

WHAT “GOOD” LOOKS LIKE

Direct linkage



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What “good” looks like

Direct linkage

“Direct linkage is not a safe harbour. It is a Rubicon, and the only question is whether it has been crossed.”

Gerald Pachoud, GBI Senior Advisor

Why this practice-based series?

In 2011, the States in the UN Human Rights Council unanimously endorsed the UN Guiding Principles on Business and Human Rights (UNGPs). The UNGPs have enjoyed broad support by companies, industry groups, sustainability and human rights experts, civil society, and affected stakeholders because the UNGPs were based on years of rigorous research and broad global engagement.

The Global Business Initiative on Human Rights (GBI) is the only business-led initiative solely focussed on supporting companies through peer learning to improve the implementation of their responsibility to respect human rights under the UNGPs and carry out human rights due diligence. That work has resulted in a substantial and detailed repository of practice-based insights and knowledge about what human rights due diligence means when facing real-world challenges, and what can reasonably be expected of companies in their pursuit of respecting human rights and the environment.

As regulations such as the European Union’s Corporate Sustainability Due Diligence Directive (CSDDD) and other national laws establish binding obligations that largely codify and operationalise the core principles of the UNGPs, GBI is now sharing its experience and practice-based insights in a guidance series about “what good looks like.”

The aim of this series is to help further the development of mandatory due diligence legislation on sustainable business in the European Union and elsewhere in ways that are practical, realistic, and in line with the UNGPs. This guidance also aims to help companies to understand what “good” looks like when it comes to implementing mandatory human rights and environmental due diligence.

Why focus on direct linkage

The corporate responsibility to respect human rights requires companies to identify and address impacts they cause, contribute, or which are directly linked to their operations, products or services. The concept of direct linkage was introduced in the UNGPs to capture a central reality: in many cases, companies are neither causing nor contributing to harm, but are connected to it through their products, services or operations. It reflects the structure of globalised value chains, where adverse impacts are often situated at arm's length from a company's own activities.

At the same time, the UNGPs deliberately limit this responsibility to direct connections. Companies are not expected to address issues wholly detached from their business. Where the linkage is not direct, there is no responsibility to act and that boundary is an integral feature of the framework, not a gap to be filled.

“Direct” has two different aspects in the UNGPs framework. The first is categorical: “direct linkage” is the name the UNGPs give to the third mode of involvement, where a company is connected to adverse impact but has neither caused nor contributed to that harm.

The second is qualitative. Within that category, the connection must have a quality, a degree of directness, which crosses a threshold distinguishing direct linkage from mere contextual association. This guidance briefing is concerned with the second aspect: what quality a connection must have to engage the UNGP Principle 19 leverage responsibility.

Acting appropriately in situations of direct linkage is also sound business practice. It reduces value chain risk, supports more stable commercial relationships, consolidates operational resilience, and protects reputations. Yet in practice, some companies treat direct linkage as discretionary, on the basis that the UNGPs are not legally binding.

Where domestic law does not explicitly codify the concept of direct linkage, the absence of immediate legal exposure is often taken as a reason not to act. This is a mistake. The responsibility to respect human rights under the UNGPs exists independently of domestic law and is widely recognised as the authoritative global standard used not only by regulators, but by investors, customers and civil society to assess the behaviour of companies.

Moreover, the regulatory landscape is shifting rapidly. Companies that have not developed the analytical capacity to identify and respond to direct linkage risks will find themselves structurally unprepared as these obligations crystallise and will lack the time required to build the leverage that these specific situations require.

What practitioners should know about direct linkage

Two criteria that make linkage direct

Determining whether a company is in a situation of direct linkage can be more of an art than a science, though there are parameters. The starting point is the UNGPs themselves, their commentary, and subsequent authoritative interpretation.

The commentary does not specify how the threshold of sufficient directness is to be assessed, but it is clear on one foundational point: the relevant question is the quality of the connection through the business relationship, not the proximity or distance between the company and the harm. That reading was confirmed and sharpened by the Office of the United Nations High Commissioner for Human Rights.¹

Two criteria for assessing whether a connection meets the directness threshold follow from that foundation and from accumulated practice in implementing the UNGPs: specificity and traceability.

These criteria are not absolute rules, and they do not produce automatic answers. They are analytical tools, a structured way of working through a question that will often involve incomplete information, contested facts and genuine uncertainty. Real situations rarely present themselves cleanly: a connection between the company and the harm may be only partially traceable, a product's function in a specific deployment context may be ambiguous, the relevance of a harm of a particular service may be genuinely debatable. In those situations, the criteria provide a framework for disciplined reasoning, not a formula that delivers a verdict.

Specificity

- **The core question:** Is there a connection between this company's specific operations, products or services and this specific adverse impact or is it simply a consequence of operating in a harmful context?
- **What this means in practice:** The question is not whether the company's activities are associated with an adverse impact in a general way. It is whether a line can be drawn from a particular operation, product or service to a particular mechanism through which harm is caused. A telecommunications company whose network infrastructure is used to coordinate detentions is not directly linked to those detentions simply because it operates in the country. It becomes a candidate for direct linkage when the connection runs from its specific network, or a specific service contract, to the specific operational capacity the third party is using to carry out the detentions.

This criterion excludes:

- Connections based solely on sectoral presence
- Geographic association
- General commercial relationships not tied to the specific adverse impact mechanism.

The fact that another company could have provided the same product or service, meaning the third party could easily have obtained it from another source, does not change the specific connection because it does not change what this company actually provided, to whom, and in what context. The specific connection exists because of what happened: *this company, this product or service, this third party, this adverse impact mechanism*. It is not because of what might have happened if the commercial relationship had been structured differently. The connection is specific because it is real and identifiable, not because it was irreplaceable.

¹ Office of the United Nations High Commissioner for Human Rights, Response to the complaint submitted to the UN Working Group on Business and Human Rights regarding the financing of the Roundup of Rohingya Muslims in Myanmar, 2017.

Traceability

- **The core question:** Can the connection be demonstrated through identifiable or reasonable inference, or does it rest on assumption or general association?

Tracing adverse impacts through value chains and business relationships is the core investigative task of HREDD, and this criterion requires that the connection meet a basic standard of demonstrability.

- **What this means in practice:** Each material step in the connection must be capable of being established. It doesn't need to be proven beyond doubt, but grounded in available evidence, sound operational logic or reasonable inference from the circumstances, rather than assumed. Where a step cannot be directly evidenced, it may still be treated as established if it is the logical or likely consequence of what is known.

A fuel delivery to a military unit launching documented attacks on civilians may establish a credible connection even without direct evidence of one specific attack. What the criterion excludes is not inference, but speculation and the line is whether the direct link can be reasoned through, each step stated and defended from the evidence, operational context or documented conduct, rather than filled in because the overall picture looks incriminating.

The challenge of negligibility

A recurring question arises where a company's specific, traceable product is only a negligible part of the thing that does the harm: the proverbial standard screw that ends up, several steps downstream, in a machine causing a negative impact. The temptation is to scope such a company out at the definitional stage, on the basis that its product makes too small a difference to count.

That reasoning should not be followed. Whether a company is directly linked turns on whether its product connects to the harm, not on how large a part it plays, and treating size as a test blurs the line between linkage and contribution. Where a connection is specific and traceable, the company is directly linked. Smallness does not cut the link.

What smallness affects is the response, not the definition, and it does so through leverage and prioritisation. Leverage is not fixed: it moves with what the company knows about where its product goes. In reality, little can reasonably be expected of the company, because there is little it can practically do when the same standard part dispersed across many buyers and end-uses, with no way to identify which reaches harm.

A negligible connection therefore sits low in the order of priority, but a low priority is still a priority, not an exclusion. The moment a specific intermediary or a flagged end-use comes into view, knowledge rises, leverage becomes more feasible, and the reasonable response rises with it.

For the practitioner, this means a direct link through a negligible product or service may mean little to do at the moment, but it calls for staying alert to new information that would change the picture — a named intermediary, a flagged end-use, a credible report — so that a finding of “little to do for now” never hardens into a permanent exemption.

Establishing (and not presuming) the absence of direct linkage

A conclusion that a connection is too remote to constitute direct linkage is legitimate under the UNGPs, but it is not a default position. It must be demonstrated: what was assessed, based on what information, when, and why the threshold is not met. Without this, it is not an analytical conclusion but an assertion.

Where genuine uncertainty remains after applying the criteria carefully and in good faith, responsible companies should treat the situation as one of direct linkage rather than concluding that no link exists. This reflects both the spirit of the UNGP and the basic logic of human rights due diligence. A company that treats an ambiguous situation as direct linkage and exercises whatever leverage it has available is in a fundamentally different position, normatively and practically, from one that takes no action. The criteria exist to guide that reasoning, not to licence inaction in hard cases.

Common myths and realities from practice

Common myth	What companies sometimes say	Correct position
Treating direct linkage as a safe harbour	<i>"We are only linked, so our responsibilities are minimal or discretionary."</i>	Direct linkage generates an active leverage responsibility under UNGP Principle 19. It is not lesser than causing or contributing, just differently structured. A company that is directly linked and does nothing has failed its UNGP responsibilities.
Confusing context with linkage	<i>"We operate in this country or sector, so we are linked to all harms occurring here."</i>	Linkage requires a specific business relationship and a traceable nexus to the company's specific operations, products or services. Geographic or sector-level exposure is context – not connection.
Using lack of control as a defence	<i>"We do not control this supplier or partner, so we are not responsible."</i>	Control is not the test. Connection through the business relationship is. Lack of control affects leverage assessment. It does not determine whether the responsibility exists.
Using "distance" in the supply chain as an excuse	<i>"The supplier is very far away in the supply chain; there is no direct link."</i>	Distance in the supply chain is not a proxy for the quality of the connection. A company several tiers removed from the harm may be directly linked if its specific product, service or operation is identifiably connected to the mechanism of harm. A company in a first-tier relationship may not be directly linked to an adverse impact its partner causes if its specific product or service has no traceable connection to that harm.

<p>Avoiding responsibility because the product or service is replaceable</p>	<p><i>“If the product did not come from us, it would come from another supplier.”</i></p>	<p>Theoretical replaceability does not equal operational irrelevance. A company whose specific product is the established component in a harmful operation is not incidentally present simply because another supplier could theoretically substitute it.</p>
<p>Defaulting to “linked” to avoid contribution</p>	<p><i>“Our legal team has characterised this as direct linkage rather than contribution.”</i></p>	<p>The distinction is analytical, not electable. If the company business or conduct enabled or incentivised the probability or severity of the harm, the case is contribution regardless of internal characterisation.</p>
<p>Treating contractual compliance as discharge</p>	<p><i>“We have a human rights clause in the contract.”</i></p>	<p>Contractual provisions are a lever, not a discharge. The ongoing responsibility under Principle 19 is not satisfied by a signed clause that is not actively enforced or followed up.</p>
<p>Static characterisation</p>	<p><i>“Our HREDD assessment found (no) direct linkage two years ago.”</i></p>	<p>Linkage migrates as facts change. A characterisation based on conditions that have materially deteriorated is not a valid basis for the current analysis. Each material decision point requires a fresh assessment.</p>
<p>Using quantitative proxies to assess direct linkage</p>	<p><i>“We account for only 3% of their revenue, so our leverage is negligible.”</i></p>	<p>Leverage measures what can be done about a direct linkage, not whether one exists: being 3% of their revenue may limit leverage over the harm, but it does nothing to sever the connection to it.</p>

Involvement in harms is dynamic

Involvement in an adverse human rights impact sits on a dynamic continuum. The distinctions between causing, contributing and direct linkage are not fixed: a company's position can shift over time and must be reassessed at each material decision point. It is more accurate to analyse a situation as a *film* rather than a *photograph*: the characterisation may change as facts evolve and as the company acts—or fails to act.

Direct linkage can escalate to contribution when the company's own conduct, including a decision to continue a relationship unchanged, increases the likelihood or severity of harm. Three mechanisms typically drive this shift.

- **Conduct:** the most common scenario is continued engagement without a meaningful response once credible information of adverse impact exists. For example, maintaining supply, renewing contracts or expanding the relationship. Formal communications to the abusing business relationship without change are insufficient; the standard is the effective exercise of leverage to influence the actor causing harm.
- **Foreseeability:** where harmful use was not initially foreseeable, direct linkage may be appropriate; as credible evidence accumulates, foreseeability changes and must be reassessed at each decision point—original contracting does not lock in the analysis.
- **Performative leverage:** invoking leverage in form but not in substance through engagement calibrated to document effort rather than drive change or failing to use stronger leverage where it was available are not passive omissions. Both are conduct, and either can shift the characterisation from direct linkage toward contribution where the result is to materially increase the likelihood or continuation of harm.

Operational takeaways for practitioners

- **Apply the two criteria as a reasoning discipline, not a checklist.** The two criteria are a way of structuring judgement, not a form to be completed. Application requires articulating for each criterion, what is known, what is inferred, and on what basis so that the conclusion, whether it finds a linkage or rejects one, can be stated and defended under scrutiny. The value of the criteria lies in the quality of the reasoning they require, not in the verdict they appear to deliver.
- **Ask one question.** Is there a connection between this company's specific operations, products or services and this specific harm, or is the company merely present in a context where harm occurs? If you cannot articulate the connection — in either direction — the analysis is not complete.
- **Document the reasoning, not just the conclusion.** A finding of linkage and a finding of no linkage carry equal documentary weight. Record what was assessed, on what information it was based, at what point in time, and why the threshold was or was not met. An undocumented conclusion is an assertion. It will not survive scrutiny.
- **Treat every characterisation as provisional — and as a point on a continuum.** A finding made at contracting is not a permanent determination, and direct linkage is not a stable category. It is a position on a continuum that runs from linkage through contribution to causation, and a company's position on that continuum moves as facts evolve. Reapply the criteria whenever material change, such as, new information about harm, a shift in how a product or service is being deployed, a response that has demonstrably failed to produce change. At each reapplication, ask not only whether the linkage threshold is still met but whether the company's conduct or the accumulation of foreseeable risk has moved it along the continuum toward contribution.
- **Distinguish invoking leverage from exercising it; ineffective leverage is itself conduct.** A letter, an audit, a contractual reminder, or a meeting that produces no discernible change is a record of activity, not evidence of effectiveness. Where stronger leverage was available and not used, that choice is conduct. At each decision point apply an honest test: is our current response, in its substance rather than its form, reasonably capable of influencing the conduct causing harm? If the answer is no, the response must change or the relationship must be reassessed — because the gap between available leverage and leverage actually exercised is itself a factor in any contribution analysis.
- **At every decision point, ask the one question that connects everything.** Given what we know now, and given what we have done so far, where does our involvement sit on the continuum from direct linkage to contribution — and is our current response adequate to that position? If the answer requires honest engagement with uncomfortable facts, that is precisely what the framework demands.

Key considerations for policymakers

The primary legislative architecture governing mandatory HREDD is taking shape across multiple jurisdictions at an uneven pace but largely aligned with the UNGP framework. In the European Union, the CSDDD, as amended by the 2026 Omnibus package, establishes the core framework, and the decisive work has shifted to the choices member states make in transposition and to the guidance and accompanying measures that supervisory authorities and sector regulators will issue to operationalise it. Beyond the European Union, several emerging regulatory frameworks, including in Southeast Asia and Latin America, are at earlier stages but drawing explicitly on the UNGP framework as their reference standard.

Across this landscape, the choices that will determine whether mandatory HREDD produces rigorous, company-driven analysis or a new generation of tick-box compliance are no longer primarily legislative. They lie in transposition, in supervisory guidance, in accompanying measures, in enforcement priorities, and in the interpretive decisions that regulators and courts will make as the frameworks consolidate. The treatment of direct linkage is where those choices will be most consequential.

Recognise direct linkage as an operative category, not a residual one

Accompanying guidance should make explicit that direct linkage is not a lesser or discretionary form of involvement, even if no legal liability is attached to it. It generates an active, ongoing responsibility to use influence, through leverage over the relevant business relationship, and a company that identifies a direct link and takes no action has not met the standard. The risk to address here is structural: without clear guidance, companies will treat “directly linked” as the UNGP category that requires the least of them or ignore it altogether. This carries two distinct costs. The first is a missed opportunity: companies will not use their leverage to improve situations they are positioned to influence. The second cost is inaction in the face of knowledge can harden into contribution, with the heavier responsibilities and consequences that follow. Treating linkage as the category that asks the least is therefore not only a failure of ambition; it is a route by which a company can drift, unawares, into a category that asks far more.

Frame the threshold through structured, non-mechanical criteria

Guidance from supervisory authorities should explain when a connection is direct enough to trigger an expectation to act, using criteria that support analysis rather than rigid definitions. Guidance that turns the assessment into a checklist or tier-based proxy will produce results shaped more by the format than by the facts.

The key question is whether a company’s specific operation, product or service is connected to a specific harm in a way that is direct enough to require action through leverage. Answering that question requires a structured and fact-specific assessment. Criteria such as specificity and traceability can provide a practical framework, as long as they are used as reasoning tools rather than as elements of a legal test. Supervisory authorities should assess the quality of companies’ reasoning, not just the conclusions they reach.

Address the escalation from linkage to contribution explicitly

Guidance should make clear that the categories of involvement - causing, contributing and direct linkage - are not fixed at the point of initial classification. A company directly linked to an adverse impact can migrate to contribution when, knowing of its connection to a harm, it fails to use or build available leverage and continues the relationship unchanged, so that its conduct shifts from merely being connected to the harm to facilitating or incentivising its continuation.

Transposing member states and supervisory authorities should ensure that enforcement frameworks account for this escalation dynamic and member states should avoid freezing the involvement categories into static definitions. National implementing law should preserve the dynamic character of the direct linkage concept rather than codifying “directly linked” (or its directive equivalent) as a fixed status determined at a single point. Transposing legislation and accompanying explanatory materials should

make clear that a company's position can change as its knowledge and conduct change, and that obligations are calibrated to that evolving position rather than to an initial classification.

Support and recognise collective approaches to leverage

Where individual leverage is limited, whether because of commercial scale, market structure or the nature of the product or service, companies should be encouraged to act collectively with others in the same value chain or sector. Supervisory guidance should recognise good-faith participation in collective leverage initiatives as a meaningful response, while making clear that collective action supplements rather than replaces individual assessment. Member states should ensure that transposition does not inadvertently deter collective leverage-building through competition law exposure, and this tension should be addressed directly in guidance.

Further resources

Managing business relationships

GBI's Business Practice Portal

Using leverage

GBI's Business Practice Portal

Developed by business for business, these evolving resources draw on practical insights across various areas of company practice. Access the business practice portal here: gbihr.org/business-practice-portal

Annex: Direct linkage scenarios

The following scenarios are meant to further aid in company analysis about whether they are directly linked to an adverse impact, while also highlighting examples of good practice in terms of the company's response once a determination has been made.

Scenario 1 — Extractives / industrial: direct linkage through a product

A large industrial company had a government contract to supply several large transformers for an infrastructure project. Several years later, the government entity hired another contractor to dispose of them. The disposal company improperly disposed of the transformers near a river sacred to Indigenous communities, polluting the water and making it unusable for traditional ceremonies.

Is there a credible connection between the company's activities, products or services and the harm?

Yes. The company's product was improperly disposed of by a downstream contractor, but the transformer's presence in the river is the material connection to the harm.

Is this connection specific and traceable?

Yes. The connection runs from the company's product through the government's disposal decision to the adverse impact to the community. Each step is identifiable.

The company determined it was directly linked to the harm. As there is no direct contractual relationship, the company's leverage is with the government, which does have a contractual relationship with the disposal contractor. The company also considered whether it had any basis to notify the contractor directly of the harm and its expectation of remediation — not as a legal demand, since the contractual basis was absent, but as a formal communication that created a record and placed the contractor on notice that the company regarded the situation as requiring a response.

Scenario 2 – Finance / investment

A French investment company was a partial investor in an agricultural company in another country. Despite numerous NGO reports about corruption and forced displacement in the agricultural sector in that country, the investment company did not update its due diligence. Two years later, NGO reports detailed how the agricultural company had displaced dozens of families from their lands for plantation development.

Is there a credible connection between the company's activities, products, or services and the harm?

Yes. The investment company's financial stake in the plantation is credibly linked to the forcible displacement caused by the agricultural company.

Is this connection specific and traceable?

Yes. The investment finances the plantation project that is the direct cause of the displacement.

The investment company recognised it was directly linked to the adverse impact and used its leverage to encourage the agricultural company to engage in remedy with the affected families. It also adopted stricter HREDD processes for future investments. The foreseeability question is this scenario's borderline: had the company's failure to act on NGO reports been assessed earlier, the situation may have been characterised as contribution rather than direct linkage. Note: The analysis here would be similar to a joint venture.

Scenario 3 — Logistics

A regional freight company transports general cargo — food, consumer goods, construction materials — for multiple clients across a country where a government is conducting a military campaign against an ethnic minority. An NGO report documents atrocities and names the government’s military logistics operation as a key enabler. The freight company has no contract with the military, does not transport military personnel or equipment, and its routes do not intersect with documented harm sites.

Is there a credible connection between the company’s activities, products, or services and the harm?

No. The connection is geographic and sectoral — operating in the same country — not a traceable line from this company’s specific services to the mechanism of harm.

Is this connection specific and traceable?

No. There is no identifiable connection from the company’s freight operations to the conduct causing harm.

The company determined it was not directly linked. The escalation risk in this scenario is significant: as documented evidence of continuing harm accumulates and the company continues its operations, the company should document its assessment, continue to monitor the situation, and reapply the criteria if material facts change, specifically, if it receives credible information that its routes, vehicles or services are being used in connection with the military operation, or if it is approached to provide services to the government or military. At that point the analysis reopens, and the criteria must be reapplied to the new facts. The current finding of no linkage is not a permanent determination; it is the correct conclusion on the facts as they stand.

Scenario 4 — Technology / dual-use: direct linkage and the escalation to contribution

A technology company's components were found in military equipment used in a conflict zone to harm civilian populations. The government deploying the military equipment was on a sanctions list. The government was not the technology company's direct customer; the contract between the company and its customer prohibited re-sale to sanctioned locations.

Is there a credible connection between the company's activities, products, or services and the harm?

Yes. The company's technology was found in military equipment that harmed civilian populations.

Is this connection specific and traceable?

Yes, at the level of the component's function within the military system. The connection runs from the company's product through the supply chain to the military equipment to the harm.

The company determined it was directly linked but that individual leverage was limited. It engaged collectively with other companies in the sector and conducted heightened due diligence to identify early warning signs. The escalation risk in this scenario is significant: as documented evidence of the component's diversion accumulates and the company continues supply without response, the direct linkage characterisation weakens, and contribution analysis becomes required.

Scenario 5 — Supply chain: direct linkage through sourcing relationships

A catering company for a multinational's on-site cafeterias sources fruit from a large Latin American fruit company. The fruit company sources its products from smallholder farmers. Allegations emerge about instances of child labour and hazardous working conditions among the smallholder farmers.

Is there a credible connection between the company's activities, products, or services and the harm?

Yes. The catering company purchased fruit from the fruit company for use in cafeterias, creating a product connection through the sourcing relationship.

Is this connection specific and traceable?

Yes. The connection runs from the catering company's purchasing relationship through the fruit company to the smallholder farmers where the harms occurred.

The catering company determined it was directly linked. It applied its leverage with the fruit company to address the harm, including helping to remediate the affected families. Note: the multinational company whose cafeterias are served is not likely directly linked, there is no traceable connection between the multinational's own operations and the adverse impact in the smallholder supply chain.

Scenario 6 – Fashion: direct linkage through an unauthorised subcontractor

A fashion company contracted with a supplier in Southeast Asia to manufacture garments, expressly prohibiting subcontracting. The supplier nonetheless outsourced attaching zippers to a subcontractor. The women working on the zippers were migrant workers whose passports had been confiscated and who were required to work excessive overtime. A local NGO identified forced labour and linked the fashion company to the subcontractor.

Is there a credible connection between the company's activities, products, or services and the harm?

Yes. The fashion company's garments were manufactured by the supplier and the zippers attached by the subcontractor. The products connect the company's operations to the harm.

Is this connection specific and traceable?

Yes. The connection runs from the fashion company's sourcing relationship through the supplier's unauthorised subcontracting arrangement to the forced labour situation.

Despite the supplier's contract breach, the company determined it was directly linked. It used its leverage with the supplier to remedy the adverse impact to migrant workers, including ensuring the overtime was paid and passports returned.



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