

OUR HUMAN RIGHTS JOURNEY



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think
innovate

GRUNDFOS 



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ABBREVIATIONS

| | |
|--------------|----------------------------------------------------------------|
| BSR | Business for Social Responsibility |
| HRDD | Human Rights Due Diligence |
| HRIA | Human Rights Impact Assessment |
| IBHR | International Bill of Human Rights |
| ILO | International Labour Organization |
| SDGs | Sustainable Development Goals |
| UNGP | United Nations Guiding Principles on Business and Human Rights |
| UNDHR | Universal Declarations on Human Rights |

1. OUR COMPANY

PURPOSE

We pioneer solutions to the world's water and climate challenges and improve quality of life for people.

Every journey begins with a single step, and for us that step was a piston pump, Foss 1, built in 1945 by company founder Poul Due Jensen. The pump, sold to a farmer who had asked Due Jensen for a small, automated solution to his water supply problems, was the foundation of the company. Afterwards, the company expanded from producing 500 pumps in 1947 to 50,000 in 1959, and has since become one of the world's leading providers of pump solutions. Our production currently stands at more than 17 million units a year.

We are committed to protecting the environment and improving the quality of life for communities through constant technological innovation, and our pioneering breakthroughs contribute to global sustainability.

Based in Bjerringbro, we have a board of directors and day-to-day operations are run by Group Management. Both work together closely in making sure we prosper while staying true to our values and beliefs.





GRUNDFOS





2 • THE FOUNDATION OF OUR WORK WITH HUMAN RIGHTS

Companies all over the world have an impact on human rights throughout their value chains. They also have a responsibility to respect human rights and in order to live up to this responsibility, companies need to know their impacts.

Throughout our value chain, we touch millions of lives. That is a tangible, impactful responsibility. At the same time, understanding the impact and how to improve it is a never-ending journey. The world continuously changes, as does our business, our business risks and ability to positively impact specific people and communities.

At the same time, we see a rise in awareness of the role business plays and can play when it comes to human rights. Governments, investors, clients and other stakeholders increasingly require companies

to undertake human rights due diligence in accordance with international standards.

Despite these positive trends, we continue to see a challenging environment for the achievement of human rights for all. The ILO estimates that more than 40 million people around the world were victims of modern slavery in 2016 and 152 million children were engaged in child labour.

The changes we are constantly going through show us the fragility of respect for human rights. 2020 showed us that it is challenging to find the way to

Human rights cuts across almost all areas of our business in one way or another, just as human rights cuts across and beyond the Sustainable Development Goals (SDGs).

respect people's basic rights and freedoms when other rights may get at risk. We also saw the tremendous inequalities we live in and how we are lagging behind as businesses in fostering the changes we need to see happening. This is the environment in which businesses operate.

At Grundfos we have a clear ambition; to continuously improve our ability to respect human rights. Respect for human rights comes from a long tradition founded in our company values, our Code of Conduct and formulated in our Human Rights Policy.

As a company with global presence, we have global policies and global practices, but at the same time we operate in many different environments, where our exposure to human rights issues varies significantly.

Concretely, some of these issues include discriminatory practices in employment, recruiting fees, unsafe working conditions and excessive working hours. Whilst we cannot control systemic issues in the business environment of operation, we can develop mitigation measures and work with others to create lasting change across sectors and countries.

The purpose of this paper is to provide a general description of our human rights due diligence. While several other related initiatives will be mentioned if relevant, the document is not meant to include a detailed description of all our initiatives on human

rights. Human rights cuts across almost all areas of our business in one way or another, just as human rights cuts across and beyond the SDGs.

THE LINK BETWEEN THE SDGS AND HUMAN RIGHTS

Respect for human rights is the point of departure to business contribution to the SDGs. It is undeniable that in order to advance the world's sustainable development agenda, the respect for human rights should be a given and business should also look to advance the enjoyment of those rights wherever possible.

These concepts cannot be separated and for us it is important to keep in mind that our work with human rights touches upon all the SDGs in different ways and to a different extent. Our overall human rights due diligence programme contributes to the achievement of the SDGs, but in this particular document we will illustrate how the results of our human rights impact assessments affect the SDGs.

With this paper we want to share our learnings, encourage other companies to start or continue their journey and hopefully inspire others to also share with us, where we can improve on our efforts. Human rights can seem as an abstract concept indeed. And yet, it is the most tangible to the specific people whose rights are not upheld.

2.1 GRUNDFOS VALUES

Our values define who we are and what we stand for as a company. They guide our actions and serve as our cultural cornerstones wherever we are in the world.



Grundfos runs its business in a responsible and ever more sustainable way. We make products and solutions that help our customers save natural resources and reduce climate impact. We take an active role in the society around us. Grundfos is a socially responsible company. We take care of our people - also those with special needs.



In Grundfos we do what we say, and we say what we do. Our communication is open and honest among ourselves and with the world around us. We put the facts on the table – also when it is not pleasant.



Grundfos is our people. We develop the individual. Everyone in Grundfos has passion and potential. Everyone has the power to influence. Everyone must feel respected and valued.



The main shareholder of Grundfos – now and in the future – is the Poul Due Jensen Foundation. Profit is a means to growth – not a goal in itself. We ensure a healthy financial foundation at all times.



Grundfos creates value through close relations with customers, suppliers and other stakeholders. We are a global company building on local entrepreneurship. We believe that diversity drives innovation and growth.



In Grundfos we never stop challenging ourselves to create better solutions faster. We take pride in delivering premium quality in everything we do. We show leadership and innovate the future.

Our Code of Conduct includes a section on human rights and deals with specific issues such as discrimination as well as the working environment.



2.2 GRUNDFOS CODE OF CONDUCT

Grundfos is a global company, operating across cultures and traditions and across a range of legal jurisdictions.



Our Code of Conduct is an important global standard that guides us on how to do business in an ethical manner, no matter where in the world we are. We believe that honesty and integrity are universal languages that align with our core values.

Grundfos Code of Conduct includes a section on human rights, and deals with specific issues such as discrimination as well as the working environment. Published in 21 languages, the Code of Conduct has been strengthened over the years to provide more clarity; it was most recently revised

in 2019, when we also created a Quick Guide which specifically targets blue collars and the challenges that they often see.

In addition, we have a [whistle-blower system](#) that allows for suspected breaches of the code of conduct to be reported, anonymously if preferred.

The system is managed by an independent external entity and is accessible to external parties. We also have an ethics committee, an independent group created by Group Management to deal with reports from the whistleblower system.

2.3 GRUNDFOS SUPPLIER CODE OF CONDUCT

We have extended our commitment to integrity with a code of conduct for our suppliers.

The [Supplier Code of Conduct](#) includes a human rights chapter, in addition to requirements around specific areas of human rights, including discrimination, working hours, wages and benefits, forced labour and others. This document has evolved over the years and is currently being revised in 2020.

Today it explicitly requires suppliers, among other things, to conduct their own human rights due diligence.

To strengthen the impact of our Supplier Code of Conduct, in 2011 we started third-party audits of high-risk suppliers, and of low and medium risk suppliers in 2019 through a digital assessment to further widen our scope and mitigate risk in our supply chain. These audits include several aspects related to different areas of human rights. Once the audit is concluded a corrective action plan is developed and agreed with the supplier.

Subsequently, our team will follow up until remediation is achieved.



2.4 A STEP FORWARD

With the emergence of the UNGP, we initiated a more formal approach to our work with human rights.

Human rights are a material topic for the company and our management of human rights is guided by Grundfos core documents. Respecting them is not only in line with our long tradition of good business conduct, but it is also a way to comply with the growing expectations of stakeholders, including governments, which are increasingly translating human rights requirements into legislation.

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3. HUMAN RIGHTS DUE DILIGENCE

According to the UNGP, businesses should have a human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights.

3.1 GRUNDFOS HUMAN RIGHTS POLICY

Our policy is based on the IBHR as well as the ILO’s Fundamental Principles and Rights at Work.



Our corporate values are present in all our business activities and our guidance on good business ethics is our code of conduct. Our human rights policy defines what we stand for and what we expect not only from ourselves but also from our business partners. Our values and human rights policy are closely interconnected.

Our policy is based on the IBHR as well as the ILO’s Fundamental Principles and Rights at Work, and requires our partners to adhere to our commitment to respect human rights. Grundfos human rights policy is the cornerstone of our human rights due diligence and does not intend to prescribe the details of our actions but to be the foundation for the rest of the elements of our HRDD.

The Journey

2014

Published Human Rights Policy

2015

Identified Grundfos salient rights

2016

Assessed gaps between Grundfos management of human rights and the UNGP

2017

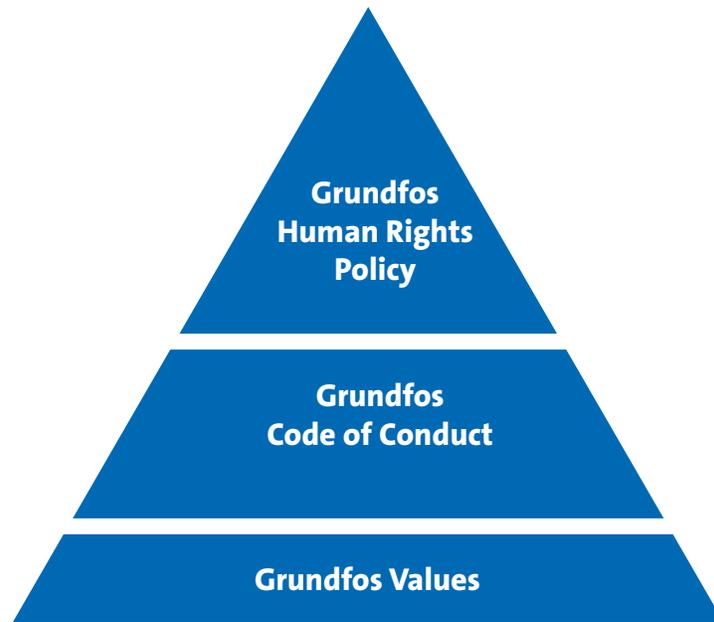
Piloted HRIA in China

2018

HRIA in India and Serbia

2019

HRIA in Mexico



Grundfos Human Rights Policy is an extension of our core documents, a continuation of our values and our code of conduct

3.2 IDENTIFYING OUR SALIENT HUMAN RIGHTS ISSUES

The scope of our work with human rights includes the IBHR as well as the ILO’s Fundamental Principles and Rights at Work.

When we embarked on our human rights journey we knew it was not about cherry picking. We also knew that we needed to prioritise so we could target our efforts and place our focus where it is needed the most. Consequently, in 2015 we initiated a company-wide human rights mapping with the support of BSR.

During this exercise we engaged representatives from different areas of our company, including Human Resources, Legal, Purchasing and the Finance departments. As a result, we gained better visibility on which ar-

reas we could potentially impact, and we defined our salient human rights issues by taking into account the likelihood, scale and severity of such impacts.

While this mapping helped us identify the areas on which we needed to focus, we know that it is of vital importance to remain open to integrate all the learnings of our work with human rights as we move forward, and keep in mind that field work will present more concrete scenarios that may not fall within the areas we had anticipated.



A company wide mapping of human rights helped us identify those rights we could potentially impact. The figure (above) includes some of our salient rights.

3.3 ASSESSING EXISTING SYSTEMS

This initial assessment of our potential impacts allowed us to make a preliminary identification of our salient human rights issues, of course with the understanding that this would be shaped by the work ahead.

However, we were still missing a clear picture of how we managed each of the relevant areas. Like many other companies, we already had systems that were an integral part of the way we managed human rights. Consequently, we partnered again with BSR to assess the gaps between our systems and the requirements of the UNGP.

As a global company, we have global policies and procedures; but in each of the more than 55 countries where we have a presence, we operate in a unique context. Therefore we decided to invite, in

addition to representatives from Grundfos head-quarters, colleagues from China, India, Mexico to participate in this exercise. These countries were selected based on their human rights risk and the size of our operation.

This gap assessment indicated that when it comes to human rights, we need to assign clear responsibilities for remediation, decision-making and allocation of resources. Today Grundfos' management of human rights is anchored in the Engagement and Responsibility Department, under the



umbrella of Group Communication & Public Affairs.

Further analysis showed that the topic touches upon many areas of the business, and consequently responsibilities are embedded in all relevant departments.

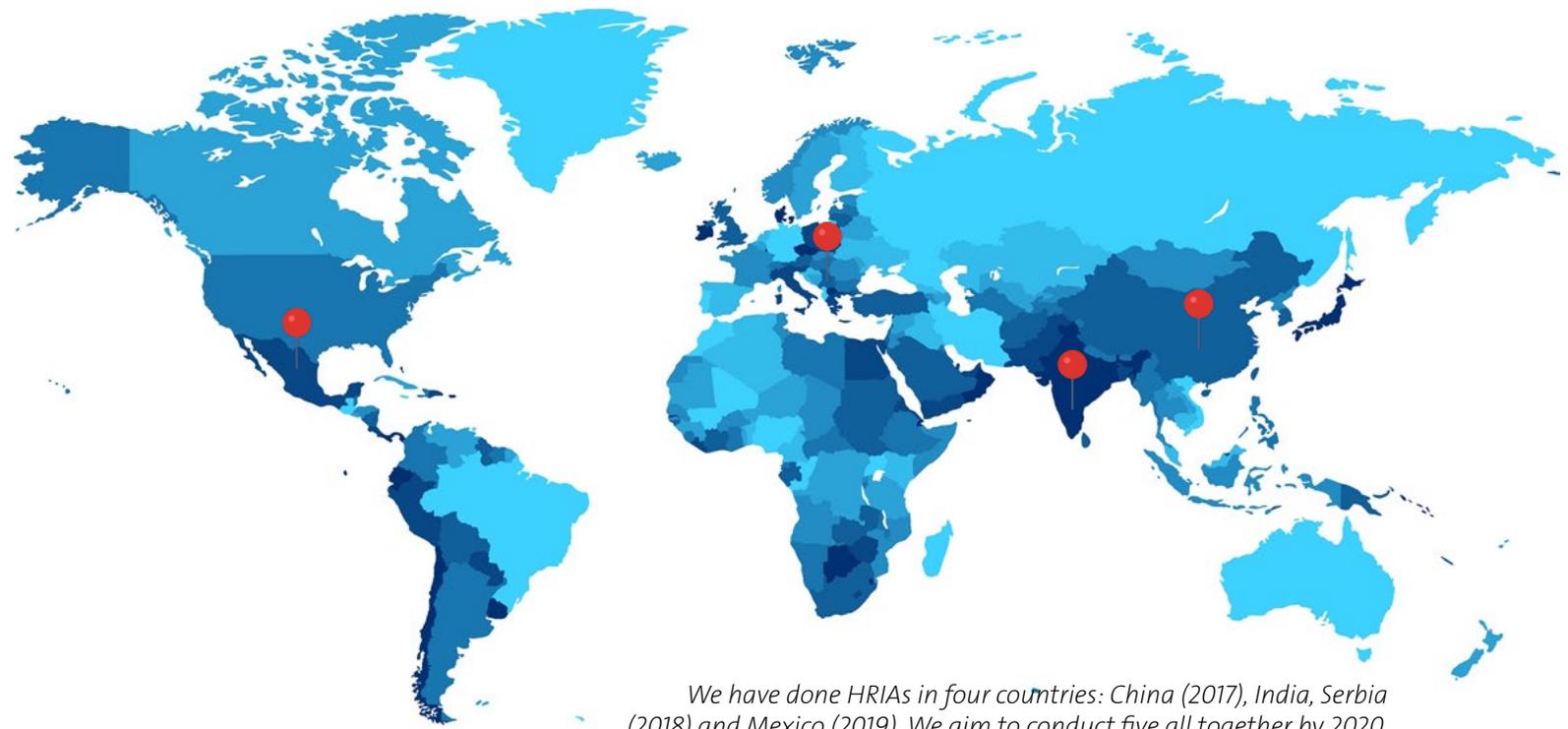
Such departments, including Human Resources and Purchasing, which are some of our key stakeholders and they are involved at different stages of our HRDD. These partnerships are essential for the integration of our HRDD across functions, as well as for building a better understanding of the relationship between business and human rights.

The topic involves many departments in different ways and while it is the Engagement and Responsibility Department that provides the general framework and extends the necessary support to each business function, it is individual departments that add the specialised knowledge to enable improvements to be implemented in practice.

This gap assessment also indicated that we needed to extend access to grievance mechanisms to external parties and enhance our reporting of our efforts to manage human rights. Today, our whistleblower function is accessible to external parties and we are using the GRI (Global Reporting Initiative) Standards as the reference framework for our reporting.

We also realised that we needed to establish indicators to monitor risk mitigation and remediation. This will go hand in hand with the site-based human rights impact assessments (HRIAs) we conduct as we move forward, and will be integrated in our reporting in the coming years.

The gap assessment also revealed that we needed to continuously assess our impacts and make this process an integral part of our due diligence, along with a prioritisation of issues. As a result, in 2017 we started a series of site-based HRIAs, starting with a pilot in China. Again, in partnership with BSR.



We have done HRIAs in four countries: China (2017), India, Serbia (2018) and Mexico (2019). We aim to conduct five all together by 2020.

3.4 HUMAN RIGHTS IMPACT ASSESSMENTS

To meet their responsibilities under the UNGP, companies are expected to assess their actual and potential impacts on human rights.

The purpose of an HRIA is to provide companies with a consistent, efficient, and systematic way to identify, prioritise, and address current and potential human rights risks and opportunities; understand such impacts and the capacity of the organisation to prevent, mitigate, remedy or address those impacts. HRIAs at higher-risk sites constitute a key aspect of our HRDD.

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China

This assessment focused on one of our manufacturing facilities in China. While we have sales offices as well as manufacturing sites in the country, we concluded that we needed to start where we saw most of the impacts could potentially happen. This was the first site-based HRIA we conducted and it provided important lessons in our future work with human rights.

Part of the aim of this assessment was to gain detailed insight into actual and potential human rights impacts at the site and in its supply chains, to learn key lessons about the HRIA process that would be valuable in rolling it out in other countries, and to increase awareness of human rights issues. The objective was also to develop a workplan to address the impacts identified, including clear allocation of responsibilities.

This pilot assessment helped us understand that, even though the concept of human rights is well-known, people will

often have different ideas of what it means in practice in a business context. It is important to understand how the human rights concept relates to our own area of work. During this pilot we learned that we need to continue to develop that understanding on a regular basis, and we learned that keeping stakeholders informed at all times and throughout all stages of the process is key to success. We underestimated the importance of these elements; the process would have been more effective if we have had more and better communication.

Global companies operate in different environments, which can affect the level of exposure to

human rights issues. As part of the HRIA process, research is done to assess what the local prevailing practices are in relation to human rights. This research includes public sources as well as input from external stakeholders.

LOCAL BACKGROUND

Child labour is still a concern, primarily in areas with labour shortages. Practices conducive of forced labour can also be observed, particularly in relation to migrants. Although female participation in China is one of the highest in Asia there are still reports of discrimination, not only based

on gender but also based on other grounds such as ethnicity or health status.

Issues around wages and benefits can also be observed but it is working hours that has been a challenge for a big majority of companies. Health and safety practices vary but management of this area tends to be weak, which has been reflected on fires or leaks in different facilities. Air pollution contributes to the deaths of an estimated 1.6 million people in China every year. As a result, health concerns related to companies' environmental impacts are increasing. Water pollution and waste management are also among the most pressing issues in China.

OUR PRACTICES

Our colleagues in China are well aware of local legal requirements as well as Grundfos global policies,

This pilot assessment helped us understand that, even though the concept of human rights is well-known, people will often have different ideas of what it means in practice in a business context.

which they use as the point of departure to protect the different human rights risk we are exposed to, in addition to other mechanisms running locally. We count with robust hiring procedures that focus on skill and rely on a more experienced local workforce. There is a strong environmental health and safety culture in place and ongoing communication between all layers of the organisation, where constant feedback is provided in addition to other formal grievance channels. On the other hand, working hours has been a challenging topic for us like it is for many other companies. As a result, our colleagues have implemented a remediation plan.

REDUCING EXTRA WORKING HOURS IN CHINA

To some employees, working overtime to earn extra cash seems like an innocuous undertaking. However, research indicates that consistently working overtime for an extended period can lead to negative psychological and physical effects.

In China, the law prescribes a 40-hour regular work week, with a monthly maximum of 36 hours overtime. Our HRIA revealed that this was an area that needed attention, so our team in China implemented a flexible working hour arrangement together with a system to monitor the amount of overtime employees are working.

Through this arrangement, each employee has a maximum of 432 hours of overtime a year, allocated flexibly throughout the year. Grundfos first sought the approval of the government and the work council for the terms of the arrangement, then consulted employees about details of its implementation, which is influenced by seasonal production flows. The company monitors each staff member's overtime every month, and reports this to managers.



Each employee has a maximum of 432 hours of overtime, allocated flexibly, every year.

Additionally, we identified specific areas where we needed to strengthen our efforts. Some examples are:

BUSINESS PARTNERS

While the assessment showed our supplier audit programme has progressed significantly, it highlighted the need to widen its scope, especially in regard to service providers. It also revealed opportunities to strengthen some areas of our existing work with product suppliers. This included raising awareness among the procurement team of the challenges that suppliers face, which led to our global procurement staff being trained on the Grundfos Suppliers Code of Conduct and some of the challenges in implementing it.

GRUNDFOS OPERATIONS

Working hours that meet legal requirements have been a challenge for many companies, including ourselves. Our pilot assessment indicated that we were occasionally exceeding the number of overtime hours that the law permits. Nonetheless, the team was very engaged in finding a solution.

Today the team in China has reduced working hours, and they are now within legal limits. Our operation in China now has a flexible work schedule that allows overtime hours to be distributed throughout the year. This is approved by the government and was agreed with the employees as well as employee representatives.



India

Our second HRIA was conducted in one of our facilities in India. We decided to partner with twentyfifty, a UK-based consultancy with vast experience conducting HRIAs in India.

We also decided to be more involved during all the stages of the process. With this second assessment we started to identify trends as some of the areas for improvement had already been identified during our pilot HRIA, for example working hours and the scope of our suppliers' code of conduct programme. The team in India has already trained leaders on working hours and is strengthening its approach to suppliers.

“Going through a human rights impact assessment allowed us to look at things through a different lens, it gave us a fresh perspective and allowed us to identify new ways to not only respect but also advance those human rights, where we have the most impact.”

George Rajkumar, India Ops & APREG Ops Strategy Director

Some reasons we chose India as our second country for an HRIA:



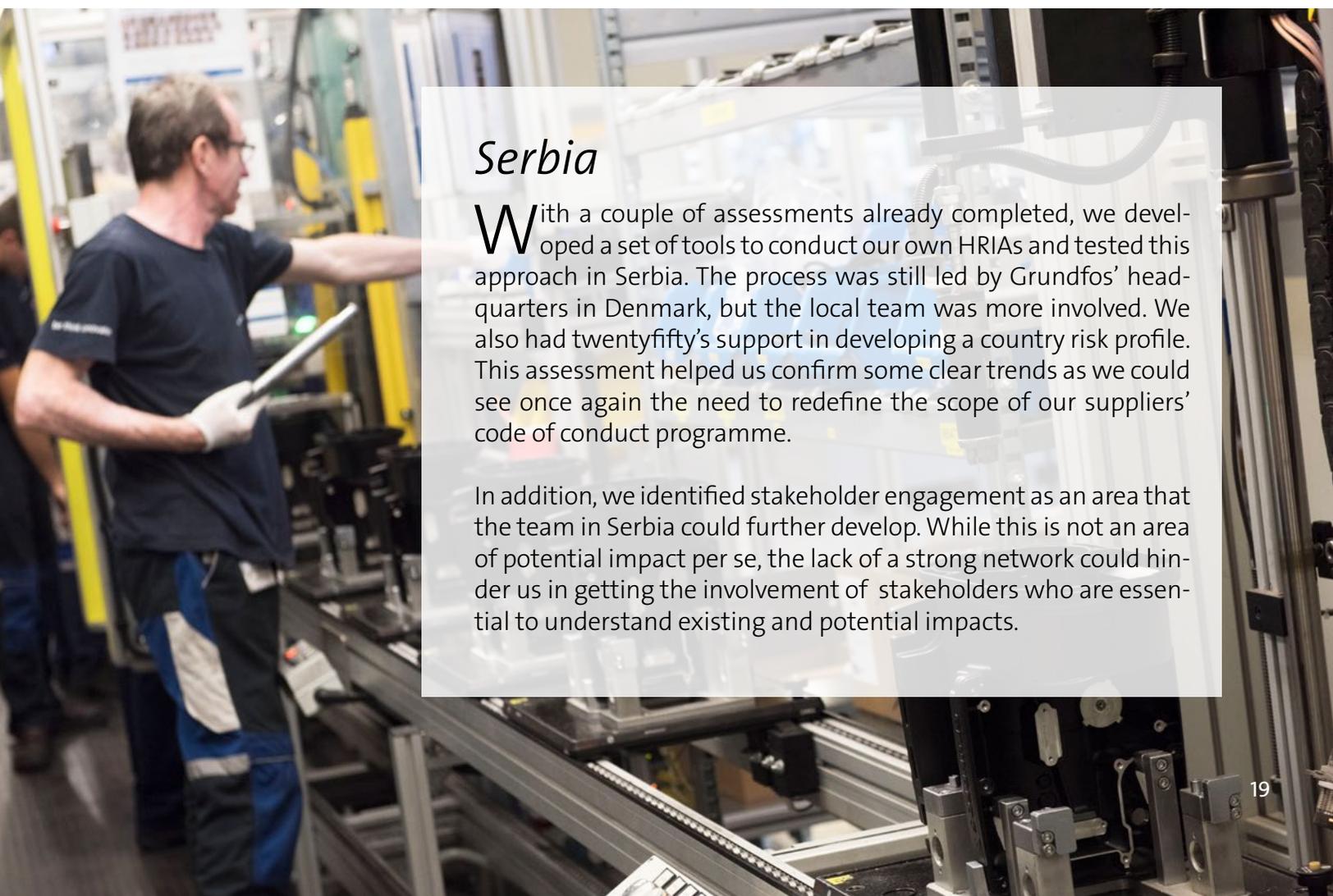
Manufacturing in India is associated with a number of human rights challenges such as discrimination, low wages, inadequately compensated overtime, forced and child labour, corruption and land rights. Iron and steel supply chains in India are also associated with additional challenges around water use and pollution.



India is one of Grundfos' fastest-growing markets with high growth targets for 2020 and new production facilities recently opened in Gujarat, in north-west India. It also plays a vital role as a regional production hub. The Chennai facility is the oldest and most established in India. First incorporated in 1998, it combines production with a sales office and employs 69 production workers and 103 office workers.



Water in the region is a particular challenge. There are ongoing disputes with neighbouring states (Karnataka) about exploiting common rivers. Every year there are incidents of rioting and road blockades linked to this issue. Due to its fast-growing population Chennai is also prone to serious and frequent drinking water disruption due to drought, floods and electricity blackouts.



Serbia

With a couple of assessments already completed, we developed a set of tools to conduct our own HRIAs and tested this approach in Serbia. The process was still led by Grundfos' headquarters in Denmark, but the local team was more involved. We also had twentyfifty's support in developing a country risk profile. This assessment helped us confirm some clear trends as we could see once again the need to redefine the scope of our suppliers' code of conduct programme.

In addition, we identified stakeholder engagement as an area that the team in Serbia could further develop. While this is not an area of potential impact per se, the lack of a strong network could hinder us in getting the involvement of stakeholders who are essential to understand existing and potential impacts.

Mexico

In 2019 we conducted an internal assessment of our manufacturing facility in Mexico.

The assessment showed that the company has taken exemplary steps to include people with limited access to the labour market in their workforce through programs like providing job opportunities to people coming out of prison in collaboration with a local NGO. Our colleagues also have a strong health and safety culture and have additional good practices such as an industry salary benchmark. All of this have a positive contribution in many areas such as

employment and equal opportunity or having a safe and healthy work environment.

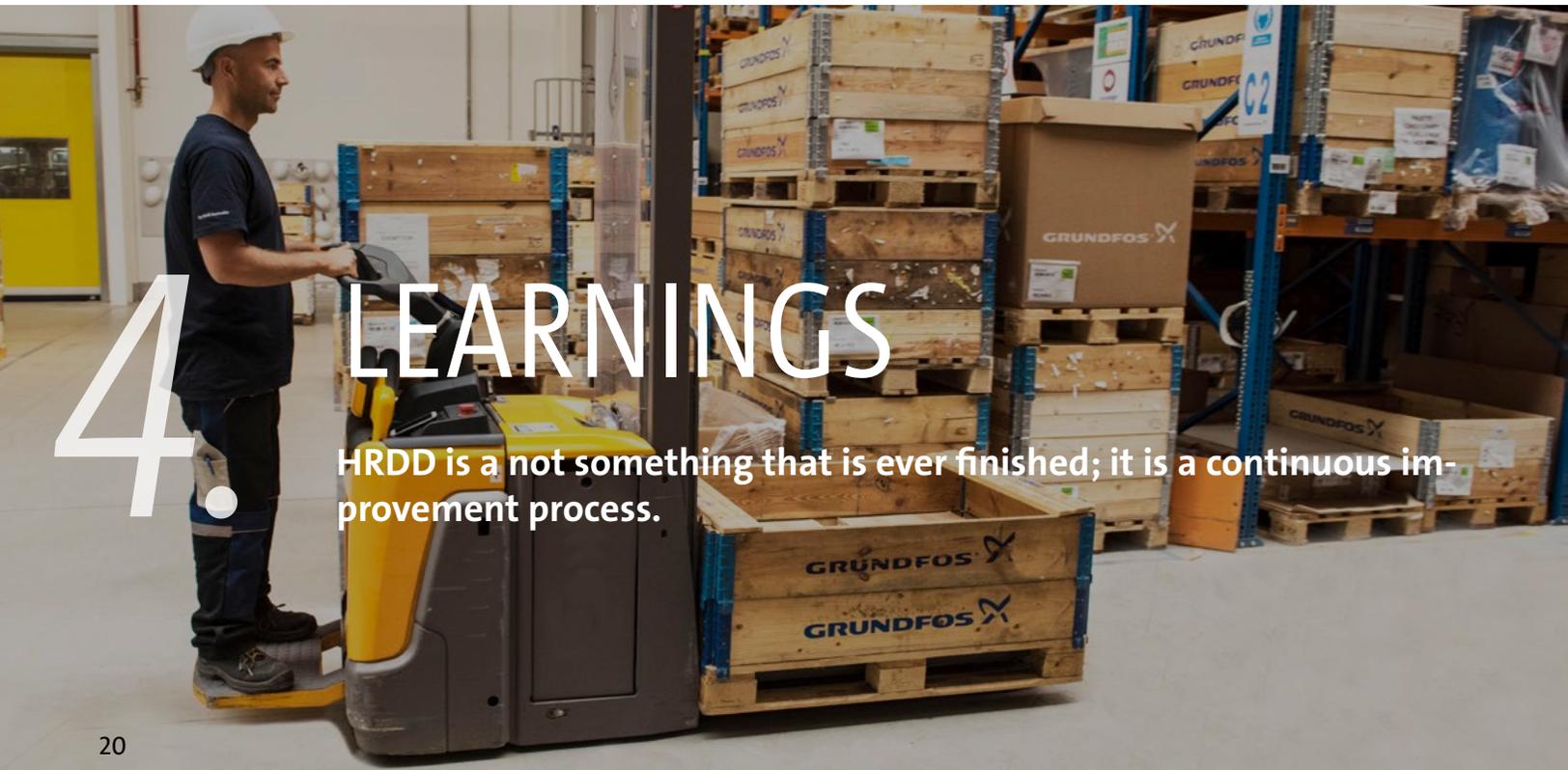
During this exercise we could also identify adverse impacts in areas such as working hours, which were occasionally surpassing ILO standards. Recruiting processes did also show opportunities for improvement as some of the elements included could be conceived as conducive of discriminatory practices. We could also verify that we need to develop mechanisms to monitor the practices of local service providers. Together with our team in Mexico we defined an action plan in order to address these issues.

In 2019 we started the development of a human rights and social impact assessment tool with the support of BSR, which will be piloted in a new business model we are starting in Ghana. The aim of this tool is to assess potential negative im-

pacts on human rights in new business models, as well as assessing positive social impact. In other words preventing potential harms and maximizing opportunities. The tool will be piloted in 2020.

4 LEARNINGS

HRDD is a not something that is ever finished; it is a continuous improvement process.



It is not about finding quick solutions, but implementing sustained change, which requires findings to be embedded in daily business activities.

Building on existing systems instead of creating new ones will ease the process of integrating human rights management into daily operations, and developing networks will maintain the momentum

and allow stakeholders to learn from and support each other.

Site-based HRIAs are a great tool to identify local areas of improvement, but they will also help identify issues that go beyond the country level, as some of the findings highlight regional or even global issues.

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THE LINK BETWEEN THE SDGS AND HUMAN RIGHTS

The Danish Institute for Human Rights says more than 90% of the SDGs are linked to international human rights and labour standards.

We were able to experience this during this process. HRIAs are also an effective tool to signal opportunities to advance the world's sustainable development agenda. While all the SDGs are closely interconnected we learned that with our work with human rights there are concrete areas where we see complex challenges as well as big opportunities.

WORKING HOURS

Studies show that excessive working hours have a negative effect on workers well-being, associating overtime and extended working hours to health

problems of different nature as well as fatigue, which can lead to injuries. This also impacts the employees' access to rest and leisure as set forth in the UDHR. Reducing working hours, in addition to meeting the requirements of the local law, and ILO standards also contributes to the achievement of SDG #8, regarding decent work for all.



SUSTAINABLE SUPPLIER MANAGEMENT

In the last years we have significantly increased the number of third-party audits of suppliers and we redesigned our entire programme and tools. Any child or forced labour issues are always given the highest priority (for additional information please look at our [2019 Sustainability Report](#)) and we work in partnership with these suppliers to remediate issues not

only in these areas but also in areas such as labour rights or employee health and safety (EHS), among many others, included on supplier third-party audits. We also use a third-party platform, where suppliers are assessed in the same areas.

We use our influence to ensure suppliers respect human rights, as it is portrayed in our Suppliers Code of Conduct and we partner with them to remediate, which has a positive impact on many areas including improving overall circumstances in the communities where our business partners are present.

We use our influence to ensure suppliers respect human rights, as it is portrayed in our suppliers code of conduct and we partner with them to remediate which has a positive impact on many areas.

On the other hand, our four assessments revealed that until now we have not considered high-risk non-product suppliers within the scope of our programme. These suppliers may pose a higher likelihood for the presence of not only child and forced labour, but also migrant labour. Some of these suppliers include employment agencies and sup-

pliers of raw materials. In addition, some suppliers deeper down the supply chain may present bigger challenges in the health, safety and environmental areas and potentially cause a negative effect on the employees' overall well-being, access to essential resources and long term damage in their communities.



PARTNERSHIPS

Our assessment in Serbia pointed out at the need to develop a local network and engage in partnerships to work more strategically with human rights. While this is not a violation of human rights it will be a good opportunity to partner with organisations focusing in the protection of human rights in order to develop strong institutions and a strong environment.



Our assessment in Serbia pointed out at the need to develop a local network and engage in partnerships to work more strategically with human rights.

REDUCING INEQUALITIES

While instances of discrimination were not observed and we have targets for women in leadership, we have an opportunity to proactively ease female access to the work floor, especially in countries where this is a challenge.

Our facility in India did not have any women on the work floor, despite their initiatives to increase female presence. While this is not a violation of human rights we believed we should be more ag-

gressive in finding effective ways to include more women in the work floor. Today, there are 4 women working in the work floor in Chennai, which brings a positive impact not only in the equality area but also in access to financial resources and training, to mention a few.



5. THE ROAD AHEAD

As part of our human rights journey, we will conduct five HRIAs by 2020.

Our work with human rights does not only focus on having adequate mechanisms in place to prevent any negative impact from Grundfos' operations, we also want to contribute to positive change and make proactive contributions wherever possible.

We will conduct five HRIAs by 2020 and will use the results to better understand the impact we have, and develop targeted solutions where needed. In addition, we will, as we move forward, identify relevant indicators and targets to measure our pro-

gress. We will assess where our major contributions could be, because we believe business not only has a duty to respect human rights, but it should also try to advance the enjoyment of those rights.

The Danish Institute for Human Rights says more than 90% of the SDG targets are linked to international human rights and labour standards.

Working with human rights is not only the right thing to do, it is a way of contributing to the development of society and the achievement of the SDGs.

“With the work we have done so far, we have more visibility on how our business impacts human rights. We are proud of our progress and the organisations commitment to continue to strengthen our approach to human rights but we are aware that we are in no way perfect and there is still a long road ahead.”

Janda Campos,
Director, Sustainability Engagement