



SAMPLE ENGAGEMENT QUESTIONS

Navigating Portfolio Exposure to Conflict-Affected and High-Risk Areas

PRACTICAL GUIDANCE FOR INVESTOR
ENGAGEMENT WITH COMPANIES

APRIL 2025



SAMPLE ENGAGEMENT QUESTIONS

POLICY

- Does the company have in place a clear public commitment to undertake systematic and regular heightened human rights due diligence (hHRDD) in conflict-affected and high-risk areas (CAHRA) across its own operations and value chain relationships?
- Has the company identified CAHRA as a salient issue/risk in its public commitment?
- Is it clear that this public commitment has been signed off at the highest levels of management?
- Does the company broadly outline the steps of its hHRDD process in its public commitment?
- Does the company publicly disclose specific CAHRA risks identified as part of the hHRDD process, including which stakeholders are impacted?
- Can the company articulate how the hHRDD process is distinct from its routine HRDD process?
- How does the company incorporate a conflict analysis when conducting hHRDD?
- How does the company incorporate its obligations under international humanitarian law and criminal law when applicable?
- How does the company ensure human rights and conflict-related expertise is incorporated into each stage of the hHRDD process? Does it enlist third party experts?
- Can the company share an example of how hHRDD is conducted on an ongoing basis in relation to a specific CAHRA?
- Can the company share a recent example of when it successfully identified and managed CAHRA risks? What challenges, opportunities, and/or other learnings emerged from the process?

PRACTICES

- How does the company identify its exposure to CAHRA? What resources does the company use to define CAHRA?
- How does the company assess CAHRA-related risks? Does the company have a specific methodology in place for identifying, assessing, and addressing these risks? If so, what does it entail?
- Can the company articulate to investors the various steps of its hHRDD process?
- What is the company's approach to stakeholder engagement in relation to CAHRA? How does it determine which stakeholders to engage with and the frequency of engagement? How does it engage with impacted stakeholders (or credible proxies) in or with proximity to CAHRAs? How does it ensure that engagements do not pose a risk to stakeholders?
- Can the company share some of the different types of mitigation measures it employs to

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- prevent and mitigate CAHRA risks that are identified as part of the hHRDD process? How does it monitor that those measures are having the intended outcomes, particularly upon impacted stakeholders? How does the evaluation of those measures feed into the continual improvement of the CAHRA risk management process?
- What type of know-your-customer (KYC) due diligence does the company undertake as part of the hHRDD process, particularly for sales involving high-risk customers, geographies, or products?
 - If a company or its subcontractors are utilizing private security services, how does the company conduct due diligence of those security providers?
 - Can the company share a recent example of CAHRA risks that was addressed by senior management or the Board?
 - What crisis response processes and mechanisms are in place to manage CAHRA risks? Can the company share a description or depiction of who holds what roles, responsibilities and authorities for CAHRA risk management? Who is responsible for ultimate oversight of these processes?
 - Does the company publicly set out the organizational roles and responsibilities for implementation, monitoring, oversight, and accountability for hHRDD?
 - How does the company ensure that personnel involved in hHRDD are equipped with the appropriate competencies and training?
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GOVERNANCE

- What resources (staff, time, budget) does the company allocate to managing CAHRA risks? Does the company have staff at HQ and in the field specifically dedicated to managing these risks? Are there dedicated teams or are these responsibilities integrated into broader enterprise risk management functions?
- Are there Board-level committees with responsibility for overseeing CAHRA risk management efforts? With what frequency are CAHRA risks discussed at senior management and/or Board levels? Does the company possess Board level expertise on the prevention and mitigation of CAHRA risks?
- Can the company provide an overview of the established pathways in place to escalate CAHRA risks to senior leadership and/or the Board?