Registry/ Registrar Human Rights Assessment Tool





Introduction to the Tool

This Human Rights Assessment Tool contains a range of scenarios and questions related to Human Rights relevant to an Internet registry/ registrar's operations, including hosting services. The tool covers the following issue areas:

Issue Areas

A. Registry/ Registrars as Employers

- A.1 Working Hours
- A.2 Wages
- A.3 Leave
- A.4 Harassment
- A.5 Employee Privacy
- A.6 Grievance Mechanism
- A.7 Forced Labour
- A.8 Child Labour
- A.9 Promoting Diversity
- A.10 Non-Discrimination
- A.11 Freedom of Association
- A.12 Workplace Health and Safety
- A.13 Intellectual property rights

B. Registry/ Registrars as Procurers of Goods and Services

- B.1 Human Rights in Supply Chain Management
- B.2 Hours, Wages and Leave
- B.3 Workplace Health and Safety
- **B.4 Forced Labour**
- B.5 Child Labour
- B.6 Non-Discrimination
- B.7 Privacy
- B.8 Intellectual property rights
- B.9 Community Impact

C. Registry/ Registrars, the Environment, and Local Communities

- C.1 Environmental Impacts
- C.2 Security
- C.3 Land Management
- C.4 Corruption and Bribery

D. Registry/ Registrars as Providers of Domain and Web Hosting Services (in-house or outsourced)

- **D.1 Acquiring Domains**
- D.2 Human Rights in Registry Engagement
- D.3 Providing Domain Names
- D.4 Maintaining Domain Names
- D.5 Amending, Transferring, and Terminating Domain Names
- D.6 Engaging with Third Parties

E. Due Diligence

- E.1 Assessing Impacts
- E.2 Responding to Impacts
- E.3 Government Requests
- E.4 Third-party Requests
- E.5 Tracking Compliance
- E.6 Transparency, Communication, and Reporting
- E.7 Access to Remedy

How to Use This Tool

This tool is a working model for assessing the human rights impacts of Internet infrastructure providers, including ccTLD and gTLD registries, registrars, and hosting providers.

If you would like to offer feedback on the model or are interested in partnering to carry out an human rights impact scoping for your business, please contact:

EPHRAIM PERCY KENYANITO (ephraim@article19.org) or EMIL LINDBLAD KERNELL (emke@Humanrights.dk)

Step 1: Complete the human rights impact scenario.

For each scenario please:

- 1. Rate the probability of the scenario taking place during one year from now across the operations of your company:
- o Does not occur
- o Isolated incidents may occur
- o Occurs systematically
- 2. Describe the key potential impacts and who is impacted.
- 3. Rate the number of individuals potentially impacted in any one year:
- o 0 500 persons
- o 500 5.000 persons
- o 5.000 persons and above
- 4. Rate the severity of the human rights consequences for the affected individuals:
- o Low
- o Medium
- o High

Step 2: Complete of the human rights compliance assessment indicators

For each question and indicator the respondant is presented with the following answer options:

- o Yes/No. The more indicators and questions the respondant is able to answer in this way, the more reliable the assessment will be.
- o F/A (Further attention required): This option is intended as a last resort if the respondant is uncertain about what the correct answer
- o N/A (Not applicable): use this option if a particular question or indicator isn't relevant for the company. Please provide an explanation

The indicators show you the kind of policies, procedures, and practices you should ideally have in place in order to answer "yes" to the

Step 3: Answer the Human Rights Compliance question

It's important that all the indicators are completed before attempting to answer the main Human Rights Compliance question.

Once all of the indicators have been completed, use the answers to assess the Human Rights Compliance question.

	as Employers ployees, including field workers and maintenance personnel, as	s well	as thi	rd-pa	rtv on	-premise staff.	
					,		
4.1 Working Ho Right to work and	ours I to just and favourable conditions at work; Right to rest and le	isure					
uman rights impac	<u> </u>		dina 48 k	hours i	a norm	al workweek or for shift work, exceeding 56 hours in a	ov one week or 48 hours average in a thr
week period). Probability (click		LXCCCC	anig 40 i	110013 11	1 4 1101111	al workweek, of for since work, exceeding 50 floars in an	Severity of consequences for
pelow to choose option)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	impacted people (click to choose option)
ndicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Normal company working hours are limited to 48 hours per week by both company policy and practice (or fewer if provided by national law, collective agreement, or industry standards).						
	Overtime is infrequent, remunerated at premium rate, and does not exceed 12 hours in any one week or 36 hours per month.						
	The registy has a system to plan, record and monitor hours worked by each employee, and regularly evaluates whether the number of employees is sufficient to meet production targets without resorting to overtime.						
	Where overtime per employee systematically exceeds 12 hours per week, the registry increases its workforce to correspond to production targets, or puts in place measures to increase worker productivity and reduce overtime.						
	Registry employees are allowed at least 24 consecutive hours of rest (or more if provided by national law or industry standards) in every seven day period.						
	The registry ensures that employees have no less than a 30-minute break for every 4 hours of work (or more if provided by national law or industry standards) and that employees are allowed to use toilet facilities whenever necessary and not just during designated breaks.						
luman rights ompliance question		YES	ΝΟ	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	sure that the workweek is limited to 48 hours; that overtime is infrequent temployees are given reasonable breaks and rest periods?						
1.2 Wages							
light to work and Iuman rights impac	d to just and favourable conditions at work; Right to adequate s t scenario	standa	ard of	living			
	le to make, at minimum, a living wage sufficient to meet the basic needs of	the em	ployee	and t	ne empl	oyee's legitimate dependents.	
robability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
ndicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry is aware of whether the legal minimum wage in the country of operation meets the requirement for a living wage in practice.						

It is company policy to provide employees with a wage sufficient to meet basic food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage).						
If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation.						
Part-time workers receive wages and benefits that are proportionate to those of full-time workers, and receive overtime compensation at a minimum of 1.25 times their hourly salary.						
The registry pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law.						
Bonus and piece-rate payment systems are monitored to ensure that the total salary paid meets living wage requirements without resorting to overtime.						
	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
to just and favourable conditions at work; Right to family life;	Right	to he	alth			
	e, and pa	aid mate	ernity le	ave (mi	inimum 14 weeks).	
Describe key impacts and who is impacted (write text)						Severity of consequences for impacted people (click to choose option)
		NO	E / A	NI/A	COMMENTS AND DOCUMENTATION	
						FOLLOW UP ACTION
Company employees are granted at least 3 weeks of paid holiday leave per year or more if required by national law or collective agreements.		NO	Г/А	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
		NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
more if required by national law or collective agreements. Part-time and short-term employees are provided with paid holiday leave proportionate to the number of hours worked, at a rate equal to that of full-time		NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
more if required by national law or collective agreements. Part-time and short-term employees are provided with paid holiday leave proportionate to the number of hours worked, at a rate equal to that of full-time employees. Employees are entitled to paid sick leave in accordance with the applicable national law. If sick leave is not provided for in national law, the registry consults with union or worker representatives to establish alternative means of protection		NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
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1	food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage). If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation. Part-time workers receive wages and benefits that are proportionate to those of full-time workers, and receive overtime compensation at a minimum of 1.25 times their hourly salary. The registry pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law. Bonus and piece-rate payment systems are monitored to ensure that the total salary paid meets living wage requirements without resorting to overtime. Devide a living wage that enables workers to meet the basic needs of rependents? It to just and favourable conditions at work; Right to family life; a scenario revided with leave, including annual paid leave (minimum 3 weeks), paid sick leave Describe key impacts and who is impacted	food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage). If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation. Part-time workers receive wages and benefits that are proportionate to those of full-time workers, and receive overtime compensation at a minimum of 1.25 times their hourly salary. The registry pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law. 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It to just and favourable conditions at work; Right to family life; Right to health a scenario revided with leave, including annual paid leave (minimum 3 weeks), paid sick leave, and paid maternity leaves the pascribe key impacts and who is impacted	food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage). If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation. Part-time workers receive wages and benefits that are proportionate to those of full-time workers, and receive overtime compensation at a minimum of 1.25 times their hourly salary. The registry pays wages at regular intervals and does not take deductions from wages for disciplinary measures or other deductions not authorised by national law. Bonus and piece-rate payment systems are monitored to ensure that the total salary paid meets living wage requirements without resorting to overtime. YES NO F/A N/A pooled a living wage that enables workers to meet the basic needs of redependents? It to just and favourable conditions at work; Right to family life; Right to health the scenario rovided with leave, including annual paid leave (minimum 3 weeks), paid sick leave, and paid maternity leave (more text)	food, clothing, and housing needs and provide some discretionary income for themselves and their dependents (i.e. living wage). If no national minimum wage is established, or if national minimum wage standards are insufficient to meet the basic needs of employees and their dependents, the registry calculates a living wage based on the cost of living in its area of operation. 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	scenario						
	r other types of physical or psychological harassment occur in the workpla	ce.					
Probability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
ndicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry has a commitment to prevent workplace harassment, and actively informs employees of their obligations to refrain from violent, threatening, or abusive conduct through a code of conduct or other behavioural guidelines.						
	The registry has an internal system for handling cases of offensive or abusive behaviour that is known by all employees. Such a system could include a designated committee.						
	Managers receive training on how to identify and deal with instances of harassment in the workplace.						
	The registry investigates all complaints of workplace harassment and takes appropriate preventative and/or disciplinary action, including reporting any criminal actions to the appropriate authorities.						
luman rights ompliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	tect workers from workplace harassment, including physical, verbal, non- rchological harassment, intimidation, abuse, or threats?						
A.5 Employee P Right to privacy	rivacy						
1.5.1 Personal dat	ta and monitoring						
A.5.1 Personal dat Iuman rights impact	scenario	emplo	vees wi	thout	a inetif	able nurnose, or in a disprepertionate man	ner
A.5.1 Personal dat Iuman rights impact		emplo	yees, wi		Assess	able purpose, or in a disproportionate man numbers impacted o choose option)	ner. Severity of consequences for impacted people (click to choose option)
A.5.1 Personal dat duman rights impact Vorkplace monitorin	scenario g or collection of employee personal data occurs without the knowledge of Describe key impacts and who is impacted	employ	yees, wi		Assess	numbers impacted	Severity of consequences for impacted people (click to choose
A.5.1 Personal dat duman rights impact Vorkplace monitorin	scenario g or collection of employee personal data occurs without the knowledge of Describe key impacts and who is impacted		yees, wi		Assess (click t	numbers impacted	Severity of consequences for impacted people (click to choose option)
A.5.1 Personal dat luman rights impact Vorkplace monitoring Probability (choose)	scenario g or collection of employee personal data occurs without the knowledge of Describe key impacts and who is impacted				Assess (click t	numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
N.5.1 Personal dat luman rights impact Vorkplace monitoring Probability (choose)	g or collection of employee personal data occurs without the knowledge of Describe key impacts and who is impacted (write text) The registry has a procedure stating what kinds of workplace monitoring are allowed; what kind of personal employee information is retained; where it is				Assess (click t	numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
u.5.1 Personal dat luman rights impact forkplace monitoring robability (choose)	g or collection of employee personal data occurs without the knowledge of Describe key impacts and who is impacted (write text) The registry has a procedure stating what kinds of workplace monitoring are allowed; what kind of personal employee information is retained; where it is stored; who has access; and why the information is necessary. Employees are made aware of all workplace monitoring, including cameras and				Assess (click t	numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
N.5.1 Personal dat luman rights impact Vorkplace monitoring robability (choose)	The registry has a procedure stating what kinds of workplace monitoring are allowed; what kind of personal employee information is retained; where it is stored; who has access; and why the information is necessary. Employees are made aware of all workplace monitoring, including cameras and Internet or e-mail monitoring, and the specific purpose of the monitoring. The registry restrains from seeking information from an individual with whom the employee has a privileged relationship (such as a former employer, doctor, or				Assess (click t	numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)

Does the registry res or monitors the work	pect the privacy of its employees whenever it gathers private information place?						
1.5.2 Sensitive pe							
luman rights impact							
he registry handles	sensitive personal data about employees without careful consultation of na	tional	and int	ernati	onal la	ws on data protection.	
Probability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted to choose option)	Severity of consequences for impacted people (click to choose option)
ndicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
1	The registry has a commitment to protect its employees' personal data.						
	The registry only gathers personal data that is lawful, proportionate and for a justifiable purpose.						
	Employees are made aware of requests to access their sensitive personal data.						
	Potential employees are made aware of access their personal data, e.g. recruiting agencies during hiring processes.						
	The registry has in place an employee whistle-blower program through which employees can report concerns on the management of their personal data.						
uman rights ompliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	nply with national and international laws on data protection in relation to						
.6 Grievance M	,						
ight to a fair hea	aring						
uman rights impact							
mployees are unable	e to file and resolve workplace grievances in a safe, transparent, and fair m	anner.					
robability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted to choose option)	Severity of consequences for impacted people (click to choose option)
dicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry has a written procedure, agreed upon with employee representatives, for how employee grievances are received, processed, and settled.						
	The procedure is open to grievances concerning all employment- and workplace-related issues.						
	All employees, including temporary or third-party employees, are able to use the procedure. $ \\$						
	Employees are clearly informed, in a language understandable to them, on how to use the procedure; which grievances can be reported; and how grievances are processed and resolved.						
	Employees are able to log grievances confidentially and without fear of retribution by management or other employees.						
	The grievance procedure is able to respond to cases of harassment by managers, including gender-specific issues such as sexual harassment.						

	hearing, processing, and settling grievances, and the committee has representation by employee representatives.						
	An employee logging a grievance is allowed to participate in hearings held with respect to their grievance, and is informed of the outcome of the grievance resolution process.						
man rights npliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	have a mechanism for hearing, processing, and settling grievances of employees?						
7 Forced Labo							
man rights impact							
rk from employee	s is obtained involuntarily and under real or perceived threat (e.g. forced over	ertime, r	ecruitme	ent fee:	s, mone	ey deposits, and retention of personal documents).	Severity of consequences for
obability (choose)	Describe key impacts and who is impacted (write text)					s numbers impacted to choose option)	impacted people (click to choose option)
		VEC	NO	E / 8	NI/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
licators	The registry ensures that all employees receive employment contracts prior to starting work, and that contracts are understood by the employees.	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Notice periods are of reasonable length and clearly communicated to workers prior to starting employment.						
	If letters of release or other documents are needed for the employee to leave employment, the registry issues such letters without delay.						
	Overtime work is paid, voluntary and not compelled through threat of pay deductions, termination or other sanctions.						
	All workers are allowed to leave premises during breaks and at the end of their shifts. In the case where workers are provided housing by the company, they may freely enter and exit their accommodation at any time.						
	The registry (or its recruiting agencies) does not require workers to pay recruitment fees or money deposits, and do not retain identity cards, passports, travel documents, or other personal items required for free movement.						
	Loans or salary advancements to employees are based on fair terms that are clearly explained to the employee, are not granted to cover basic living expenses, are limited in size, and do not require the employee to remain with the registry until repayment is completed.						
	If the registry uses prison labour, it ensures that all prison workers have been convicted by a court of law, and that the work is voluntary and supervised by a public authority.						
	The registry ensures that it does not use labour from agencies or firms involved in human trafficking or other forms of bonded labour.						
man rights mpliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
es the registry tak forced or bonded I	e all necessary measures to ensure that it does not participate in any form abour?						
8 Child Labou	r						
ghts of the child							

Probability (choose)	Describe key impacts and who is impacted (write text) Has students under 18 occasionally for "Placements," which is essentially a work-str	udy high	n school			numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
	arrangement						
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry does not employ workers under 15 years of age for full-time work, 13 years of age for light work, and 18 years of age for hazardous work.						
)	If the registry employs minors below the age of 18, the registry has a list of job functions that can safely be performed by minors.						
2	The registry is aware of local age requirements for completion of compulsory education, and does not employ workers under that age for work that may interfere with such education.						
i	The registry has a reliable procedure to check the age of young job candidates by birth certificate, other official forms of identification.						
е	Registry apprenticeship programmes do not constitute the main portion of the workforce, are limited in duration, are performed in conjunction with a school programme (or supervised by Labour Ministers or Labour Organisations), and do not interfere with the child's compulsory education.						
	If the registry becomes aware that it is employing young workers below minimum age, it ensures that they are enrolled in education programme, and that their dependents are compensated for the resulting loss of income.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry con	nply with minimum age standards?						
A.9 Promoting I	Diversity						
The right to freed	om from discrimination and harassment						
Human rights impact			lu Ale				
People from certain s	ocietal groups do not have equal opportunities to gain employment or pro	notion	in the i	registr	y or in	certain positions in the registry.	Severity of consequences for
Probability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	impacted people (click to choose option)
ndicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
1	A policy on diversity management is in place containing a commitment to have a diverse workforce.						
	The policy is supported with procedures and guidance defining responsibilities and implementations measures. $ \\$						
:	The registry has policies to account for diversity in relation to recruitment, hiring, job grade, and remuneration, and continuously monitors its performance against these benchmarks.						
d	All managers receive training in company policy and guidance on diversity management.						
2	For firms with more than 250 employees, the company has established goals and targets for representation of specific employee groups in the workforce and continuously monitors performance.						
	For firms with more than 250 employees, the company takes active steps to promote diversity and ensure equality in the workforce where discrepancies are						

	For firms with more than 250 employees, the company has established a forum, accessible and known to all employees, whereby they can register suggestions and						
	ideas for improvement in diversity management.						
uman rights Impliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
es the registry rec	ognize, value and promote the differences that individuals bring to its						
rkforce?	winstian						
10 Non-Discri	mination om from discrimination and harassment						
man rights impact							
ployee benefits and	decisions are made on discriminatory grounds, and not on the basis of qual services, promotion, termination or retirement. Grounds for discrimination can be: seo, marital, caste, health or any other status recognized by international law.)						
obability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
icators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	It is company policy to ensure that decisions concerning hiring, wages, promotion, training, discipline, retirement, and termination are based only on unbiased criteria.						
	Each job category has a written description stating the skills and qualifications required for that job category, as well as the projected paygrade.						
	Employment advertisements do not reference discriminatory criteria, such as race, gender, or age (unless listed as part of a legal equal opportunities promotion).						
	Job applicants are not asked to give information about their marital status, pregnancy, intent to have children, number of dependents, or similar information that may lead to discriminatory hiring decisions.						
	All hiring managers receive non-discrimination training regarding the company's policies.						
	The registry takes reasonable steps to enable qualified persons with disabilities or health conditions to gain employment opportunities with the registry, for example allowing wheel chair access, flexible working hours, longer breaks etc.						
man rights mpliance guestion		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
es the registry ens	ure that employment-related decisions are based on relevant and						
ective criteria? 11 Freedom o	f Association						
ht to freedom	of association						
man rights impact							
	 allow employees to organize and to bargain collectively, and employees an e-unions are uncommon and suppressed). 	re expo	osed to	harass	ment o	r retaliation based on their union affiliation or	non-affiliation (including in countries o
bbability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
dicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
				-,-	,		

a b c d e	The registry has a commitment to recognise the rights of its workers to freedom of association and collective bargaining, including the right to freely form and/or join independent trade unions, and this commitment is clearly communicated to all employees. The registry recognises workers' organisations for collective bargaining purposes and has procedures in place to ensure regular collective bargaining with authorised worker representatives concerning all workplace related issues. The registry allows worker representatives access to collective bargaining agreements, registry premises, employees, and other relevant documentation needed to fulfil their duties. The registry prohibits discrimination or adverse actions against worker representatives or employees for participating or refraining to participate in lawful trade union activities. The registry has agreed with workers' representatives about fair hearing requirements in relation to all disciplinary cases and employee grievances. The registry allows employees to engage in regular employee-only meetings within normal working hours, where employees can discuss concerns regarding working					
g	conditions. Where independent trade unions are prohibited by law or otherwise absent, the company informs employees of their right to form independent collective representation at the workplace. The company informs employees of their right to engage in regular collective					
i	bargaining concerning all workplace issues. Company management meets regularly with employee representatives to discuss work-related problems and any grievances employees may wish to raise.					
	ognise the rights of its workers to freedom of association and to bargain	YES NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	Health and Safety I to just and favourable conditions at work; Right to adequate he	ealth; Rig	ht to li	fe		
	ed to unsafe or unhealthy working environments, resulting in accidents or p	ersonal inji	ury.			
Probability (choose)	Describe key impacts and who is impacted (write text)			Assess numbers impa (click to choose optic	acted on)	Severity of consequences for impacted people (click to choose option)
Indicators	The registry has effective health and safety procedures in place, which comply	YES NO	F/A	N/A COMM	MENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b	with industry, national, and international standards. Health and safety information and procedures are available to employees in a language they understand.					
c	Responsibilities for health and safety tasks are clearly defined.					
d	Health and safety incidents are reported and investigated, and a confidential procedure is in place for receiving and handling health and safety complaints from employees.					
e	The registry routinely monitors its production processes, machinery, and equipment to ensure that they are safe and in good working order.					

1							
f	Workers and managers are trained to respond to workplace emergencies; first aid kits and fire extinguishers are readily available; and escape exits are clearly marked and free from obstruction.						
g	The workplace is maintained to ensure clean and comfortable conditions including a suitable temperature, ventilation and lighting; suitable washing and sanitation areas appropriate for both genders are provided.						
h	Where relevant, residential or overnight facilities are safe and sanitary and meet the basic needs of workers in regard to safety, space, temperature, lighting, ventilation, food, water, sanitary facilities, privacy, and affordability.						
i	The registry provides safe drinking water for all employees and facilities for clean and sanitary food storage and eating.						
j	Where relevant, the registry has put in place special health and safety precautions for pregnant women, employees with disabilities, night workers, young workers, and other vulnerable groups.						
k	The registry has a procedure to ensure that all employees are provided with the equipment and training necessary to safely perform their job (e.g. ergonomic seating and work stations, protective equipment, etc.)						
I	Employees are kept fully informed, in a language and form understandable to them, of any health and safety risks associated with their job functions, including requirements for protective equipment.						
m	At a minimum of every two years, and when assigned to new tasks, employees receive training by a knowledgeable expert in the safe use of equipment and processes, and a record is kept of who has been trained for which tasks.						
Human rights compliance question	1	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	sure that its workers are afforded safe, suitable, and sanitary work						
A.13 Intellectu	al Property Rights						
Right to intellect							
Human rights impac							
Employees are not o	compensated for inventions or other works generated in whole or in part by	tnem.					Coverity of consequences for
Probability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted to choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has a policy on ownership of the intellectual property rights for inventions or other works, which has been agreed upon by employees and (where applicable) their representatives.						
b	The registry has an agreement with its employees about how intellectual property rights for products created or invented wholly or in part by employees are to be shared.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
inventions or other	otain employees' informed consent and provide them with compensation for works generated by them entirely or in part?						
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	As part of its due diligence processes, the company contacts the appropriate patent offices to obtain information about inventions it may wish to use.						
	patent offices to obtain information about inventions it may wish to use.						

b The company obtains authorization from patent holders before profiting from any locally patented ideas or products.						_
Human rights compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the company obtain authorization from existing patent holder(s) before commercially exploiting any locally patented invention?						
Probability						
Does not occur						
Isolated incidents may occur						
Occurs systematically						
Scale of impact						
0 - 500 persons						
500 - 5.000 persons						
5.000 persons and above						
Severity						
Low						
Medium						

High

	es as Procurers of Goods and Services					
Applies to Tier I	suppliers, and to lower-tier suppliers where a significant part of their produc	tion goes to	the re	egistry.		
3.1 Human R	ights in Supply Chain Management					
luman rights imp	pact scenario ndards (e.g. on employee treatment, community impact and consumer rights) a	ro not adoqu	ıatoly	promoted is	interactions with suppliers and business na	tnorc
Probability (click		re not adequ	lately	<u> </u>	nbers impacted	Severity of consequences for
pelow to choose	(write text)				oose option)	impacted people (click to choose option)
, peron,						choose operon,
ndicators		YES NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry has a commitment to promote the continuous improvement of human rights standards of its suppliers.					
	Training on human rights standards is provided for relevant management and procurement staff.					
	The registry has conducted an assessment of its supply chain to identify which suppliers have the greatest risk of abusive human rights conduct.					
	The registry has defined minimum requirements for the human rights standards of suppliers.					
	Where necessary, the registry collaborates with individual suppliers to implement continuous improvements of human rights standards.					
	The registry's procurement practices—such as prices, delivery times and internal incentive structures—encourage improved human rights in suppliers and business					
luman rights	partners.					
ompliance quest	ion	YES NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	promote international human rights standards (e.g. employee, community and in its interactions with suppliers and business partners? $$					
3.2 Hours, W	ages, and Leave					
ight to work a	and to just and favourable conditions at work; Right to rest and leis	ure; Right	to a	dequate st	candard of living; Right to family life; P	light to health
uman rights imp cenario	pact					
upplier employe	es are exposed to:					
salaries that do no	hours, excessive overtime and lack of rest periods; it constitute a living wage sufficient to meet the basic needs of the employee and the emp	loyee's legitin	nate de	ependents; or		
	l leave, paid sick leave and paid maternity leave.					
robability	Describe key impacts and who is impacted			Assess num	nbers impacted	Severity of consequences for
ndicators		YES NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry has defined minimum requirements concerning working hours, overtime, rest periods, wages, and leave.					
	These minimum requirements are communicated in writing to new and existing suppliers and business partners.					
	There is a process in place to follow up on these commitments.					

Does the registry promote labour standards on working hours, overtime, rest periods, wages and					
leave in its interactions with suppliers and business partners?					
B.3 Workplace Health and Safety Right to work and to just and favourable conditions at work; Right to health					
scenario					
Supplier employees are exposed to unsafe or unhealthy working environments, resulting in accid	ents or pe	rsonal	injury.		
Probability Describe key impacts and who is impacted			Assess n	numbers impacted	Severity of consequences for
Indicators	YES N	O E/A	NI/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
The registry has defined minimum requirements concerning workplace health and	TES IV	U F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-OF ACTION
safety in its selection of suppliers and business partners.					
b These minimum requirements are communicated in writing to new and existing suppliers and business partners.					
There is a process in place to follow up on these commitments.					
compliance question	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Does the registry take steps to ensure that employees of its suppliers are afforded safe, suitable					
and sanitary work facilities? B.4 Forced Labour					
Right to freedom from forced labour and servitude					
scenario					
Work from supplier employees is obtained involuntarily and under real or perceived threat (e.g. Fo	rced overti	me, Rec	ruitment fe	es, Money deposits and Retention of personal docume	ents).
Probability Describe key impacts and who is impacted				numbers impacted	Severity of consequences for
				·	
Indicators	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Indicators	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Indicators a	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Indicators a b	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Indicators a b c	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Indicators a b c compliance question		O F/A		COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION FOLLOW-UP ACTION
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any					
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour?					
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour					
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child					
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario	YES N	O F/A	N/A		
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario	YES N	O F/A	N/A		
a b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18	YES N	O F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted	FOLLOW-UP ACTION Severity of consequences for
b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 16 Probability Describe key impacts and who is impacted	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted	FOLLOW-UP ACTION Severity of consequences for
b c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted Indicators The registry has defined minimum requirements concerning minimum age in its	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted	FOLLOW-UP ACTION Severity of consequences for
c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted Indicators a The registry has defined minimum requirements concerning minimum age in its selection of suppliers and business partners. These minimum requirements are communicated in writing to new and existing	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted	FOLLOW-UP ACTION Severity of consequences for
c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted Indicators a The registry has defined minimum requirements concerning minimum age in its selection of suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners.	YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted	FOLLOW-UP ACTION Severity of consequences for
compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted Indicators a The registry has defined minimum requirements concerning minimum age in its selection of suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. compliance question Does the registry take necessary measures to ensure that its suppliers comply with minimum age	YES N YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION Severity of consequences for FOLLOW-UP ACTION
c compliance question Does the registry take necessary measures to ensure that its suppliers do not participate in any form of forced or bonded labour? B.5 Child Labour Rights of the Child scenario Suppliers employ children or minors (below the age of 15 years for full-time work and below the age of 18 Probability Describe key impacts and who is impacted Indicators a The registry has defined minimum requirements concerning minimum age in its selection of suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. C There is a process in place to follow up on these commitments.	YES N YES N	O F/A	N/A us work). Assess n	COMMENTS AND DOCUMENTATION numbers impacted COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION Severity of consequences for FOLLOW-UP ACTION

	o freedom from discrimination and harassment				
lated to: recr	loyees are exposed to harassment or employment related decisions made on discriuuitment, compensation, access to training, employee benefits and services, promotion, termironal or social origin, political or other opinion, trade union membership, and marital caste, hea	nation or retirement	Grounds for o	iscrimination can be: sex, race, colour, disability, re	
obability	Describe key impacts and who is impacted	neri or any other sta		nbers impacted	Severity of consequences for
,					
dicators		YES NO F/A	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry has defined minimum requirements concerning non-discrimination and non-harassment in its selection of suppliers and business partners.				
	These minimum requirements are communicated in writing to new and existing suppliers and business partners.				
npliance q	There is a process in place to follow up on these commitments.	YES NO F/	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
es the regi	stry take necessary measures to ensure that its suppliers prohibit harassment and nent-related decisions on relevant and objective criteria?				
7 Privac ght to pri					
enario	vacy				
	place monitoring or collection of employee personal data occurs without the knowl	ledge of supplier			
	Describe key impacts and who is impacted		Assess nui	nbers impacted	Severity of consequences for
obability	· · · · · · · · · · · · · · · · · · ·				Jerems, J. Companyageness .
bability					,
		YES NO F/		•	
	The registry has defined minimum requirements concerning privacy in its selection of suppliers and business partners.	YES NO F/		COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
				•	
dicators	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments.	of	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
licators mpliance q	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion	yes no F/A	A N/A	•	
npliance q es the regi 8 Intelle	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard ectual Property Rights	yes no F/A	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
npliance q es the regi 8 Intelle	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard	yes no F/A	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
mpliance q es the reg 8 Intelle ght to intenario	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard ectual Property Rights	YES NO F/S	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
mpliance q es the regi 8 Intelle ght to intenario ployees of	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard sectual Property Rights ellectual property, right to security,	YES NO F/S	A N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION FOLLOW-UP ACTION
mpliance q es the regi 8 Intelle ght to intenario ployees of	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard sectual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, e	YES NO F/S	A N/A	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION FOLLOW-UP ACTION
mpliance q es the regi 8 Intelle ght to intendice ployees of obability	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard sectual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, e	YES NO F/	A N/A A N/A A Assess nu	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION mbers impacted	FOLLOW-UP ACTION FOLLOW-UP ACTION Severity of consequences
mpliance q es the regi 8 Intelle ght to intendice apployees of apployees of	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard ectual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, or Describe key impacts and who is impacted	YES NO F/S	A N/A A N/A A Assess nu	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION FOLLOW-UP ACTION
mpliance q es the regi 8 Intelle ght to intendice ployees of obability	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard sectual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, e	YES NO F/	A N/A A N/A A Assess nu	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION mbers impacted	FOLLOW-UP ACTION FOLLOW-UP ACTION Severity of consequences to
mpliance q es the reg 8 Intelle ght to intenzio	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. Lestion Stry take necessary measures to ensure that its suppliers comply privacy standard ectual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, expected by them, expected by them, expected by the property impacts and who is impacted The registry has considered a preference for free and open-source software and hardware to enhance security and reduce potential unforseen intellectual property	YES NO F/	A N/A A N/A A Assess nu	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION mbers impacted	FOLLOW-UP ACTION FOLLOW-UP ACTION Severity of consequences f
mpliance q es the regi 8 Intelle ght to intendicention	suppliers and business partners. These minimum requirements are communicated in writing to new and existing suppliers and business partners. There is a process in place to follow up on these commitments. uestion stry take necessary measures to ensure that its suppliers comply privacy standard ctual Property Rights ellectual property, right to security, suppliers are not compensated for inventions or other works generated by them, or Describe key impacts and who is impacted The registry has considered a preference for free and open-source software and hardware to enhance security and reduce potential unforseen intellectual property claims. The registry has defined minimum requirements concerning intellectual property in i	YES NO F/	A N/A A N/A A Assess nu	COMMENTS AND DOCUMENTATION COMMENTS AND DOCUMENTATION mbers impacted	FOLLOW-UP ACTION FOLLOW-UP ACTION Severity of consequences f

property rights s	take necessary measures to ensure that its suppliers comply with intellectual						
B.9 Commun	ity Impact						
	uate health, Right to adequate standard of living						
scenario							
Environmental im	pacts of suppliers leading to health problems, reduced livelihoods, and reduced	access t	to sa	fe wa	ter for	local communities occur.	
Probability	Describe key impacts and who is impacted				Assess	numbers impacted	Severity of consequences for
							·
		V=0			21/2		EQUI OW UP ACTION
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry has defined minimum requirements concerning environmental impacts and hazards in its selection of suppliers and business partners.						
b	These minimum requirements are communicated in writing to new and existing suppliers and business partners.						
c	There is a process in place to follow up on these commitments.						
compliance quest	tion	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	take necessary measures to ensure that its suppliers have a procedure to assess environmental impacts of its operations on the human rights of local	s					
Probability							
Does not occur							
Isolated incidents may occur							
Occurs systematically							
Scale of impact							
0 - 500 persons							
500 - 5.000 persons							
5.000 persons and above							
Severity							
Low							
Medium							
High							

	nental Impacts						
ight to adequuman rights im	uate health; Right to adequate standard of living						
nvironmental in	npacts leading to health problems, reduced livelihoods, or reduced access to safe wate	er for lo	cal comi	munitie			
robability :hoose)	Describe key impacts and who is impacted (write text)					umbers impacted choose option)	Severity of consequences for impacted people (click to cho option)
uman rights Impliance ques	stion	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
es the registry hts of local co	y have a procedure to assess and address the impact of its operations on the human						
dicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	The registry follows international environmental standards or local law, whichever provides the highest standard.						
	Before starting new operations or developments, the registry conducts an impact study to assess the potential environmental and social impacts of the planned activities, including an assessment of their potential human rights consequences for local inhabitants or other affected communities.						
	The registry has a method for identifying the individuals who are likely to be affected by such impacts, and engages in consultation with those individuals prior to, during, and after carrying out the operations.	-					
	The registry shares the findings of its social and environmental impact assessment studies with the affected individuals in a form and language accessible to them.						
	The registry provides or collaborates in an accessible, effective, fair, and transparent mechanism to receive and resolve grievances from potentially affected individuals.						
	In consultation with the affected individuals, the registry develops appropriate management plans to prevent, reduce, and mitigate adverse social and environmental impacts.						
	The registry continuously monitors its social and environmental impacts and provides updated information about the social and environmental impacts of its operations, such as through an annual report.						
	The registry has clear procedures in place for waste management, including e-waste management.						
.2 Security ight to freed uman rights im	om from torture, degrading treatment, or punishment; Right to life, libe	rty, an	d secu	rity of	person		
	es are exposed to harassment, intimidation, use of force, or other improper treatment ed by the registry.	by priv	ate seci	urity gu	ards, pol	lice, or military providing security for company p	ersonnel or for assets that are ow
obability	Describe key impacts and who is impacted				Assess n	umbers impacted	Severity of consequences for
mpliance ques	stion	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	y take steps to ensure that company security arrangements are in accordance with man rights principles for law enforcement and the use of force?						
dicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION

The company regularly conducts security risk assessments and ensures that company security arrangements, including the deployment of private guards or public security personnel, are proportionate to the security risk.

Company security risk assessments include an assessment of the risk of human rights abuses by private and public security personnel in the country or areas of operation.

The company selects private security firms based on information about professional

The company selects private security firms based on information about professional ability, level of staff training, quality of equipment, past involvement in human rights abuses, links with political factions or organisations, and other relevant criteria.

Contracts with private security firms include requirements related to international human rights standards for law enforcement and use of force; require the investigation and discipline of any unlawful or abusive conduct by security guards; and allow for termination of the contract in case of such conduct.

There is a manual defining the duties of security personnel, and all security personnel receive training on rules of conduct based on international human rights standards for law enforcement and the use of force.

Where public security personnel are assigned to company facilities, the company seeks to ensure transparency concerning its interactions with public security agencies, and the company communicates to the relevant public security agencies its desire that security functions be conducted in accordance with international human rights standards for law enforcement and the use of force.

The company has a procedure for recording security-related incidents, including a mechanism for handling complaints from staff or local communities related to the conduct of security personnel, and forwards credible allegations of abuses to the relevant authorities

The company has a procedure for monitoring and evaluating its security arrangements, including the proportionality of the security arrangement; impact on local communities; impact on existing local tensions or conflicts; security incidents recorded; and credible allegations of abuses by registry security personnel.

Representatives from the local community are consulted as part of the aforementioned monitoring.

C.3 Land Management

Right to own property; Right to adequate housing; Right to adequate standard of living

Human rights impact scenario

Acquisition, leasing, or renting of land or property leads to improper displacement of owners, residents, or users without adequate prior informed consultation or without adequate compensation.

Probability Describe key impacts and who is impacted Assess numbers impacted Severity of consequences for

compliance question	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
Before buying, renting, acquiring or otherwise accessing land or property, does the registry ensure that all affected owners and users of the land or property, have been adequately consulted and compensated?						
Indicators	YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION

Prior to buying, renting, acquiring, or otherwise accessing land or property, whether directly or through a third party, the company identifies all existing owners and users or of the land or property.

The company investigates the past usage and ownership of the land or property to ensure that past users and owners have not been wrongfully removed, and that any expropriations by the authorities have been conducted in accordance with international law.

The company consults with affected users and owners of the land or property (including women, tenants, settlers, minorities, and other vulnerable groups) and seeks their free and informed consent before continuing to acquire or access the land or property.

The company ensures that affected owners and users of the land or property are adequately compensated, at or above market replacement rates, for the land or property. This includes compensation for damages to land, damages to assets, and loss of income.

C.4 Corru	ption and	Briberv

C.4 Corrupt	ion and Bribery					
compliance que	stion	YES	NO	F/A	N/A	A COMMENTS AND DOCUMENTATION FOLLOW-UP ACTION
Does the registr	ry evaluate and assess the risk of corruption when doing business?					
Right to acce	ss to information; Right to take part in in government					
Indicators		YES	NO	F/A	N/A	A COMMENTS AND DOCUMENTATION FOLLOW-UP ACTION
a	The registry informs all employees of its anti-corruption commitment.					
b	The registry provides anti-corruption training at all levels within the organization.					
С	Information on disciplinary procedures for violations of company anti-corruption policies is available to employees.					
d	The registry actively seeks employee feedback and dialogue on its anti-corruption initiatives.					
е	The registry has and promotes a function (e.g. hotline or mailbox) through which employees can safely report suspicion of corruption-related cases, and allocates resources to systematically address the issues that are identified.					
f	The registry evaluates the potential areas of corruption including factors such as type of transaction, countries of operation, industries, and customers or business partners involved.					
g	The registry evaluates the risk of corruption when employees, agents, intermediaries, or consultants deal with public officials, including employees of state-owned companies.					
h	The registry evaluates the risk of internal and external conflicts of interest in relation to business partners and government officials, including employees of state owned companies.					
i	The registry has developed an action plan to address the risk of corruption, and has defined responsibilities for each task including detailed policies for high-risk areas.					
j	With regards to internal functions, the registry has identified the weakest spots for corruption within the registry and seeks to address them.					
k	The registry shares experiences, procedures, and challenges of corruption with other organizations i.e. the local business community, sector initiatives, networks, etc.					
ı	The registry has initiated or joined initiatives with other companies in the same sector for the purpose of promoting a fair business environment.					
m	The registry encourages the local business community and business partners to initiate cooperation to fight corruption.					

Probability

Does not occur

Isolated incidents may occur

Occurs systematically

Scale of impact

0 - 500 persons

500 - 5.000 persons

5.000 persons and above

.

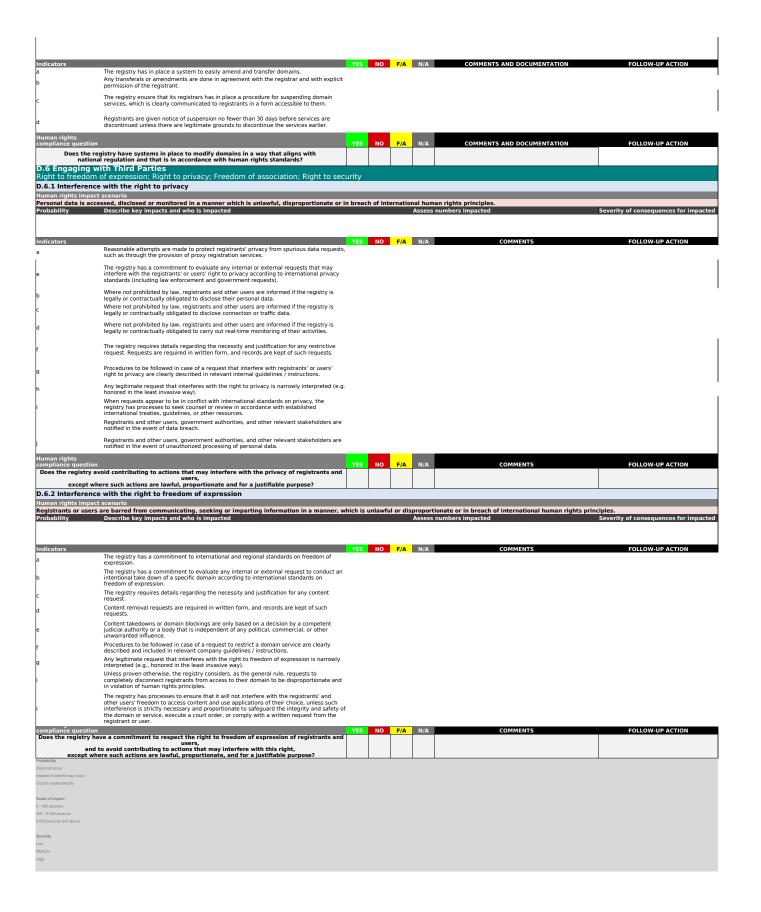
Low

Medium

High

D. Registries	s as Providers of TLD and Other Domain Services (in	n-hous	e or ou	utsour	ced)	
D.1 Acquiring D Right to freedom D.1.1 Agreements	of expression; Right to privacy; Freedom of association; Freedom fro	om discri	mination	n		
Human rights impact					!	
Probability	Describe key impacts and who is impacted	рпуасу а	nu needo		numbers impacted	Severity of consequences for impacted
(choose)	(write text)			(click to	o choose option)	Severity of consequences for impacted people (click to choose option)
		vea		31/4		
Indicators a	Information added to the public WHOIS registry is in line with local and international law, as well as human rights.	YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b	Information added to the public WHOIS registry is minimized to safeguard registrants' privacy.					
c	The agreement with ICANN includes a commitment to respect international human rights					
d	The agreement with ICANN includes a commitment to respect the right to privacy of registrars and registrants.					
e	The agreement with ICANN includes a commitment to respect the right to freedom of expression of registrars and registrants. The agreement with ICANN includes a commitment to respect the right to freedom of					
f	association of registrars and registrants. The agreement with ICANN includes a commitment to ensure the right to freedom from					
g Human rights	discrimination of registrars and registrants.					
compliance question Are relevant hu	ıman rights issues a part of the agreement between the registry and ICANN?	YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	s with government					
Human rights impact Agreements between	t scenario n the registry and government(s) do not cover how the registry should align itself	with hum	an rights,	including	on issues such as freedom of expression and rig	ht to privacy, in its terms and conditions.
Probability	Describe key impacts and who is impacted			Assess	numbers impacted	Severity of consequences for impacted
Indicators Relevance question	Does the registry have any agreements with the government?	YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	Agreements with government(s) includes a commitment to respect international human rights.					
b	Agreements with government(s) include a commitment to comply with the right to privacy of registrars and registrants.					
с	Agreements with government(s) include a commitment to comply with the right to freedom of expression of registrars and registrants.					
d	Agreements with government(s) include a commitment to ensure the right to freedom of association of registrars and registrants. Agreements with government(s) include a commitment to ensure the right to					
e Human sights	freedom from discrimination of registrars and registrants.					
Human rights compliance question		YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
D.2 Human Rigi	nts integrated into the agreement between the registry and government(s)? onts in Registrar Engagement					
	of expression; Right to privacy; Freedom of association; Freedom fro ts in interactions with registrars	om discri	mination	1		
Human rights impact Human rights standa	t scenario ards are not adequately promoted in interactions with registrars.					
Probability	Describe key impacts and who is impacted			Assess	numbers impacted	Severity of consequences for impacted
Indicators a	The registry has a commitment to promote the continuous improvement of human rights standards of its registrars.	YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b	If included, this commitment is supported by training on human rights standards for relevant staff.					
c	The registry has defined minimum requirements for the human rights standards of registrars and communicates these in writing to new and existing registrars.					
d	The contract(s) between registry and registrars commits registrars to avoid contributing to actions that may interfere with the right to privacy of registrants or other users, except					
e	where such actions are lawful, proportionate, and for a justifiable purpose. The contract(s) between registry and registrars includes a commitment to respect international human rights, such as the right to privacy, freedom of expression, freedom					
	from discrimination, and freedom of association. In relation to take downs and blocking of specific domains, the contract(s) between registry and registrar scommits registrars to respect the right to freedom of expression of					
Ī	registrants, and to avoid contributing to actions that may interfere with this right, except where such actions are lawful, proportionate and for a justifiable purpose.					
g	The contract(s) between registry and registrars commits registrars to maintain openness and the free flow of information over the internet except in few, exceptional, and limited circumstances prescribed by international human rights law, such as in the case of abusive or discriminatory content.					
h	The registry has in place procedures for ongoing monitoring of registrars' compliance with the requirements set out in the contract.					
i	The contract(s) between the registry and registrars contain provisions for the registrar to inform the registry in the case that the registrar is not willing to delegate specific domains on the basis of legitimate and reasonable grounds.					
j	The registry requires registrars to inform registrants of the availability of alternative options to register domains.					
k	The contract(s) between registry and registrars commits registrars who choose to limit the registration of domains, to do so in line with human rights and clearly communicate it with					
Human rights	appropriate due process.					
Does the registry pr	comote international human rights standards in its interactions and contracts with registrars?	YES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
D.3 Providing D		nination	right to	material	gains from inventions and moral rights	of authors
D.3.1 Contracts be	etween registrar and registrant	illiacion,	rigite to	macenai	gams from inventions and moral rights	or dutilors
	clearly and openly informed about their contractual commitments to the registry of	or the regi	stry's tern			
Probability	Describe key impacts and who is impacted			Assess	numbers impacted	Severity of consequences for impacted
Indianton.		VEC	NO E	N/A	COMMENTS AND DOCUMENTATION	FOLLOW UP ACTION
Indicators a	The registry ensures that its terms of service is clearly and openly communicated in the contracts between registrars and registrants.	TES	NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
b	The registry ensures that registrars communicate clearly and openly about contractual commitments between registry and registrants in their contracts with registrants.					
	The contract between the registry and registrar includes povisions to ensure that the					
C	human rights commitments are conveyed to the registrant in a way that is easily accessible.					
Human rights compliance question Does the registry en	sure that registrars inform registrants about their contractual commitments to the		NO F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
D.3.2 Access to de	registry and about registry's terms of service?					
Human rights impact		acles.				
Probability	Describe key impacts and who is impacted			Accord	numbers impacted	Severity of consequences for impacted

licators		N/EG	No		N//0			V7.1710.V			. CTION
icators	The registry ensures that its own price setting of domains allows for equal access services.		NO	F/A	N/A	COMMEN	rs and docume	NIATION		FOLLOW-UP	ACTION
	The registry engages with registrars to ensure that their prices are at a level that	allows									
	for equal access to acquiring domains. The registry engages with registrars to ensure that their platforms and services are	e									
	accessible for people with disabilities. The registry strives to ensure that its domains are widely available, accessible and	1									
	affordable to all.										
	The registry ensures that no registrant is excluded from access to a domain by its registrars, unless such exclusion is based on national law of the country of the reg	istrar.									
man rights npliance qu											
npliance que	estion Does the registry ensure fair and equal access to acquiring domains?	YES	NO	F/A	N/A	COMMEN	rs and docume	NTATION		FOLLOW-UP	ACTION
3.3 Manag	ing personal data			\Box							
man rights i	mpact scenario										
rsonal data i bability	is collected, stored or used without a clearly defined purpose, in an unlawful or Describe key impacts and who is impacted	unsafe manne	r, or with			nd continued co bers impacted	onsent of registr	ants.	Severity	of consequence	ces for impac
											•
licators	A minimum of personal data is collected. Data is obtained by lawful and fair mean		NO	F/A	N/A		COMMENTS			FOLLOW-UP	ACTION
	based on free, unambiguous and informed user- consent. Users are allowed to wit their consent .	hdraw									
	Personal data is collected for a specific and clearly defined purpose. The registry h	ıas									
	mechanisms to ensure that data is accurate, complete and kept up-to-date. The registry has processes to ensure that personal data is deleted when it is no lo	nger									
	necessary to fulfil the purposes for which it was collected, except if the data is stri necessary for operational purposes.	ctly									
	The registry has measures to prevent that personal data is disclosed, made availa otherwise used for purposes other than those for which it is collected; except with										
	consent of the registrant or user, or by the authority of law.										
	When data is used to identify user patterns, it is used in an anonymized form.	a non									
	Employees have a duty of confidentiality by law and written agreements regardin- disclosure.	-									
	Personal data is protected by reasonable security safeguards against such risks as unauthorised access, fraud, destruction, use, modification or disclosure of data. A	iny									
	breach in security or in the confidentiality of personal data are remediated within hours, if at all possible.	24									
	Security audits are continuously conducted to ensure implementation of corrective	e actions									
	(e.g. in case of security incidents) and to maximize compliance with privacy and d protection policies and guidelines.										
	Registrants and users may obtain information about data relating to him/her; have data communicated within a reasonable time in an inexpensive and reasonable m	anner;									
	be able to challenge data relating to him/her and, if the challenge is successful, he data erased or rectified.	ave the									
	There is a general policy of openness about practices and policies with respect to	personal									
	data. Means are readily available of establishing the nature of personal data colle- main purposes of their use, and the identity of the data controller.	ted, the									
	Registry services that include privacy settings are by default set to maximize the	privacy									
	protection of the registrant and/or user. The registry provides clear information ar warnings to registrants and users, including minors, of the potential consequence:	ıd									
	changes they make in their default privacy settings.	5 01									
	The registry is aware of and complies with relevant national laws, international gu and industry standards regarding the transfer of personal data.	idelines,	No		N/.						. CELON
mpliance que	The registry is aware of and complies with relevant national laws, international guand industry standards regarding the transfer of personal data. astion jistry respect the privacy of registrants and other users, and take measures to privacy.	idelines,	NO	F/A	N/A		COMMENTS			FOLLOW-UP	ACTION
	The registry is aware of and complies with relevant national laws, international gu and industry standards regarding the transfer of personal data.	idelines,	NO	F/A	N/A		COMMENTS			FOLLOW-UP	ACTION
Does the reg	The registry is aware of and complies with relevant national laws, international guand industry standards regarding the transfer of personal data. astion jistry respect the privacy of registrants and other users, and take measures to privacy.	idelines,	NO	F/A	N/A		COMMENTS			FOLLOW-UP	ACTION
Does the reg	The registry is aware of and complies with relevant national laws, international guand industry standards regarding the transfer of personal data. estion listry respect the privacy of registrants and other users, and take measures to p their personal data? ty in services and operations mpact scenario	idelines,	NO	F/A	N/A		COMMENTS			FOLLOW-UP	ACTION
Does the reg	The registry is aware of and complies with relevant national laws, international guard industry standards regarding the transfer of personal data. sistion jistry respect the privacy of registrants and other users, and take measures to privacy their personal data? ty in services and operations	idelines,	NO			bers impacted	COMMENTS		Severity	of consequence	
3.4 Securit man rights invices provide	The registry is aware of and complies with relevant national laws, international guard industry standards regarding the transfer of personal data. sistion listry respect the privacy of registrants and other users, and take measures to pythem the privacy of the process of th	idelines,	NO			bers impacted	COMMENTS		Severity		
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F.1 Assessing I	mpacts						
ndicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	The registry has a policy commitment to periodically and continually assess the potential adverse impacts on the international human rights (for example, through HRIAs).						
	Product impact assessments are carried out during the development of and prior to implementing new products or services, to identify and mitigate potential adverse impact these may have on human rights.						
	Such assessments includes engagement with stakeholder groups, independent expert resources, human rights groups, and other with specific knowledge on national laws and regulation, to the widest extent possible.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
D	oes the registry identify and assess adverse human rights risks prior to launching new products, services, and/or policies?						
.2 Responding	to Impacts						
ndicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
<u> </u>	The registry has adopted strategies to anticipate, respond to, and minimize potential adverse impacts on human rights.						
)	The registry has clear and unambiguous terms of service. ToS include commitment to uphold international human rights standards and avoid interfering with the free flow of information.						
	The registry has a function with responsibility for overseeing compliance with its principles on human rights.						
I	Sufficient organisational resources are in place to ensure implementation of the registry's commitment to human rights.						
2	Employees receive training on the registry's principles on human rights.						
	Employees have effective means to safely report noncompliance with the registry's principles on human rights.						
luman rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the	registry have systems and organizational capacity in place to address potential adverse impacts on international human rights?						
F.3 Governmen	t Requests						
ndicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
à	Government requests that interfere with the right to privacy or the right to freedom of expression are subject to operational processes that assess the request for human rights compliance.				į	Assess for legality	
)	In complex cases, the assessment includes engagement with independent experts, human rights groups, and others with specific knowledge on national laws and regulation.						
:	Governments are requested to provide details regarding the necessity and justification for any restrictive request in written form.						
i	When government requests appear to be in conflict with human rights standards on freedom of expression or the right to privacy, the registry has processes to seek judicial review, appeal to relevant branches of the administration, and/or engage with relevant UN bodies or other stakeholders (including from civil society) for advice and support.						
2	Any measure that interferes with the right to freedom of expression is taken on the basis of a specific decision by a state authority expressly empowered by law to do so.						
	Government requests that appear inconsistent with human rights law are addressed by senior level management to decide on the risks of responding vis-a-vis rejecting the request. National and international resources, including industry peers, are engaged to the						

Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	e registry have procedures in place to handle government requests revent interferance with the rights to privacy and freedom of expression?						
F.4 Third-party	Requests						
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	Third-party requests that interfere with the right to privacy or the right to freedom of expression are subject to operational processes that assess the request for human rights compliance.						
b	In complex cases, the assessment includes engagement with independent experts, human rights groups, and others with specific knowledge on national laws and regulation.						
с	Third-party are requested to provide details regarding the necessity and justification for any restrictive request in written form.						
d	When third-party requests appear to be in conflict with human rights standards on freedom of expression or the right to privacy, the registry has processes to seek judicial review, appeal to relevant branches of the administration, and/or engage with relevant UN bodies or other stakeholders (including from civil society) for advice and support.						
e	Any measure that interferes with the right to freedom of expression is taken on the basis of a specific decision by a state authority expressly empowered by law to do so.						
f	Third-party requests that appear inconsistent with human rights law are addressed by senior level management to decide on the risks of responding vis-a-vis rejecting the request.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
	ne registry have procedures in place to handle third-party requests revent interferance with the rights to privacy and freedom of expression?						
F.5 Tracking Co	mpliance						
Indicators a	Periodic audits are conducted to assess compliance with the registry's principles on human rights. These audits include feedback from registrants and other potentially affected stakeholders.	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
b	Suppliers and business partners are made aware of the registry's policies related to human rights, and of the human rights principles they are required to adhere to as part of their contracts with the registry.						
Human rights compliance question		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Does the registry	have systems in place to track compliance with its principles on human rights?						
F.6 Transparen Right to freedom	cy, Communication, and Reporting of information						
Human rights impact Registrants and doma	scenario iin users are unable to access information on the human rights related commitmen	ts, poli	cies, pro	ocedure	es, and p	performance of the registry.	
Probability (choose)	Describe key impacts and who is impacted (write text)					numbers impacted o choose option)	Severity of consequences for impacted people (click to choose option)
Indicators		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
a	The registry's policies on human rights are explained to registrars, registrants, users, governments, and third-parties in clear language and an accessible form.						
b	Requests that interfere with individuals' right to privacy are documented and communicated to customers and other relevant stakeholders to the fullest extent possible, e.g. through a transparency report.						

c	Requests that interfere with individuals' freedom of expression are documented and communicated to customers and other relevant stakeholders to the fullest extent possible, e.g. through a transparency report.
d	Subject to legal restrictions, the registry publicly reports data by country on the number and character of requests received, e.g. to monitor or access registrants' or users' data or restrict domain services, and how it has responded to these requests.
е	The registry provides clear instructions to third parties about lawful requirements for access to user data, content removals, and any other processes that have potential human rights implications.
f	Subject to legal restrictions, affected registrants and users are informed requests, as well as the action taken.
g	The registry publishes information and procedural guidelines on any fast-track content removal arrangements it may have with third parties (e.g. "trusted notifiers").
h	In case a registrant or user tries to access specific content which has been blocked, they are provided with an explanation of why the content is blocked including contact details.

Human right compliance o		YES	NO	F/A	N/A	COMMENTS AND DOCUMENTATION	FOLLOW-UP ACTION
	Does the registry allow all interested stakeholders to access information on commitments, policies, procedures, and performance on human rights?						
F.7 Acces Indicators	ss to Remedy	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
à	Registrants and users are provided with effective, safe, confidential and transparent mechanisms for voicing and resolving concerns relating to human rights issues.						
)	Subject to legal restrictions, registrants and users who have been subject to interference with their rights are provided with advice on how and where they may respond.						
	The registry provides for, collaborates in, or otherwise ensures the swift, fair and comprehensive investigation and remediation of registrant or user complaints.						
t	The registry provides independent mediation or complaint body in the case that a registrant does not agree with a decision made by said registry.						

compliance question	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
Do registrars, registrants and users whose rights may be affected by the registry's systems, products or services have access to safe, effective, and fair remedies through which potential impacts can be reported, investigated and remediated?						

Probability

Does not occur

Isolated incidents may occur

Occurs systematically

Scale of impact 0 - 500 persons

500 - 5.000 persons

5.000 persons and above

Severity

Low

Medium

High