



INVESTOR ALLIANCE
FOR HUMAN RIGHTS
AN INITIATIVE OF ICCR

CR2R WEBINAR 5: The Corporate Responsibility to Respect (CR2R) – Effective Operational-level Grievance Mechanisms

December 16, 2025
9am ET/2pm UK/3pm CET

Agenda:

- Welcome & Introduction to the CR2R webinar series
- Company Good Practices on Effective OLGM
- Benchmarking Companies' Grievance Processes
- Corporate Case Study: Grievance and Remediation Processes in Practice
- Investor Engagement with Companies on OLGM and Remedy
- Q&A
- Closing

Panelists:



Jon Drimmer
Partner,
Steptoe LLP
and
Senior Advisor,
Global Business Initiative



Namit Agarwal
Social Transformation
Lead,
World Benchmarking
Alliance



Michael Courtenay
Investigations Manager –
Legal,
Ethics & Compliance,
Lenovo



Mary Beth Gallagher
Director of Engagement,
Domini Impact
Investments



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The CR2R webinar series

CR2R Webinar Series

- **Purpose:** Systematically explore the elements of the corporate responsibility to respect human rights (CR2R) as framed in the UN Guiding Principles on Business and Human Rights to educate and support investors as they assess and engage with their portfolio companies on their human rights performance.
- During five webinars, elements of the CR2R will be examined in greater depth:
 1. **Human Rights Policy and Governance**
 2. **HRDD Part 1: Context and Sector Specific Approaches to Human Rights Impact Assessment**
 3. **HRDD Part 2: Integrating, Tracking, and Monitoring Human Rights Risk Management**
 4. **HRDD Part 3: Communication of Responsible Business Conduct to Stakeholders**
 5. **Effective Operational-level Grievance Mechanisms**

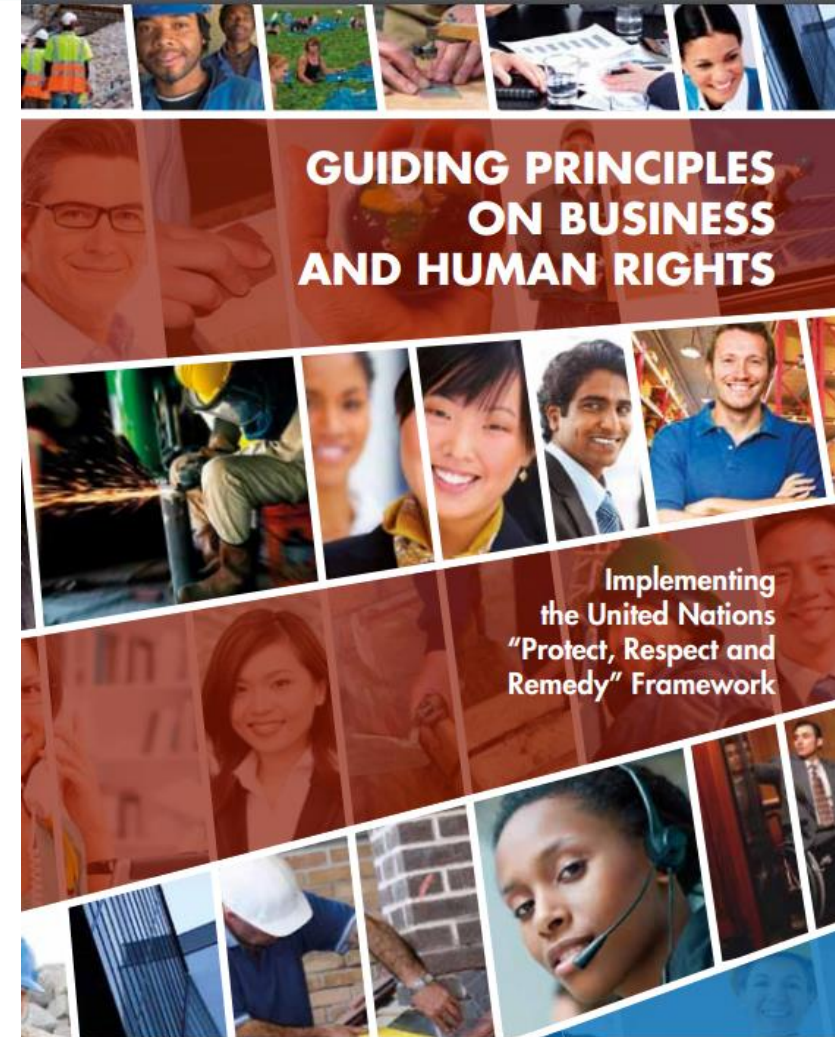
Visit our [CR2R webpage](#) to see all the webinars, videologs, and resources.

What is CR2R?



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- UNGP 15 lays out CR2R - Businesses should have in place policies and processes including:
 1. A **policy commitment** to respect human rights ([Webinar 1](#))
 2. A **human rights due diligence** process to identify, cease, prevent, mitigate and account for how they address their impacts on human rights, including
 - ✓ Process for assessing actual and potential human rights impacts ([Webinar 2](#))
 - ✓ Process for integrating and acting upon assessment and tracking responses ([Webinar 3](#))
 - ✓ Process to communicate findings ([Webinar 4](#))
 3. **Processes to remediate** adverse human rights impacts businesses cause or to which they contribute – (*TODAY*)



The human rights due diligence process: Spotlight – Remediation

- **UNGP 22:**

- “Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes.”
- Links the CR2R human rights under Pillar II with access to remedy under Pillar III, creating a direct bridge between responsibility and remediation.

- **UNGP 29:**

- "To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted."
- Allows those impacted to raise concerns and where harms have occurred to receive remedy
- Enables companies to identify systemic problems and address harms before they compound and grievances escalate (early warning system)
- Transparent reporting on grievance mechanisms and actions taken support investor due diligence, informs investment decision-making, and reinforces accountability for human rights commitments

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



(Source: OECD Due Diligence Guidance)

UNGP 31: Effectiveness Criteria

- OLGM should be user-centric to support stakeholder engagement, inform due diligence, and drive continuous learning and improvement.
- The UNGPs outline criteria to gauge the effectiveness of a company's OLGM.

Table 1: UNGPs effectiveness criteria for non-judicial GMs⁴

Legitimate	Enable trust from stakeholders and be accountable for the fair conduct of grievance processes
Accessible	Put in place adequate provisions to ensure that the existence of the GM is known and accessible to all target stakeholders, including providing adequate assistance to those who may face barriers to access (e.g. having all relevant language options or having a way to lodge grievances orally for those who cannot write)
Predictable	Provide a clear and known procedure to ensure consistency in the GM process, and clarity on the types of processes and outcomes available. This can be done with a decision flow diagram with indicative time frames
Equitable	Ensure that the aggrieved parties have reasonable access to information, advice, and expertise to engage in the grievance process on fair, informed, and respectful terms (e.g. making sure the process is culturally appropriate and free from cost or other potential barriers)
Transparent	Keep the aggrieved parties informed about the progress of the grievance and provide sufficient information about the GM's performance (e.g. through statistics or case studies)
Rights-compatible	Ensure that the outcomes and remedies are aligned with the internationally recognised standards for human rights. GMs should have a rights-compatible process, meaning that the processes of the GM should be based on the human rights principles of inclusion, participation, transparency, attention to vulnerable people, and non-retaliation. A rights-based GM will also ensure that remedies should be adequate, effective, prompt, culturally appropriate, and gender-sensitive, and that the GM should not impede access to judicial or administrative remedies
Source of continuous learning	Allow the business to identify opportunities for improvement and prevent future or recurring harm (e.g. grievance trends identified and used to make changes and improvements)
Based on engagement and dialogue	Consult stakeholder groups on the GM's design and performance and use dialogue to address and resolve grievances



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Jon Drimmer



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Namit Agarwal



Benchmarking Companies' Grievance Mechanisms

What WBA Benchmarks Measure

The 2,000 companies shaping our future

Are headquartered in
83 countries

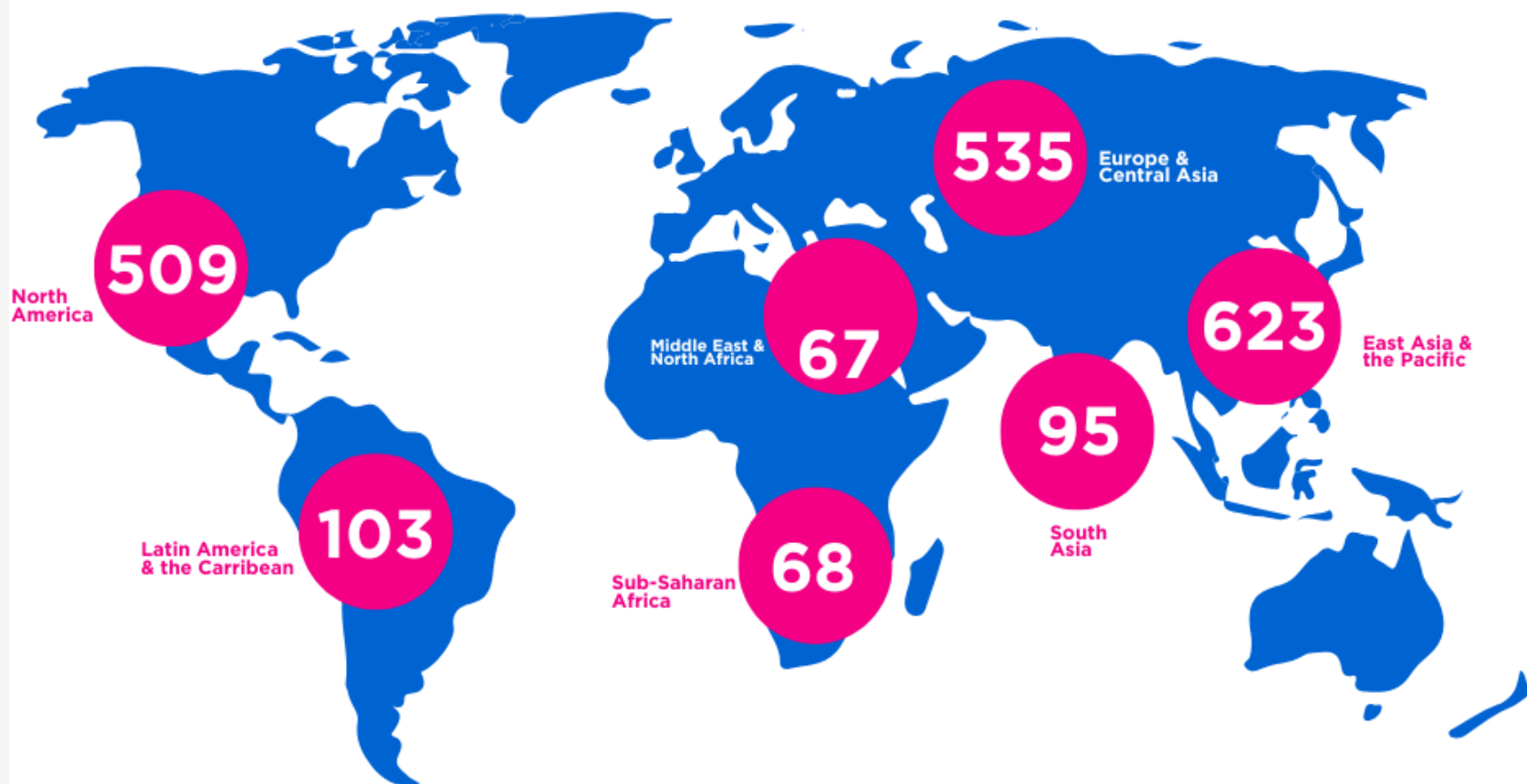
Earn the equivalent of
46%
of global GDP

Operate in nearly
every country
on the planet

Are responsible for
54%
of global energy-related emissions

Employ
99 million
people directly

Plus
**hundreds of
millions**
more in their supply chains



Insights as a beacon for progress

- The **future is precarious** and the need for action is inescapable
- Yet there is no pathway to a stable, sustainable future **without business transformation**
- We **assess and benchmark the world's 2,000 leading companies** on their impact on people and planet
- These assessments are freely and publicly available to help companies, investors and regulators **drive corporate accountability**
- To achieve our mission, **we work closely with our Alliance**, a collaborative and aligned community of around 400 global organisations



Tiered approach to assessing grievance mechanisms

WBA enables both **portfolio-wide screening** and **deep due diligence** on grievance and remedy.

Social Benchmark

- Covers 2,000 companies globally
- Assesses baseline expectations on access to grievance mechanisms

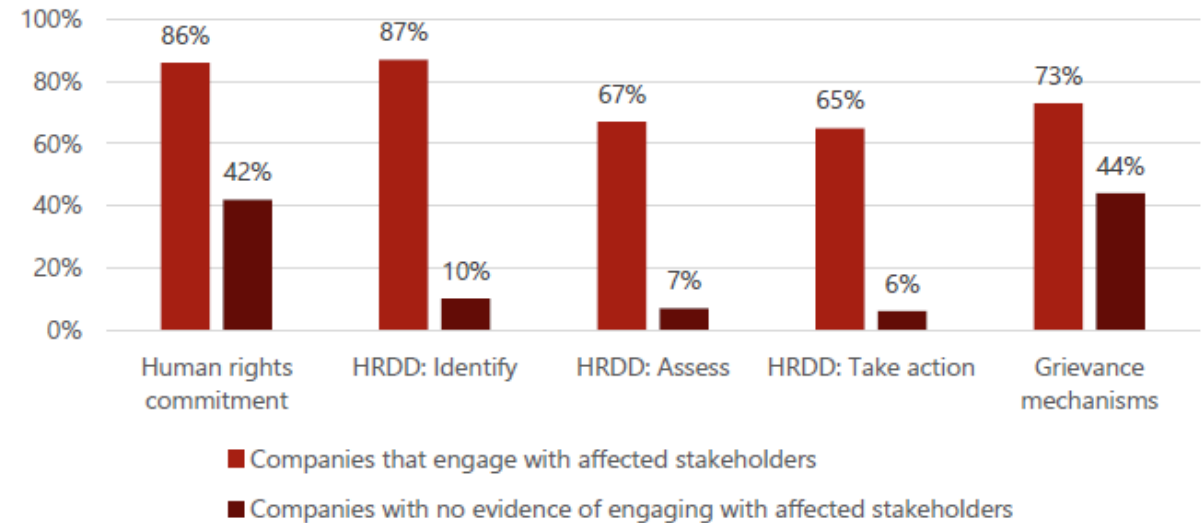
Corporate Human Rights Benchmark (CHRB)

- Covers ~100 companies in high-risk sectors
- Assesses quality, effectiveness, and remedy outcomes



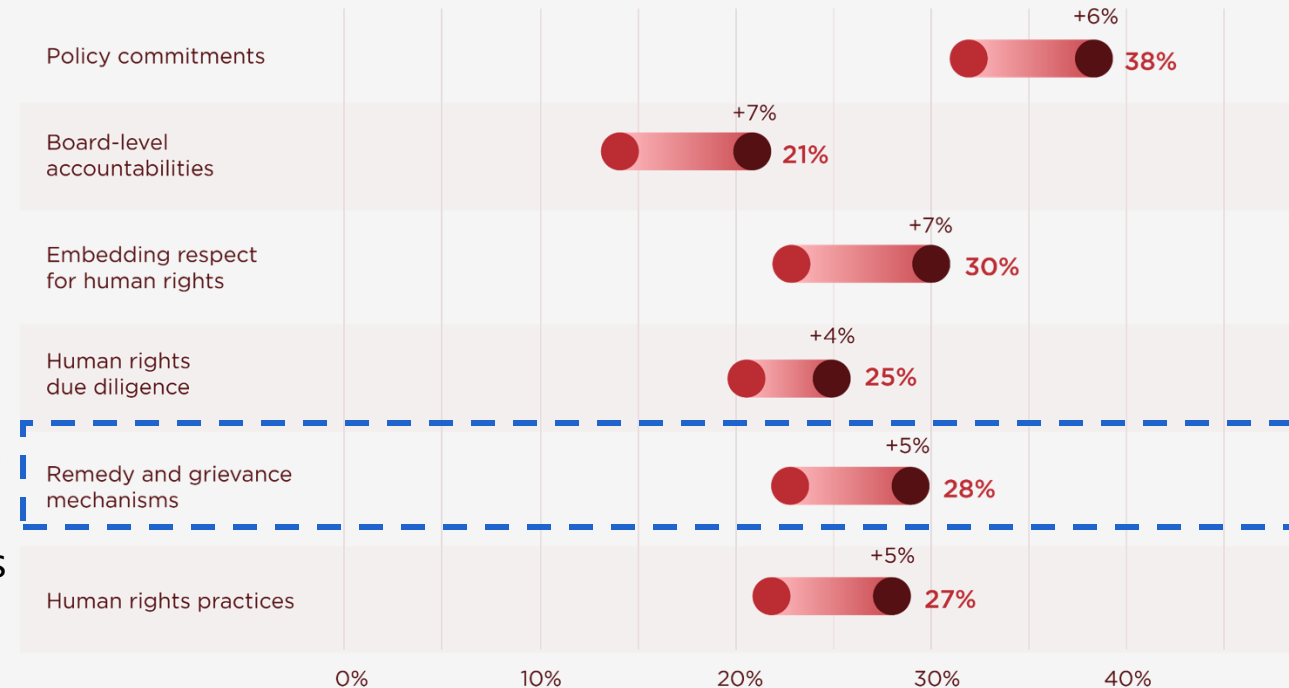
Stakeholder Engagement Drives Access to Grievance Mechanisms

- Just 9% of companies in the Social Benchmark disclose examples of engagement with stakeholders.
- Companies that do engage and disclose this engagement significantly outperform their peers on grievance mechanisms.
- While 58% companies have a grievance mechanism available to workers or external individuals:
 - 73% of companies that engage affected stakeholders have a grievance mechanism
 - Only 44% of companies with no evidence of engagement have one



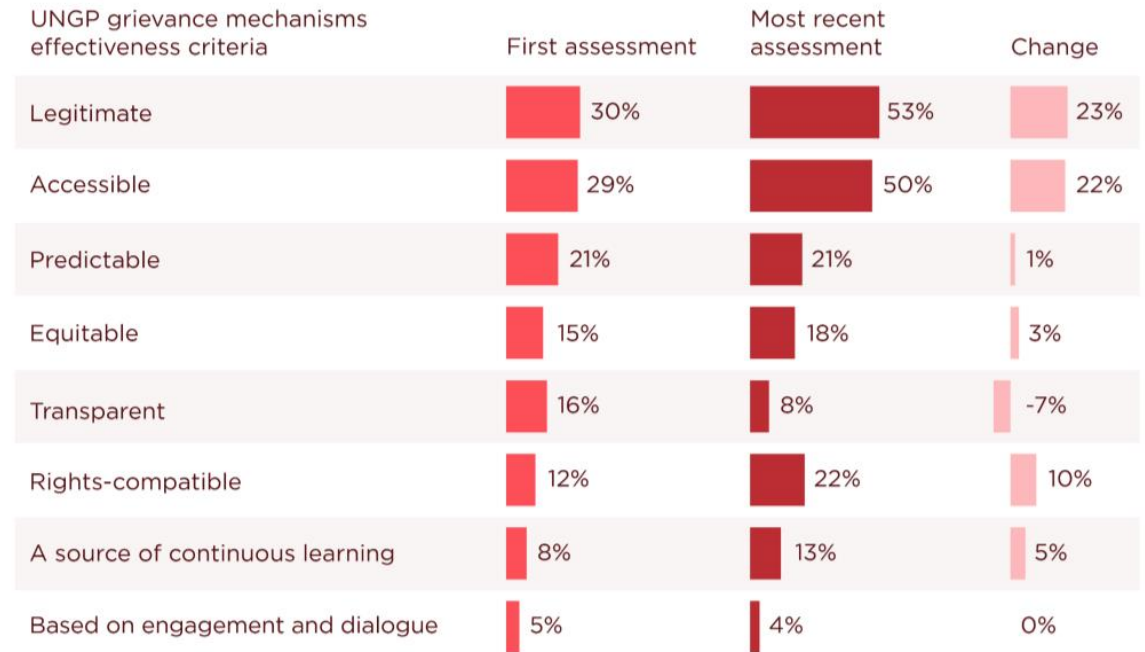
Grievance mechanisms: access is improving

- **Commitments to remedy have nearly doubled**
 - Companies committing to provide remedy increased from 16% to 30% over five iterations.
- **Broader stakeholder coverage**
 - Access for supply chain workers rose from 48% to 68% (+20%).
 - Mechanisms for external individuals and communities increased from 41% to 66% (+25%).
- **Improved safeguards and trust signals**
 - Companies prohibiting retaliation increased by 20%, to nearly 60%.
 - Availability of grievance mechanisms in local languages rose by 13%, to 48%.
- **Greater rights compatibility**
 - Companies describing how they provide remedy, or have done so, nearly doubled to 27%.



Effectiveness still lags behind availability

- **Weak transparency and predictability**
 - Only 14% of companies disclose details such as grievance response timelines, a 6% decline over time.
- **Limited stakeholder engagement**
 - Just 6% of companies explain how users were involved in designing or reviewing grievance mechanisms, down from 8%.
- **Equity challenges remain**
 - Community access to grievance mechanisms through suppliers has barely improved, from 21% to 22%.
- **Uneven alignment with UNGP effectiveness criteria**
 - Improvements seen in legitimacy, accessibility, and rights-compatibility.
 - Persistent gaps in transparency, equitability, predictability, and learning.



What the Social Benchmark measures?



Grievance mechanism(s) for workers

- Company has one or more grievance mechanisms
- Accessible to all workers
- Can be used without fear of reprisals

Grievance mechanism(s) for external individuals and communities

- Mechanism available to affected individuals and communities
- Includes those acting on their behalf
- Explicit protection from retaliation

The Social Benchmark sets a floor for grievance and remedy expectations.

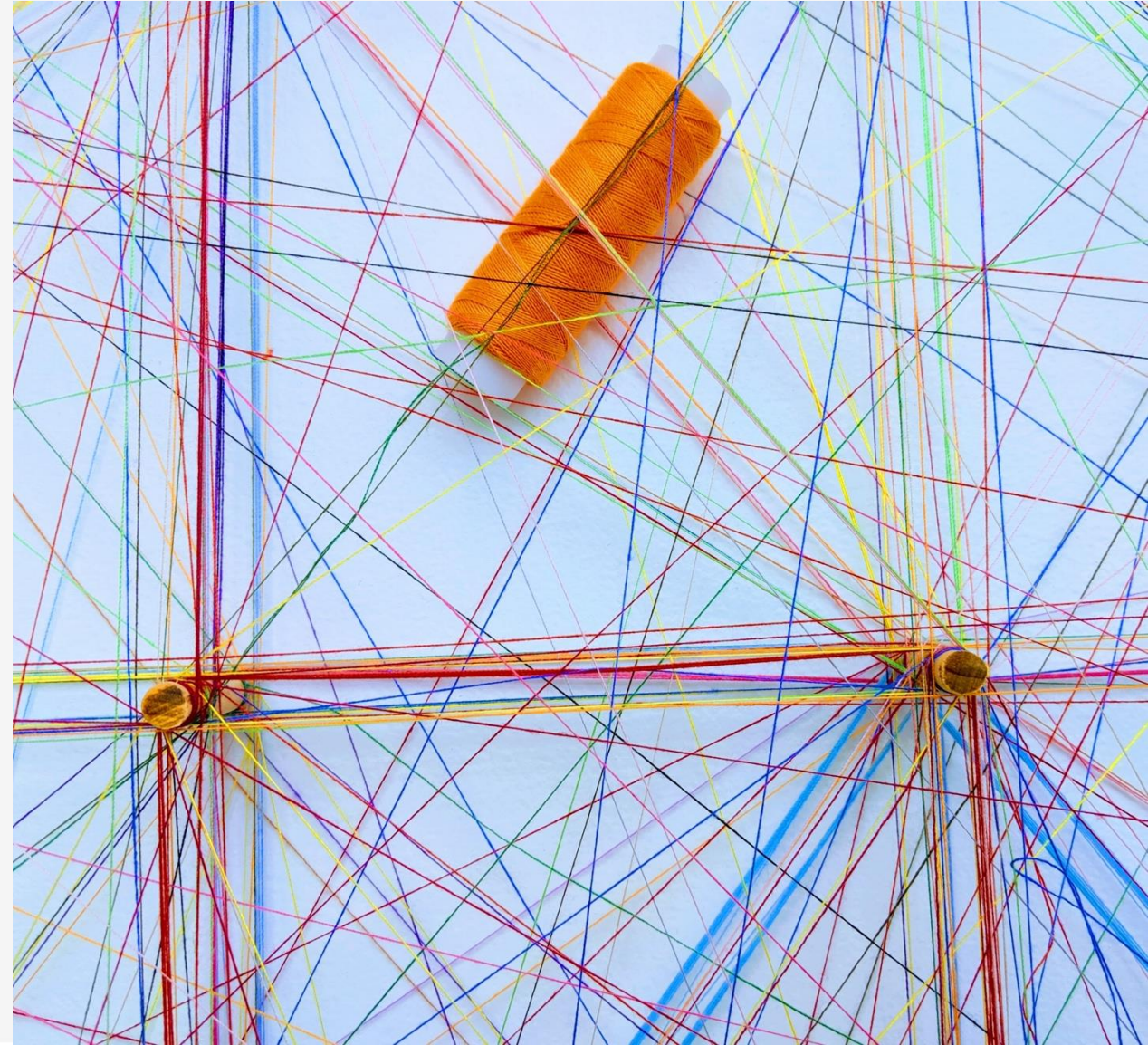
What investors get at scale

- ✓ Clear signal on whether companies meet minimum UNGP expectations
- ✓ Comparable data across 2,000 companies
- ✓ Portfolio-level visibility on access to grievance channels

What CHRB measures?

Measurement Area E: Remedies and Grievance Mechanisms

- Grievance mechanisms for workers (E01)
- Grievance mechanisms for external individuals and communities (E02)
- Fair and transparent grievance procedures (E04)
- Remedying adverse human rights impacts (E07)



E01: Grievance mechanisms for workers

Whether the company:

- Has one or more grievance mechanisms, or participates in a shared mechanism, accessible to all workers

Ensures the mechanism is:

- Available in appropriate languages
- Actively communicated to workers through training or other means

What this tells investors

- ✓ Whether workers can raise concerns safely and practically
- ✓ Whether grievance mechanisms are embedded into everyday operations, not just policy documents

E02: Grievance mechanisms for external individuals and communities

Whether the company:

- Has a grievance mechanism, or participates in a shared mechanism, accessible to external individuals and communities who may be adversely impacted

Ensures:

- Availability in local languages
- Awareness among affected communities at operational sites

What this tells investors

- ✓ Whether companies recognise impacts beyond their workforce
- ✓ Whether communities have real channels to raise concerns before conflicts escalate

E04: Are grievance procedures fair, transparent, and usable?

Companies must explain, in public disclosures:

- How grievances are handled, including:
 - Clear timelines for addressing complaints
 - How complainants are kept informed
- Support available to complainants
 - Technical, financial, or advisory support to ensure equitable access
- Expected outcomes
 - What types of remedy or resolution complainants can realistically expect
- Escalation pathways
 - Options to escalate concerns internally or to independent third parties

What this tells investors

- ✓ Whether grievance mechanisms are credible and trusted
- ✓ Whether processes align with UNGP effectiveness criteria, not just formal availability

E07: Remediating adverse human rights impacts

Whether the company:

- Describes how it provides or enables timely remedy when it has caused or contributed to harm
- Explains what it would do even if no impacts have yet been identified

Discloses:

- Changes to systems or practices to prevent recurrence
- How implementation of remedy is monitored

What this tells investors

- ✓ Whether companies move beyond handling complaints to fixing root causes
- ✓ Whether grievance data feeds back into risk management and due diligence

Leading Practices



Grievance mechanisms accessible to own workers, supply chain workers, individuals and communities

Transparent disclosure of:

- Procedures and response timelines

Strong focus on rights-compatible remedy

- Clear explanation of how remedy is provided
- Disclosure of system and process changes to prevent recurrence
- Monitoring of remedy implementation

SAMSUNG

- Consistently strong performance on accessibility across CHRB iterations
- Improved predictability and rights-compatibility
 - Clearer information on remedies provided
 - Explicit non-retaliation expectations for suppliers
- Emerging good practice on stakeholder engagement
 - Engaging users to improve grievance mechanisms
 - Using feedback as part of ongoing dialogue and learning



Thank you!

n.agarwal@worldbenchmarkingalliance.org



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Michael Courtenay

Smarter technology for all

Grievance and Remediation Processes in Practice

Mike Courtenay
December 16, 2025

Lenovo

Agenda

- Introduction
- Lenovo's Investigations Process
- Whistleblowing, Case Management System and Tools
- Speak Up Program
- Questions



Introduction



Shama Patari

VP & Deputy General Counsel, Ethics & Compliance, Gov't Relations & Trade



Tanya Roychowdhury

Director, Legal Counsel - Global Ethics and Compliance



Mike Courtenay

Investigations Manager - Legal, Ethics & Compliance

Lenovo's Investigations Process



Lenovo Investigation Oversight Committee (IOC)

Members:



Responsibilities:

- Provides global oversight of all Lenovo internal investigations including potential Code of Conduct violations
- Sets and administers the global Investigations Policy and framework
- Management of a reports through a centralized case management system and intake platform
- Conducts meetings on a monthly basis to review investigation trends, notable case outcomes, and identify focus areas for training and awareness
- Periodically reports to the Lenovo Executive Ethics Committee and the Audit Committee of Lenovo's Board of Directors

Lenovo Report Intake Methods



All cases for investigation are input into the case management system

- Allegations arise from various channels, inside and outside the company
- Potential issues are funneled to the IOC for allocation to lead investigation function based on the IOC Roles and Responsibilities matrix
- Lead investigation function commences investigation and provides periodic updates to the IOC
- All information is documented in our investigations case management system – LenovoLine intake automatically creates a case in the system, other intake methods a case is manually added to the system

*Other sources includes additional intake methods such as referrals from management, other interested parties, and escalations from other IOC functions.

IOC Roles and Responsibilities matrix overview

ER

- Alcohol & Substance Abuse
- Family Members & Personal Relationships
- Employment Credential Falsification
- Discrimination
- Harassment
- Sexual Harassment
- Inappropriate Conduct
- Retaliation
- Workplace Violence/Threats
- Misuse of Company Assets

Legal

- Artificial Intelligence
- Bribery & Corruption
- Conflicts of Interest
- Board Memberships
- Discrimination
- False/Deceptive Comments
- Falsification or Forgery of Records
- Harassment
- Health, Safety & Environment
- Human Rights
- Import/Export
- Intellectual Property Rights
- Privacy & Data Protection
- Confidential/Restricted Information
- Insider Information & Securities Trading
- Misuse of Company Assets
- Retaliation
- Workplace Violence / Threats

Internal Audit

- Embezzlement / Fraud
- Bribery & Corruption & Larceny
- Outside Relationships
- Personal Investments
- Delegation of Authority
- Bid Rigging / Price Fixing / Customer Boycott
- Falsification / Forgery
- Import/Export
- Insider Information & Securities Trading
- Misuse of Company Assets

Physical Security

- Alcohol & Substance Abuse
- Larceny
- Health, Safety & Environment
- Misuse of Company Assets
- Workplace Violence/Threats

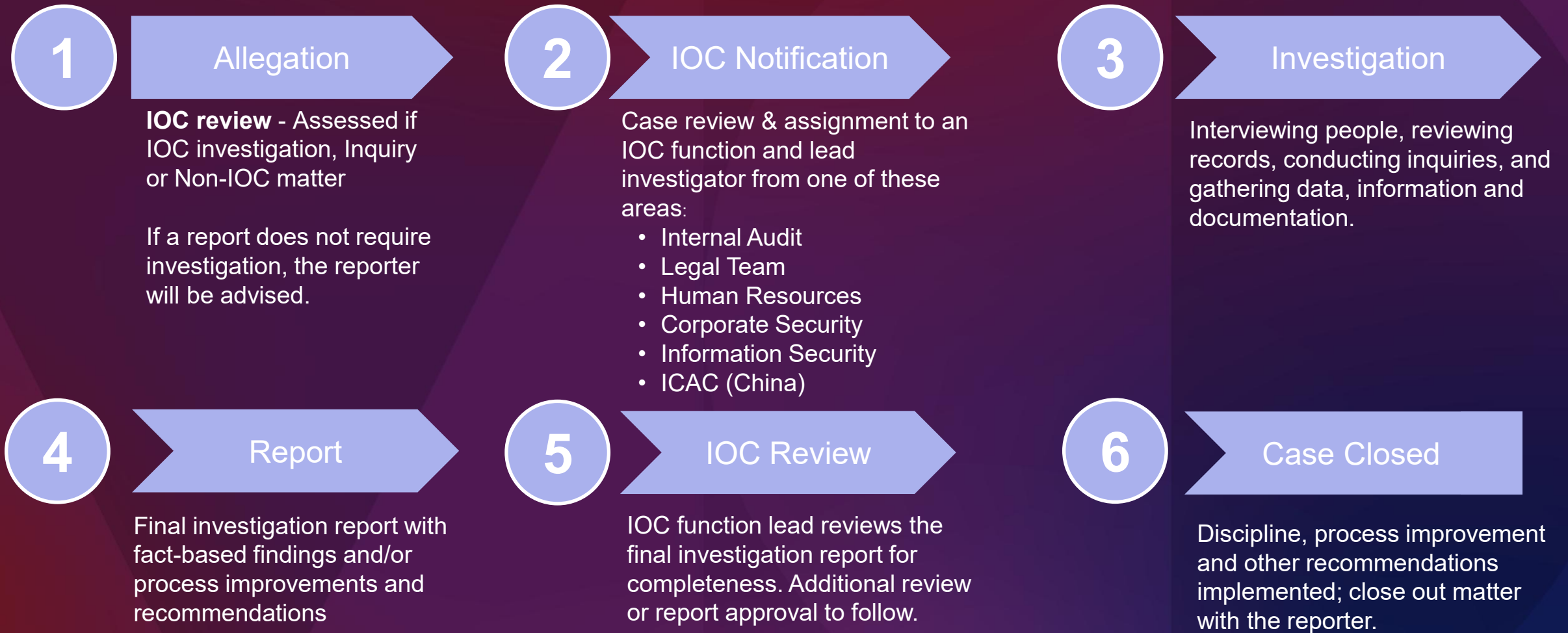
Information Security

- Confidential & Restricted Information
- Misuse of Company Assets

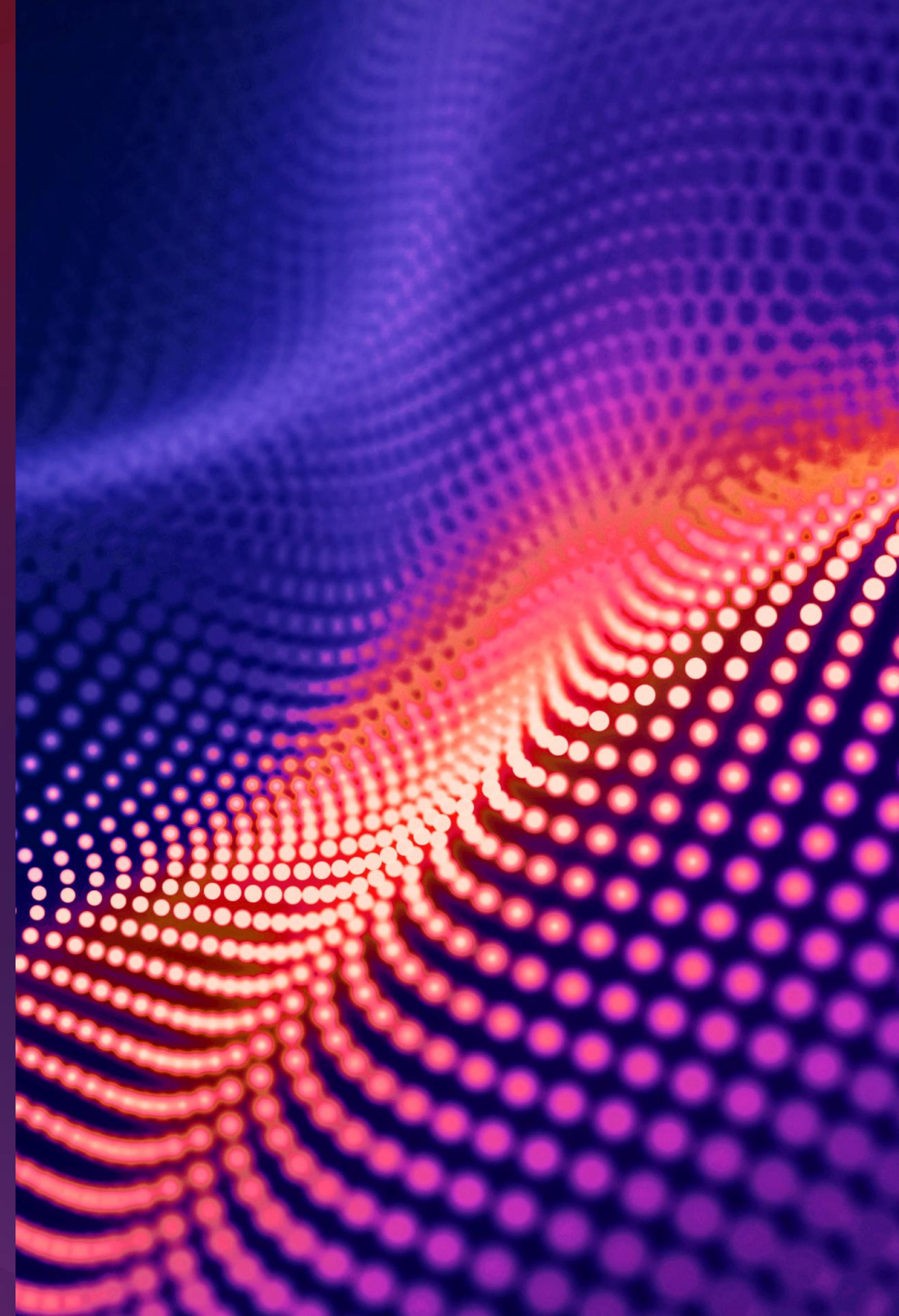
ICAC (China only)

- Embezzlement / Fraud
- Larceny
- Bribery & Corruption
- Outside Relationships
- Personal Investments
- Bid Rigging/Price Fixing/Customer Boycott
- Falsification/ Forgery
- Insider Information & Securities Trading

Investigation Flowchart

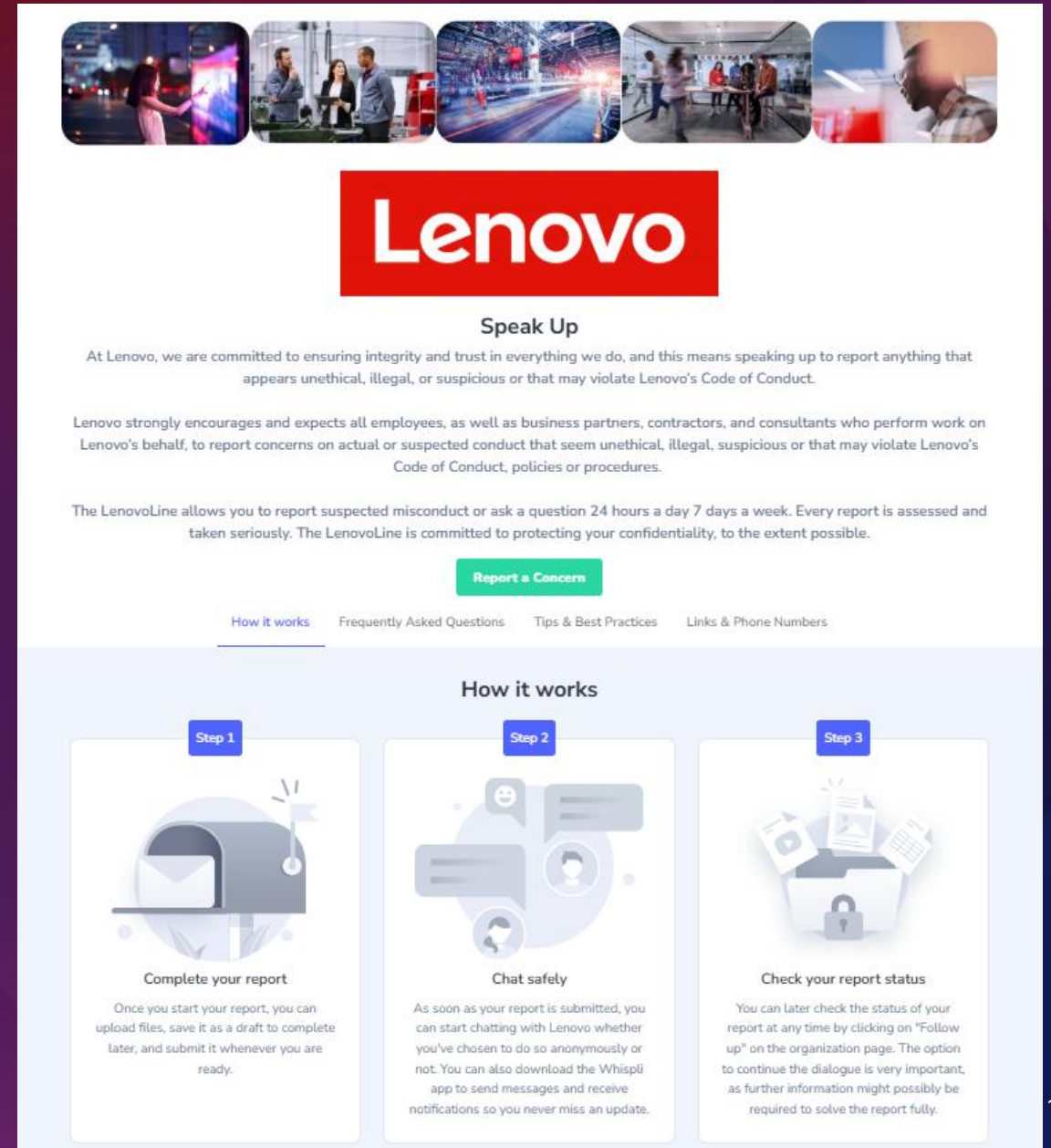


Whistleblowing, Case Management System and Tools



Internal Investigations Case Management & Hotline

- LenovoLine, our whistleblowing reporting and case management system is provided by Whispli and managed internally
- Available in all languages supporting our employees (42)
- Available via desktop, phone, and mobile app
- Reporters can remain completely anonymous
- Communication within case (in reporters' language and can remain anonymous)
- Analytical dashboards to identify trends and insights
- Fully customizable system and Automations
- Data Hosting in China and the EU
- Redaction capabilities



The screenshot displays the Lenovo internal investigations portal. At the top, a row of five small images shows various workplace scenarios. Below this is the large red Lenovo logo. The main heading is "Speak Up". The text states: "At Lenovo, we are committed to ensuring integrity and trust in everything we do, and this means speaking up to report anything that appears unethical, illegal, or suspicious or that may violate Lenovo's Code of Conduct." It further encourages all employees, business partners, contractors, and consultants to report concerns. A green button labeled "Report a Concern" is prominent. Below the button are links for "How it works", "Frequently Asked Questions", "Tips & Best Practices", and "Links & Phone Numbers". The "How it works" section is detailed in three steps: 1. "Complete your report" (upload files, save as draft, submit), 2. "Chat safely" (start chat with Lenovo, use Whispli app for notifications), and 3. "Check your report status" (check status anytime, click "Follow up" on organization page).

Lenovo

Speak Up

At Lenovo, we are committed to ensuring integrity and trust in everything we do, and this means speaking up to report anything that appears unethical, illegal, or suspicious or that may violate Lenovo's Code of Conduct.

Lenovo strongly encourages and expects all employees, as well as business partners, contractors, and consultants who perform work on Lenovo's behalf, to report concerns on actual or suspected conduct that seem unethical, illegal, suspicious or that may violate Lenovo's Code of Conduct, policies or procedures.


The LenovoLine allows you to report suspected misconduct or ask a question 24 hours a day 7 days a week. Every report is assessed and taken seriously. The LenovoLine is committed to protecting your confidentiality, to the extent possible.

[Report a Concern](#)

[How it works](#) [Frequently Asked Questions](#) [Tips & Best Practices](#) [Links & Phone Numbers](#)

How it works


Step 1



Complete your report

Once you start your report, you can upload files, save it as a draft to complete later, and submit it whenever you are ready.


Step 2



Chat safely

As soon as your report is submitted, you can start chatting with Lenovo whether you've chosen to do so anonymously or not. You can also download the Whispli app to send messages and receive notifications so you never miss an update.

Step 3



Check your report status

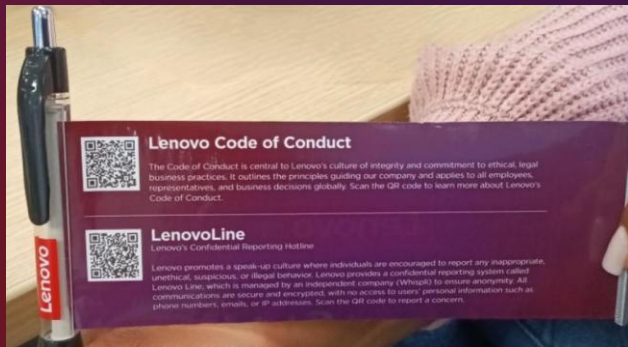
You can later check the status of your report at any time by clicking on "Follow up" on the organization page. The option to continue the dialogue is very important, as further information might possibly be required to solve the report fully.

Speak Up Program



Speak Up Program

- Posters in all locations (office and manufacturing) in multiple languages
- Badge and pen inserts
- Quarterly communications with to all employees with high level anonymized case summaries
- Localized communications for our LenovoLine
- On-site visits
- Targeted communications on trending issues from executive leadership
- Screen lock with QR code to LenovoLine
- Data capture on awareness
- Training
 - Code of Conduct training
 - Whistleblowing & Investigations Policy and LenovoLine training



LenovoLine

Lenovo's Confidential Reporting Hotline



Speak Up

Speak Up about any conduct that may violate our Code, seems unethical, illegal or suspicious.

LenovoLine is operated by an independent, external company and allows individuals to report concerns anonymously. Lenovo does not have access to reporter's phone number, email, or IP address, and all data provided is protected with high-grade encryption.

Access the LenovoLine website or download the mobile App:
<https://lenovo.whispli.com/speakup>

LenovoLine toll free number:
+1 (806) 602-9151



No retaliation

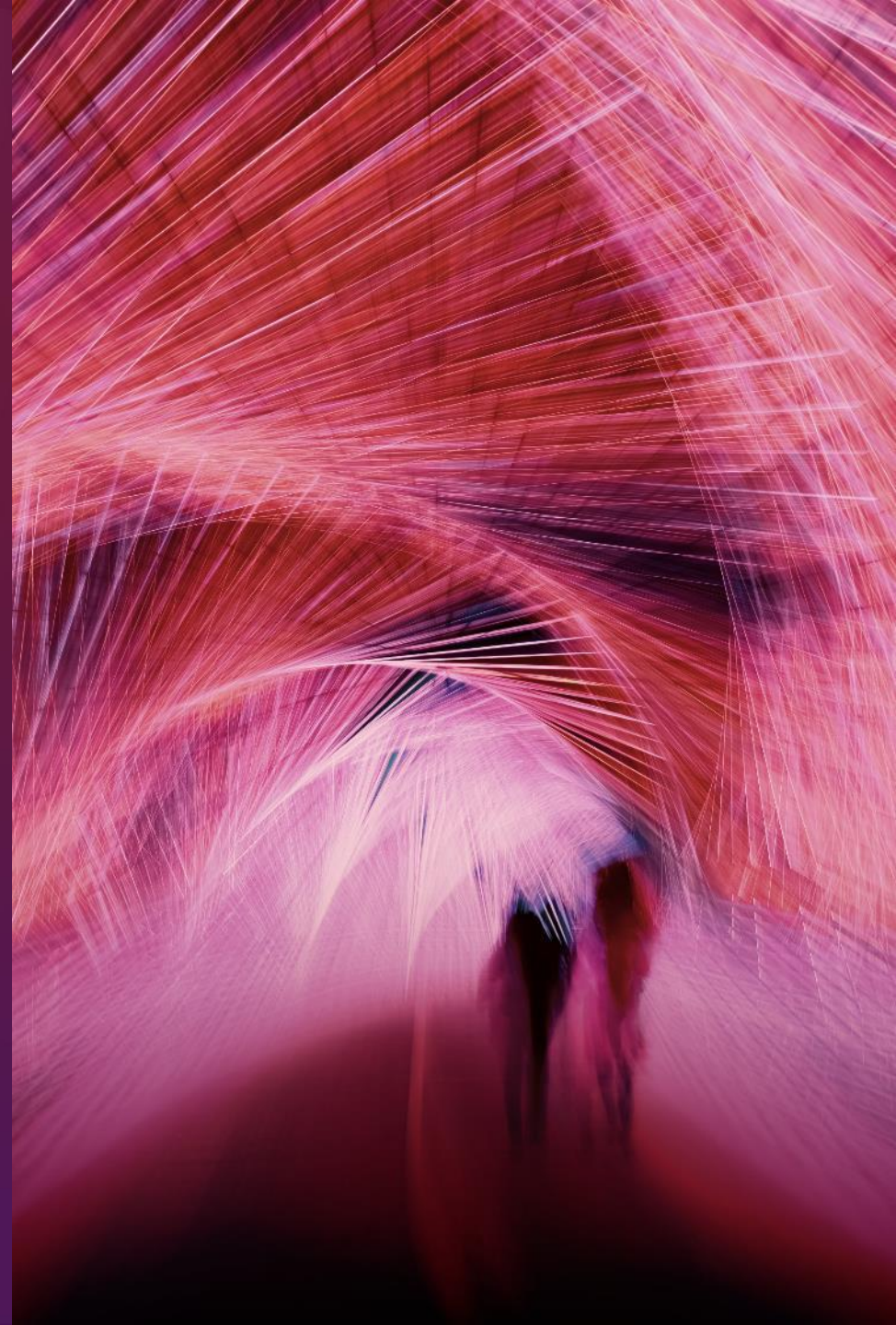
Lenovo upholds a strict zero-tolerance policy against retaliation for those who report concerns in good faith. For more information, consult Lenovo's Code of Conduct.



Questions?



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Smarter
technology
for all

Lenovo

thanks.



**INVESTOR ALLIANCE
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Mary Beth Gallagher

Q&A



Investor Alliance for Human Rights

A collective action platform connecting institutional investors with tools and strategies to promote corporate respect for human rights.

Join Us

For more information, contact: [Rebecca DeWinter-Schmitt](#)