity to business stakeholders, the NCP has not always been able to engage stakeholders from different groups at the same level. The NCP has identified a list of relevant stakeholders that could support its function, but it has not formalised the inclusion of any stakeholders within its institutional arrangements.	The Estonian NCP should identify core stakeholder entities that can support its mandate and seek to include them in a formal multistakeholder advisory body. This would help the NCP to build and maintain stakeholder confidence.

Promotion

	Findings	Recommendations
2.1	The NCP has shown commitment to its promotional work through yearly promotional events, providing an Estonian translation of the Guidelines, and its continued engagement in the Nordic-Baltic Regional NCP Network. These promotional efforts have not always been planned or conducted in a strategic manner and have not always targeted all stakeholder groups equally.	The NCP should develop a promotional plan that considers the priorities and available resources of the NCP. The plan should aim to increase promotional levels generally and ensure that all stakeholder groups are equally targeted.
2.2	The NCP has made efforts to identify relevant stakeholders, notably in the context of its peer review. It remains essential for the NCP to further expand and leverage such contacts to enhance promotion.	The NCP should leverage the contacts it has already identified in the context of the peer review and expand on these relationships to enhance promotional outreach. The examination and expansion of this contact list should be done in the context of a stakeholder mapping exercise.
2.3	The NCP has made efforts to develop a webpage to disseminate information related to the Guidelines, OECD due diligence guidance, and NCP mechanism, available in Estonian and English. The provided information is basic and largely comprises of links to materials developed by the OECD. The website does not include information on NCP events and promotional work.	The NCP should further utilise its website as a low resource method of promotion. This could include promoting past and future NCP events and ensuring the website is cross-referenced on partner websites. The NCP could further seek to enhance its online presence through the use of social media, either via its own account or using the account of a promotional partner.

Specific instances

	Findings	Recommendations
3.1	The NCP has not yet aligned its case-handling procedures with the 2023 version of the Guidelines but is well-positioned to do so with the feedback it received in the context of this peer review. The current iteration of the case-handling procedures is not always detailed in provisions and may reduce the predictability of the process. The NCP website and the case-handling procedures are additionally not aligned, notably on the timeline of issues that can be addressed and on confidentiality, which could further decrease the predictability of the process.	The NCP should revise its case-handling procedures to align with the 2023 version of the Guidelines and increase transparency around the NCP's intended process to handle a specific instance. This revision should ensure that the information provided on the NCP website and the case-handling procedures is aligned to preserve the predictability of the process.
3.2	Recent interest in the NCP mechanism via inquiries has suggested some visibility of the mechanism and, as visibility increases, the NCP might expect to receive a specific instance soon.	The NCP should ensure that it is prepared to handle a specific instance as the lead NCP. The NCP should notably consider the required resources, and the clarification of the NCP's decision-making process either through the case-handling procedures or another public document.

Support for government policies to promote RBC

	Findings	Recommendations
4.1	The NCP has contact with many government representatives that engage in RBC-related work. These representatives have shown interest in working with the NCP to address shared goals and work towards coherence among RBC-related initiatives. There is currently no formal relationship or structure that allows them to do so.	The NCP should continue supporting these links between relevant government departments to enable coherence of RBC-related policies and initiatives. The intergovernmental platform noted in Recommendation 1.2 could be leveraged as a tool to facilitate this link between relevant government actors.

Hungary

Institutional arrangements

	Findings	Recommendations
1.1	The NCP recently strengthened its engagement with stakeholders through the establishment of an advisory body. However, the visibility of the NCP remains limited among stakeholders, who notably did not provide responses to the written questionnaire during the preparatory phase of the peer review. Advisory body members also note the need for additional information on their role and the functions of the NCP. Functions of the advisory body are currently limited to input on promotional activities. They do not include providing oversight to the NCP.	The NCP should strengthen its engagement across stakeholder groups as a way to increase confidence, visibility, accessibility, transparency and strengthen its perception of impartiality. In doing so, the NCP should notably: <ul style="list-style-type: none"> • adjust the membership of its advisory body to achieve balance across the different stakeholder groups; • ensure the active involvement of current members of the advisory body, notably through more regular meetings; • strengthen the functions of the advisory body in providing advice and, if appropriate, oversight to the NCP on implementation of its activities; and • ensure structured dialogue with civil society organisations beyond issues related to the environment.
1.2	Official documentation on the NCP does not reflect i) the current structure of the NCP, including updated membership of the inter-ministerial body and establishment of the advisory body; ii) the decision-making practice in the inter-ministerial body; iii) the functions of the NCP Secretariat and the NCP Head; and iv) safeguards of transparency and impartiality, including access to documents and framework on conflicts of interest. Moreover, the legal framework on conflicts of interest only covers public officials. In light of the foregoing, some stakeholders asked for guarantees of the HNCP's impartiality in view of its location in a governmental authority focused on finance.	The NCP should adopt and publish safeguards to foster its impartiality and transparency. The NCP should notably issue public documentation on: <ul style="list-style-type: none"> • the composition of the inter-ministerial body and the consensus-based decision-making process; • the functions of the NCP Secretariat and the NCP Head; • the involvement of the advisory body in the work of the NCP; • the rules and process to request access to documents; and • a framework and process on detecting and addressing potential conflicts of interest of both inter-ministerial and advisory body members.

1.3	New members have recently joined the inter-ministerial body based on their expertise in different areas covered by the Guidelines. Moreover, the NCP Secretariat has faced significant turnover.	The NCP should take measures to ensure continuity in case of staff and membership changes in the future, notably through training on the NCP's mandate and RBC-related issues and introductory material on the NCP for new members of the NCP Secretariat, the inter-ministerial, and the advisory body. The NCP should also further explore capacity-building opportunities through cooperation with other NCPs, notably through the regional network of NCPs of Central and Eastern Europe.
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Promotion

	Findings	Recommendations
2.1	The NCP has recently increased its promotional activity (notably through brochures and a website), but its visibility and accessibility could be further strengthened, notably with a view to making the specific instance process better known to potential submitters.	The NCP should further promote its role, functions, and the specific instance process among stakeholders, including potential submitters, notably through: <ul style="list-style-type: none"> • a promotional plan prepared in consultation with the advisory body with measurable goals and specific timelines for each activity; • specific promotional roles for the NCP Head and the advisory body members; • participation in events organised by stakeholders with expertise in RBC; • an updated brochure consistent with the 2023 version of the Guidelines and Implementation Procedures; • additional information on its website, including i) the NCP's structure; ii) the composition and functions of the NCP's entities and the advisory body; iii) the NCP's reports to the OECD Hungarian National Council; and iv) information on upcoming activities; and • as appropriate, active social media presence.
2.2	Stakeholders note the need for more information on the Guidelines and the due diligence framework, in particular among small and medium-sized enterprises (SMEs). They note that the Guidelines will be particularly relevant in view of recent and upcoming developments linked to incoming foreign direct investment flows and third-country workers	The NCP should promote the Guidelines and the due diligence framework by: <ul style="list-style-type: none"> • translating into Hungarian the 2023 version of the Guidelines and launching it through a public event; • translating the remaining sectoral guidances and disseminating them on its website and through promotional events; • organising events and training targeted to sectors linked with RBC risks, including the battery production sector and risks to migrant workers; and • organising promotional events targeted to specific stakeholder groups, including training for SMEs, trade unions, and CSOs.

Specific instances

	Findings	Recommendations
3.1	The NCP has detailed and clear case-handling procedures. Certain aspects of its case-handling procedures could be revised to enhance compatibility with the Guidelines. The NCP has noted its plans to review its case-handling procedures to make them consistent with the 2023 version of the Guidelines.	In its planned update of the case-handling procedures to make them consistent with the 2023 version of the Guidelines and Procedures, the NCP should notably address, in consultation with stakeholders: <ul style="list-style-type: none"> • coordination with other NCPs; • deletion of the time limit between the date of the facts and the date of submission of the case; • communication with the parties on the process and potential outcomes; • sharing information and documents brought forward by one party in the proceedings with the other; • publishing statements in both non-accepted and accepted cases; • granting anonymity to the parties as an exception and only following a reasonable request; • addressing risks of reprisals against parties to a specific instance; • follow-up on agreements at the NCP's initiative and publication of follow-up statements; and • timeframes for all phases of the specific instance process.
3.2	The NCP's statements do not generally include the identity of the parties, details on the issues raised, and the rationale behind the NCP's decision. The NCP also has	The NCP's statements should, in the future, contain the following elements: a description of the issues, an analysis of the issues, detailed and tailored recommendations, and provisions for follow-up with specific

not made detailed and tailored recommendations.	timeframe in case of recommendations and/or agreement between the parties. The NCP should also ensure that, consistent with the 2023 Procedures, statements should only be anonymised as an exception rather than the rule and that the granting of such exception be duly justified by specific reasons.
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Support for government policies to promote RBC

	Findings	Recommendations
4.1	The NCP's inter-ministerial structure enables it to support government policies and facilitate coordination across the government. The HNCP recently launched preparations for a National Action Plan on Business and Human Rights (NAP).	The NCP could further contribute to strengthening policy coherence for RBC based on the Recommendation on the role of government in promoting RBC, notably by: <ul style="list-style-type: none"> • further promoting the Guidelines among concerned governmental authorities; • proceeding with preparations for the adoption of a NAP; and • supporting the government in ensuring that its policy of attracting foreign direct investment supports implementation of the Guidelines, and notably contains a component of informing foreign investors of expectations to respect the Guidelines, in particular protection of migrant workers.

Iceland

Institutional arrangements

	Findings	Recommendations
1.1	The human resources available to the NCP have increased in the past three years. The NCP has today three part-time members. However, due to heavy workload on their other duties, NCP members dedicate limited time to the NCP.	The human resources of the NCP should be at least maintained, or ideally reinforced. Iceland should notably ensure that a minimal share of each staff member's time is allocated to the NCP to ensure time dedicated to NCP-related work on a regular basis. Such allocation of time should be defined in line with a plan of activities for the NCP, and regular meetings of the steering group.
1.2	The NCP strengthened its engagement with stakeholders through the recent establishment of the steering group with representatives of governmental authorities and stakeholders. However, awareness of the steering group among stakeholders is low. Stakeholders, including steering group members, ask for more information on the group's mandate.	To strengthen its visibility, engagement with stakeholders, and stakeholder confidence, the NCP should <ul style="list-style-type: none"> • adopt detailed terms of reference for the recently established steering group to clarify its tasks, composition, and rules of operation, including frequency of meetings; and • make these terms of reference publicly available.
1.3	The steering group consists of seven organisations, including four governmental authorities, one business, one trade union, and one multistakeholder organization, which is primarily composed of businesses. The NCP does not include representatives from civil society organisations (CSOs).	To strengthen its impartiality, the NCP should take measures to ensure balance of views within its structure. Iceland should notably ensure equitable representation of all stakeholder groups in the steering group by including at least one CSO representative.

Promotion

	Findings	Recommendations
2.1	The visibility of the NCP is currently low, notably as a result of limited promotion and human resources. The recent establishment of the steering group offers opportunities for targeted promotional planning. The NCP has also identified additional stakeholders beyond the steering group.	The NCP should strategically expand its visibility and promotional role through a promotional plan that includes i) stakeholder mapping; ii) key sectors (including fisheries, the financial sector, institutional investors) and issues (including migrant workers); iii) leveraging the location of the NCP and the membership of the steering group; iv) consultations with stakeholders beyond the steering group; and v) specific timelines for each activity.
2.2	Stakeholders are aware of sustainability standards and interested in supporting their implementation. They ask for	The NCP should strengthen general awareness of the Guidelines and the specific instance process among stakeholders, notably by:

	more information on the Guidelines, the NCP, and the specific instance process.	<ul style="list-style-type: none"> • translating into Icelandic the 2023 version of the Guidelines and launching it through a public event; and • organising promotional events targeted to stakeholders and sectors in line with its promotional plan.
2.3	Information on the NCP's webpage is limited. It could be expanded to provide a comprehensive resource on RBC and a more important tool for the promotion of the Guidelines in Iceland.	<p>The use of the NCP's webpage and social media as tools for visibility, accessibility, transparency, and accountability should be enhanced through:</p> <ul style="list-style-type: none"> • a more user-friendly webpage; • additional information on the webpage, including <ul style="list-style-type: none"> o the structure of the NCP; o the NCP's annual reports to the OECD; o the NCP's promotional plan and an agenda of events; o events organised and participated in; o more detailed language on the Guidelines and the due diligence framework; o the NCP's case-handling procedures, including a flowchart of the process; and o a clear and comprehensive submission form for specific instances.

Specific instances

	Findings	Recommendations
3.1	The NCP does not have case-handling procedures. Stakeholders perceive case-handling procedures as a prerequisite to filing specific instances. The NCP is currently working on draft text and plans to consult stakeholders through the steering group.	The NCP should prioritise the adoption of case-handling procedures consistent with the 2023 Implementation Procedures with a sufficient level of detail and following stakeholder consultation.
3.2	At the time of the on-site visit, the NCP had not received any specific instance. Stakeholders requested more information on the specific instance mechanism and process.	To strengthen accessibility of the mechanism, the NCP should publicise and disseminate, notably on its webpage: <ul style="list-style-type: none"> • a submission form for specific instances; and • a shorter version of the case-handling procedures (e.g. through a flowchart).

Support for government policies to promote RBC

	Findings	Recommendations
4.1	The NCP's location in the Ministry and its inclusion in the RBC Group enable it to support government policies to promote RBC. The NCP's leading role in preparations for a National Action Plan on Business and Human Rights (NAP) and interest from other governmental agencies for more information offer opportunities to further promote the NCP and RBC across government.	<p>The NCP could further contribute to strengthening policy coherence for RBC based on the Recommendation on the role of government in promoting RBC, notably by:</p> <ul style="list-style-type: none"> • proceeding with preparations for the adoption of a NAP; • proactively seeking synergies with other parts of the government to disseminate the Guidelines, and the OECD due diligence guidances; • strengthening its visibility within government, notably by proactively coordinating with other parts of the government to input on relevant ongoing initiatives, including the elaboration of a national strategy for tourism; and • establishing links with embassies abroad.

Kazakhstan

Institutional arrangements

	Findings	Recommendations
1.1	Stakeholders clearly recognize the efforts of the NCP to establish and develop itself and its activities, particularly in recent years. The NCP composition, as entered into force in January 2024, is not balanced. The exclusion of trade	The NCP should ensure representation from all stakeholder groups within its institutional arrangements by including trade union stakeholders in the NCP main membership.

	union stakeholders within the NCP institutional arrangements excludes views from trade unions and workers and could limit confidence in the NCP mechanism from this group, which has already made multiple specific instance submissions.	
1.2	Until January 2024, the NCP made decisions based on consensus when half of the NCP main members and selected expert members were present. The updated decision-making procedures allow for majority-based voting when two-thirds of the NCP members are present. Particularly in the case of an NCP member recusing themselves from the vote due to a conflict of interest, the decision-making could be unbalanced and lead to issues relating to the perception of impartiality of the NCP.	In order to avoid real or perceived issues of impartiality, and ensure a balanced vote where possible, the NCP should seek to make decisions based on consensus of all member groups. The NCP could further ensure a balance is maintained in voting by attributing an equal number of vote per member category, and by including at least two representatives per member group to ensure representation of all groups even in the absence or recusal of some members.
1.3	The NCP has showed a clear effort to establish its operating procedures and has included these procedures in Ministerial Orders, supporting the predictability and accountability of the NCP mechanism. However, the orders are not always aligned with the provisions and language provided for in the Guidelines. The updated orders additionally remove the expert membership of the NCP and contain less information on the provision of experts.	The NCP should revise its operating procedures, aligning internal wording for consistency and generally aligning with the wording and provisions of the Guidelines. The NCP should provide further details on provision of expert advice, for example by noting that the NCP maintains a list of relevant external experts to be called upon in case of need. Such a list would already have a basis in the previous list of expert NCP members.

Promotion

	Findings	Recommendations
2.1	The NCP has made clear efforts to conduct a variety of promotion to all different stakeholder groups and has developed promotional plans yearly. However, promotional planning has not always been strategic and does not provide for a strategy to measure awareness or promotional needs of different stakeholder groups, often resulting in high level promotional activities.	As the NCP continues to enhance its promotional work, it should develop a strategic promotional plan that contains provisions for measuring awareness of the NCP and the Guidelines among different stakeholder groups. Such information will inform the NCP's future promotional priorities and can allow for more tailored promotional events, for example on due diligence, targeting specific stakeholder groups and sectors.
2.2	The NCP has developed relationships with all different stakeholder groups, both through its institutional arrangements and through its promotional work. Despite having such connections, much of the NCP's promotional work is still developed and implemented by the staff of the NCP Secretariat.	The NCP should leverage its membership and stakeholder network to support the planning and implementation of its promotional work. The involvement of stakeholders in the development of the NCP's promotional plan and activities can increase stakeholder confidence and trust in the mechanism.

Specific instances

	Findings	Recommendations
3.1	The NCP has made efforts to increase the visibility of the NCP non-judicial grievance mechanism, as evidenced by recent increases in submissions and various supporting materials online. The NCP's case-handling procedures, at times, lack detail and clarity, and have not yet been updated to align with the 2023 version of the Guidelines.	The NCP should revise its case-handling procedures to align with the 2023 version of the Guidelines, notably on confidentiality, coordination, parallel proceedings, and reprisals. The revision should ensure also that the English version of the procedure is aligned with the terminology provided for in the Guidelines, such as with the Core Effectiveness Criteria. The revision should further ensure that selected wording does not limit the scope of potential submitters or enterprises, create an overly burdensome initial assessment procedure, or limit transparency of the mechanism.
3.2	The NCP has limited experience in handling specific instances. While the NCP has been using its case-handling procedures for the first time in recent years, it has not always communicated proactively with the Parties on expectations or feedback in the process.	The NCP should be more active with the Parties to specific instances in practice, notably by ensuring that the process is explained, and Parties are able to provide feedback, such as on draft statements. This engagement in practice should additionally extend to supporting NCPs where relevant, ensuring the NCP follows relevant provisions from the Guidelines on coordination.

Support for government policies to promote RBC

	Findings	Recommendations
4.1	Kazakhstan has clearly shown RBC is a priority area through recent initiatives, such as the draft National Action Plan on Business and Human Rights. The NCP itself has not always played a major role in contributing to policy coherence and, while policies have related to the Guidelines or the NCP, they have not always included explicit references.	The NCP and its members should continue promoting policy coherence for RBC by actively promoting the Recommendation on the Role of Government in Promoting RBC and acting as a coordinating point for exchanges among relevant ministries to ensure implementation of the recommendation. In its role to support government policy, the NCP should seek to include references to the Guidelines and the NCP, where appropriate.

Poland

Institutional arrangements

	Findings	Recommendations
1.1	The NCP has operated with the same lead staff member since 2016, which ensures continuity and strong institutional memory. Stakeholders welcome the expertise and institutional knowledge of the two NCP staff members. However, the NCP's human resources have decreased in the past five years despite the increased interest in RBC from stakeholders.	The human resources of the NCP should be reinforced, notably with staff dedicated to promotional activities and communication. The NCP should also ensure continuity in case of staff changes in the future through a handover strategy.
1.2	The current NCP staff is praised across stakeholders for their knowledge, impartiality and integrity, which translates into high levels of trust from stakeholders. However, stakeholders perceive a risk of conflicts of interest in the future, due to the NCP's location in the Ministry of Development Funds and Regional Policy.	Poland should establish formal impartiality safeguards through consultation and cooperation with stakeholders. This could notably be achieved by institutionalising current NCP practices and operating procedures, including on independent decision-making and absence of reporting lines on the substance of cases beyond the NCP, and a conflict-of-interest policy. The Guide for NCPs on building and maintaining impartiality may provide useful guidance in this regard.
1.3	The CSR Board has raised the NCP's visibility through dissemination of information and highlevel feedback on the NCP. However, it does not ensure meaningful engagement with and input from stakeholders on the NCP's work.	The NCP should ensure meaningful engagement with stakeholders beyond the CSR Board. This could notably be achieved through the creation of an NCP advisory board with targeted membership covering different thematic areas under the Guidelines and balance of views of different stakeholder groups.

Promotion

	Findings	Recommendations
2.1	The NCP has a strong promotional strategy, and has adopted annual promotional plans since 2017. In addition to high quality events in different formats, and a promotional booklet, the NCP has translated into Polish and disseminated the Guidelines and OECD due diligence guidances. Stakeholders note that the NCP needs to reach out to stakeholders who are not aware of the Guidelines and the NCP. They would also welcome more practical advice.	Building on its strong promotional activities, the NCP should seize opportunities for: <ul style="list-style-type: none"> • promotion among stakeholders who are not already aware of RBC standards, including for example through i) events at regional level; ii) stronger outreach to small and medium-sized enterprises (SMEs) and trade unions; iii) outreach to state-owned enterprises (SOEs) on the relevance of the Guidelines for their activities; iv) events with young professionals and boards of large Polish companies; v) partnering with possible actors that could add as multipliers (e.g. economic officers in embassies or investment promotion agencies); • promotion focused on practical training and implementation in different formats (e.g. awareness surveys, information on positive outcomes of concluded cases; best practices in implementation of due diligence standards; workshops on due diligence).
2.2	The NCP has maintained a dedicated webpage on the Ministry website since 2016 in both Polish and English. The webpage covers comprehensive information and is regularly updated. Stakeholders note opportunities to improve its discoverability and include more information on the NCP itself. The NCP is not active on social media.	The value of the NCP's webpage and social media as tools for visibility, accessibility, transparency, and accountability should be enhanced, through: <ul style="list-style-type: none"> • a more user-friendly and easily accessible webpage; • additional information on the webpage, including on the NCP's structure and its work;

- active social media presence.

Specific instances

	Findings	Recommendations
3.1	The NCP has detailed and clear case-handling procedures, and a practical flowchart describing the process. Certain aspects of its case-handling procedures could be revised to enhance compatibility with the Guidelines. The NCP has noted its plans to review its case-handling procedures to align with the 2023 version of the Guidelines.	In its planned update of the case-handling procedures to align them with the 2023 version of the Guidelines and Procedures, the NCP should notably address, in consultation with stakeholders: <ul style="list-style-type: none"> • initial assessment criteria; • scope of covered enterprises to include companies operating in or from non-Adherent countries; • addressing risks of reprisals against parties to a specific instance; • regular and consistent follow-up on both agreements and recommendations; • indicative timeframes for the different phases of the specific instance process.
3.2	The NCP has a high rate of acceptance of specific instances, with two non-accepted cases out of seven closed cases, both before 2017. However, potential submitters may face difficulties to access the process. Submitters of closed cases noted difficulties in filling out the submission form. Stakeholders also asked for the possibility to conduct proceedings in other languages.	The NCP should further strengthen the accessibility of the mechanism by improving the ease of use of a submission form available on its website, and by providing a reasonable degree of flexibility in allowing notifications in other languages than Polish from non-Polish speakers where necessary.

Support for government policies to promote RBC

	Findings	Recommendations
4.1	The NCP's location in the CSR Division allows it to play a strong role in the promotion of the OECD RBC standards across different RBC-related initiatives within the government. There are opportunities for the NCP to work towards strengthening policy coherence for RBC.	The NCP could further strengthen partnerships with different parts of the government to strengthen policy coherence for RBC based on the Recommendation on the role of government in promoting RBC, notably by: <ul style="list-style-type: none"> • building on existing links with officials with competence for investment promotion, trade, and public procurement; • disseminating final statements and information on engagement in good faith of the parties to specific instances to relevant governmental authorities active on RBC-related issues.

Romania

Institutional arrangements

	Findings	Recommendations
1.1	The NCP has already started reflecting on its structure and potential improvements are supported at a high level. The NCP secretariat is currently located in the Foreign Investment Directorate of ARICE, which may limit the NCP's access to different stakeholder groups based on the mandate of the Directorate. Due to its role in investment promotion, stakeholders have raised questions concerning the real or perceived risk of a conflict of interest based on the secretariat location.	The NCP should carefully consider the location of the secretariat to ensure it is well-situated to effectively enable outreach to a breadth of stakeholders—including all types of businesses that would fall under the scope of the Guidelines—and, not exposed to risks of real or perceived conflict of interest, and enables to the NCP to address its responsibilities.
1.2	The current structure of the NCP enables broad access to government actors, which enhances the expertise available to the NCP. However, the structure is outdated and does not reflect current practices or enable the NCP to address its responsibilities. In practice, the NCP membership has not met and the work of the NCP has been taken at the level of the secretariat.	The NCP should formalise its structure and function by updating the Government Decision that establishes the NCP and complementing it with a public document that explains the NCP's operations. The complementary document should additionally include the membership of the NCP and advisory body, and clarify the NCP's decision making procedures and the role of the advisory body. The updated document should plan for regular meetings of the NCP and advisory body, in any case more than

		once per year, and include provisions whereby any member of the NCP or advisory body could call a plenary meeting of the NCP. The updates should be consulted with stakeholders and should ensure a balanced inclusion of stakeholders within the NCP's institutional arrangements.
1.3	NCP secretariat's staff resources have improved in recent years. Given the important workload of the NCP in updating its structure and function, as well as in preparation of the NCP to receive its first specific instance, current resources may not be sufficient.	The NCP should have dedicated full-time staff. The addition of full-time staff would additionally support the NCP in ensuring impartiality and avoiding potential conflicts of interest.

Promotion

	Findings	Recommendations
2.1	The NCP has made positive developments in its promotional efforts, including by promoting to a broader range of stakeholders. The NCP has additionally developed its first promotional plan, which already addresses some weaknesses relating to the NCP's promotion. However, the promotional plan is broad and does not strategically identify priorities, target stakeholder groups, or key issues for promotion. The development of the promotional plan did not involve a consultation with the NCP membership or stakeholders.	The NCP should refine its promotional plan, notably to include: <ul style="list-style-type: none"> • Target audiences, sectors, and issues, all of which that enhance the scope of the NCP's promotional work; • A media strategy for outreach, both considering opportunities for promotion with social media and traditional press; • The promotion of the NCP as a non-judicial grievance mechanism, highlighting its advantages as compared to other existing grievance mechanisms available in Romania; • A stakeholder engagement strategy that builds upon the connections made during the peer review and ensures ongoing engagement with stakeholders; When designing the updated and future promotional plans, the NCP secretariat should seek feedback from stakeholders, notably from its NCP membership and advisory body members. The NCP should make promotional plans publicly available.
2.2	The NCP's 2024 promotional plan foresees work in the development of materials into Romanian, such as the translation of the 2023 version of the Guidelines. The NCP has not to date developed any of its own promotional materials and OECD-developed materials available on the NCP web page are available in English only, possibly limiting accessibility of the information for the local population. The information on the NCP webpage is basic and does not provide sufficient information to understand the Guidelines or the NCP.	The NCP should develop publicly available promotional materials, tailored to the Romanian NCP and the Romanian country context. Materials should be available in at least Romanian and English, including the 2023 version of the Guidelines. The NCP should additionally review the NCP webpage to ensure clear access to relevant information. This could include the addition of promotional materials (e.g. flyers, newsletters, presentation, videos), a calendar of NCP's events, or an FAQ relating to the Guidelines or handling of specific instances. Promotional materials could be developed in a cost-effective manner using in-house resources.

Specific instances

	Findings	Recommendations
3.1	In the context of the peer review, stakeholders have expressed interest in the NCP non-judicial grievance mechanism. The NCP does not have case-handling procedures, which is considered a prerequisite to receiving a specific instance.	The NCP should adopt case-handling procedures that have undergone a stakeholder consultation, are aligned with the 2023 version of the Guidelines, and ensure predictability in the process, for example by specifying the roles of the NCP membership and advisory body in the process.
3.2	The NCP secretariat has taken steps to build its expertise relating to handling specific instances, including by attending OECD and ILO trainings. However, the NCP still has limited expertise and capacity to handle a specific instance based on the lack of preparation and engagement of the NCP membership in NCP operations to date.	The NCP should ensure that it is prepared to handle a specific instance, notably by: building expertise among the NCP on skills relating to the handling of specific instances, such as mediation, and ensuring access to expertise by engaging in continued dialogue with the updated NCP membership and advisory body, ensuring access to experts covering all thematic areas of the Guidelines.

Support for government policies to promote RBC

	Findings	Recommendations
4.1	Government actors working in RBC-related areas have shown an interest in engaging further with the NCP. The	The NCP secretariat should actively maintain dialogue with other government actors, building on the momentum started during the peer review.

	NCP has not engaged with other government actors previously.	
4.2	Given the existing RBC-related policies and initiatives in Romania, and the willingness to cooperate of the government actors working in RBC-related areas, there is opportunity for policy coordination. The NCP has not established itself as a focal point or relevant actor in such coordination.	The NCP secretariat should seek to establish itself as a focal point for policy initiatives relating to RBC, acting as a resource to relevant government ministries and agencies, and strive to enhance the coherence of such policies and initiatives with the Guidelines.

Türkiye

Institutional arrangements

	Findings	Recommendations
1.1	The NCP lacks a legal instrument or official document outlining its mandate, functions, decision-making processes and reporting lines. This absence has raised concerns of a lack of clarity and transparency over the NCP's activities, which could potentially impact its impartiality and predictability.	The NCP should develop, publish and communicate a founding document that clearly establishes the NCP to foster its impartiality and predictability. The NCP could also make reference to its decision-making process regarding specific instances in its case-handling procedures to enhance transparency around the structure and function of the NCP.
1.2	The NCP's location within a directorate that grants investment incentives to business, the closer relationship of the directorate with companies compared to other stakeholders and the absence of a clear separation between the NCP team and the incentives team have raised concerns among stakeholders regarding the perception of impartiality. This can also create potential conflict of interest.	The Turkish government should establish the NCP as an independent unit within the Ministry of Industry and Technology to ensure operational autonomy, address the perception of impartiality, and prevent potential conflict of interest. The NCP could take additional measures in this regard, such as developing a conflict-of-interest policy for its members to address these concerns.
1.3	The NCP's single-agency structure hampers its ability to establish structural relations with stakeholders and other government departments, limiting visibility and access to expertise, hindering stakeholder engagement and confidence and affecting the perception of impartiality.	The NCP should create an inter-governmental platform including key ministries and an advisory body for stakeholder engagement, to strengthen its visibility and access to expertise and to enhance collaboration and integrate input from diverse perspectives in the NCP's functioning. The NCP should ensure diversity in the advisory body, with equitable representation from government, business, trade unions, civil society and academia.

Promotion

	Findings	Recommendations
2.1	While the NCP has recently increased its promotional efforts, the visibility of the NCP and the Guidelines remains low due to low levels of promotion in the past.	The NCP should develop and publish a promotional plan. As an initial step, the NCP could conduct a stakeholder mapping exercise to establish and identify a community around the NCP. The Turkish government should allocate the necessary human and financial resources to ensure the effective implementation of this plan. The plan could focus on the following key issues, sectors and regions: <ul style="list-style-type: none"> • Issues: child labour, migrant workers, green transition (energy generation), assisting companies in adjusting to legislation, and combating corruption. • Sectors: mining, garment, automotive and manufacturing, chemicals, and agriculture. • Regions: promotion beyond Ankara and Istanbul to reach SMEs, in collaboration with local offices of development agencies, ministries, and the National Human Rights Institution of Türkiye, among others.
2.2	Most OECD RBC documents are only available in English or have been translated by third parties, limiting their dissemination and use. In this regard, stakeholders expressed concerns about the inconsistency in terminology.	The NPC should undertake translations for untranslated documents, including the OECD Due Diligence Guidance for RBC, and review third-party translations to ensure coherence and accuracy.
2.3	The webpage was noted as not easily discoverable and user-friendly, thereby limiting the accessibility and visibility	The NCP should enhance its website to improve the user experience. To the extent possible, it is recommended to create different pages for

of the NCP.	Turkish and English text, making a clearer differentiation between documents provided in both languages, to improve overall accessibility and usability.
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Specific instances

	Findings	Recommendations
3.1	<p>The NCP's case-handling procedures currently lack clarity and are not fully aligned with the 2023 version of the Guidelines. Stakeholders highlighted the need for greater clarity on certain issues to enhance trust and strengthen the predictability of the specific instance process.</p> <p>In addition, the process for case submission is unclear, not easily identifiable, and lacks user-friendliness, thereby limiting accessibility and predictability. The NCP has expressed plans to review its case-handling procedures.</p>	<p>The NCP should review and update its case-handling procedures in consultation with relevant stakeholders to align with the 2023 version of the Guidelines. The revised procedures should be clear and accessible and encompass the following key elements:</p> <ul style="list-style-type: none"> • Consultations with parties on draft statements. • A dedicated section addressing impartiality and conflict of interest, including transparency in the decision-making process. • Notification of relevant government agencies of the good faith engagement, or absence thereof, of the parties. • Implementation of appropriate steps to address risks of reprisals against parties to a specific instance. • Indicative timeframes for initial assessments, conclusion, and follow-up in specific instances. • Publication of statements, including those related to non-accepted specific instances, as well as follow-up statements. • Provision for the possibility of following-up on agreements or recommendations, where relevant. • NCP's ability to make recommendations and, to the extent possible, determinations. • Clarity in the section on confidentiality and transparency. • Information on parallel proceedings. <p>In addition, the NCP should also increase the accessibility of the grievance mechanism, e.g., by creating an online form for the submission of specific instances and improving the information related to case submission on its webpage.</p>
3.2	<p>Parties to specific instances raised concerns regarding delays, lack of communication and insufficient transparency in the NCP's decisions in specific instances, impacting the confidence of the parties in the process.</p>	<p>The NCP should improve proactive communication with parties, offering more detailed information on the progress of cases and following indicative timelines. In addition, the NCP should provide additional details in its statements, ensuring transparency on the steps taken and offering clarity on the issues and reasons underlying the NCP's decisions. In doing so, the NCP could follow the templates developed by the OECD for initial assessments and final statements as a guide.</p>
3.3	<p>The NCP has closed cases when companies refused good offices without examining the issues. This represents a missed opportunity to analyse issues and make recommendations to further the effectiveness of the Guidelines and follow up on these recommendations.</p>	<p>The NCP should continue examining cases even if companies are unwilling to engage, issuing detailed final statements with findings and recommendations. Additionally, the NCP should follow up on cases and consider issuing follow-up statements, where relevant.</p>

Support for government policies to promote RBC

	Findings	Recommendations
4.1	<p>The NCP has developed structural relationships with a limited number of government agencies, resulting in limited knowledge and understanding of the NCP and the Guidelines within the government as a whole. Nonetheless, there is a strong overall interest from the government in developing and maintaining collaborative relations and cooperation with the NCP.</p>	<p>To support the development, implementation and coherence of policies to promote RBC, the NCP should establish and maintain continuous communication with other relevant parts of the government. In line with the Recommendation on the role of government in promoting RBC, the NCP should facilitate coordination within government, provide updates on its activities and specific instances, engage in exchanges on RBC-related matters, and advocate for stakeholder participation in the implementation, monitoring and promotion of RBC</p>