



National Contact Points for Responsible Business Conduct in a changing landscape

2024 Annual Report on NCP Activity

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are recommendations from governments to business on how to act responsibly. Governments adhering to the Guidelines are required to set up National Contact Points for Responsible Business Conduct (NCPs) to further the implementation of the Guidelines. NCPs are the unique implementation mechanism of the Guidelines and currently exist in 52 countries.

A separate document containing all the data reported by NCPs can be accessed in the online [annex](#).

NCPs:

1. Promote responsible business conduct (RBC) with business and other stakeholders
2. Act as non-judicial grievance mechanisms to contribute to the resolution of issues related to the implementation of the Guidelines
3. May provide support for government policies to promote RBC.

Each year, NCPs report on their activities to the OECD. This report presents the key findings relating to how NCPs address their responsibilities.

At a glance: How did NCPs do in 2024?

POSITIVE TRENDS



The NCP grievance mechanism

56 cases received, second highest yearly total

57% of cases with mediation led to agreement

52 cases closed



Promotion

471 events organised, co-organised or featuring NCPs

45,000 people reached by NCP promotion



Support for government efforts to promote RBC

78% of Adherents that adopted or are developing national action plans on RBC or BHR involve(d) NCPs in the process

56% of NCPs reported involvement in intergovernmental mechanisms regarding RBC



Institutional arrangements

83% of NCPs include stakeholders in their institutional arrangements



Peer reviews and capacity-building

95% of peer review recommendations were fully or partially implemented one year after peer review completion

AREAS FOR ATTENTION

17 NCPs received a case, compared to 25 in 2023, and 35% of NCPs have not received a case in the last five years

1053 day average case duration

6 NCPs do not have case-handling procedures

6 NCPs did not engage in any promotional activity in 2024

46% of NCPs did not have a promotional plan

10% decrease in the involvement of NCPs in the development of policies and regulations that reference the Guidelines

41% of the NCP Network operated with one or fewer full-time equivalent staff

58% of NCPs reported staff turnover in 2024

7 NCPs did not undergo peer review under the voluntary system

2024: laying the groundwork for a new cycle of peer reviews

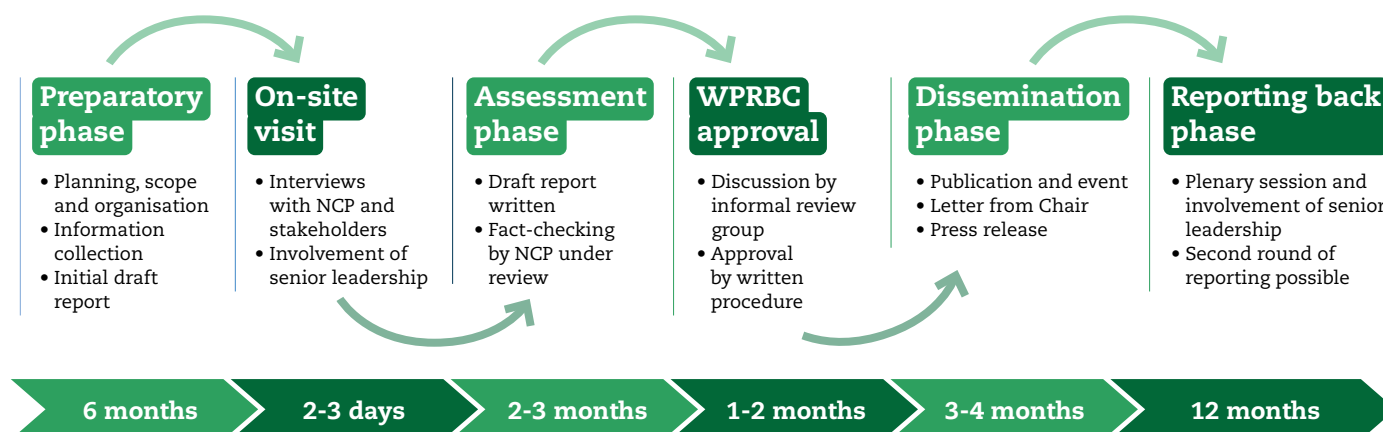
What is an NCP peer review?

Peer reviews are the main way through which NCPs' effectiveness is assessed and reinforced. Peer reviews highlight the achievements and challenges of individual NCPs, and result in public reports containing recommendations for improvement. Peer reviews are facilitated by the Secretariat and carried out by representatives of different NCPs who conduct an on-site visit to the NCP under review, meet with government, business, trade union, and civil society stakeholders and provide recommendations to strengthen the NCP. Recommendations are discussed by the Working Party on Responsible Business Conduct and the OECD Investment Committee before publication.

How has the peer review system changed under the 2023 Guidelines?

Between 2009 and 2024, peer reviews were conducted on a voluntary basis, and proved to be one of the most effective methods for strengthening NCPs. In the years after undergoing a peer review, NCPs have reported increases in absolute staff numbers, increased promotional activity and increases in specific instance submissions. Consequently, the 2023 update of the Guidelines made NCP peer reviews mandatory and periodic according to a revised set of modalities available [here](#). These peer reviews will start in 2025 and follow a seven-year cycle. (See the schedule, [link](#))

The NCP peer review process at a glance



Welcoming the NCP of Mauritius

Mauritius joins the NCP Network as the 52nd NCP!

Mauritius adhered to the Declaration on International Investment and Multinational Enterprises on 6 September 2024.

The NCP of Mauritius includes an **NCP Secretariat**, an **Advisory Panel** and an **Expert Panel**.

- The **NCP Secretariat**, which consists of four officers from the Economic Development Board Mauritius, is responsible for addressing the NCP's promotional responsibilities.
- The **Advisory Panel** consists of representatives of the public and private sectors, including civil society and trade unions. The Advisory Panel provides recommendations on how the NCP can contribute to the effectiveness of the Guidelines.
- The **Expert Panel** is an ad hoc non-judicial panel set up to address specific instances. It consists of at least three persons with expertise in law and dispute resolution.

Visit the Mauritius [NCP website](#) to learn more.

The NCP grievance mechanism

Individuals or organisations from any country can submit a case (referred to as a “specific instance”) to an NCP regarding the conduct of a company operating in or from the country of the NCP. NCPs handle such cases by conducting an initial assessment, offering mediation, issuing recommendations, and making public statements. [Click here to learn how NCPs handle specific instances.](#)

Cases are handled according to each NCP’s own case-handling procedures. In 2024, 46 NCPs had adopted such procedures, meaning that six NCPs were still missing this foundational step to receiving and handling cases. Twenty-one NCPs modified their case-handling procedures in 2024, including updates to align with the 2023 Guidelines. Nearly three-quarters (71%) of these updates involved stakeholder consultations.

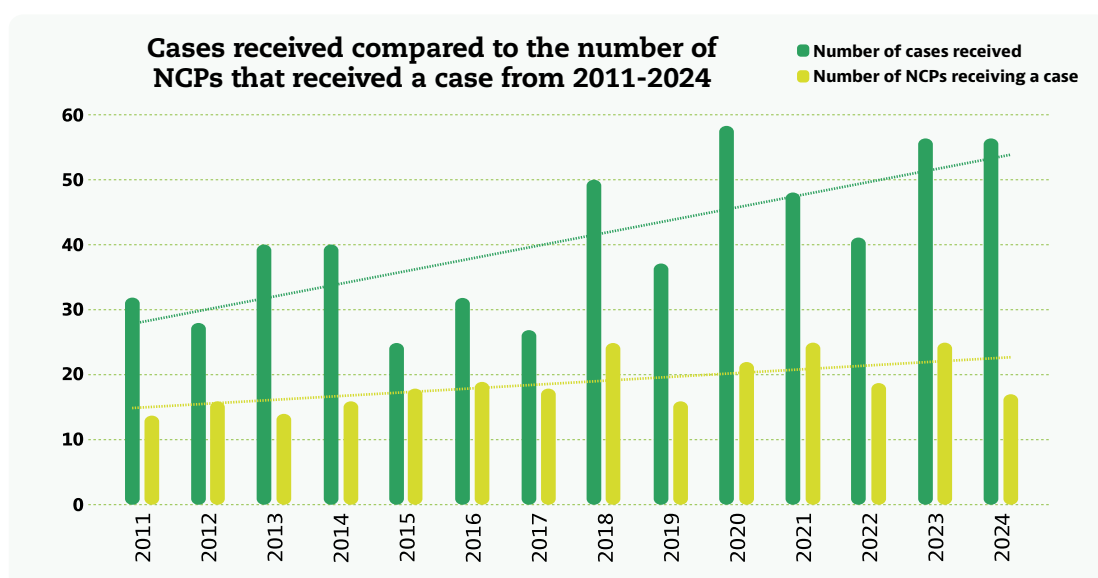
NCP case submissions remain high but are unevenly spread across the Network

56

With 56 cases, 2024 had the second highest submission rate on record.

35%

of NCPs have not received a case in the last five years



When did the NCP receive its last case?

Within the last year	Australia, Austria, Canada, Chile, Denmark, France, Germany, Japan, Korea, Luxembourg, the Netherlands, Poland, Spain, Sweden, Switzerland, United Kingdom, United States
1-5 years ago	Argentina, Belgium, Brazil, Colombia, Finland, Hungary, Ireland, Israel, Italy, Kazakhstan, Latvia, Lithuania, Mexico, Morocco, Norway, Peru, Türkiye
5-9 years ago	Czechia, New Zealand, Slovenia
More than ten years ago	Portugal
The NCP has not received a case	Bulgaria*, Costa Rica, Croatia*, Egypt, Estonia, Greece, Iceland, Jordan, Mauritius*, Romania, Slovak Republic, Tunisia, Ukraine, Uruguay*

*NCPs that adhered in the last five years

16%

decrease in the number of NCPs that received at least one case during the year

NCPs help resolve grievances related to business activity. Submission rates remained high in 2024 with 56 cases received. Since 2011, the NCP network has experienced an average 12% annual growth in cases received.

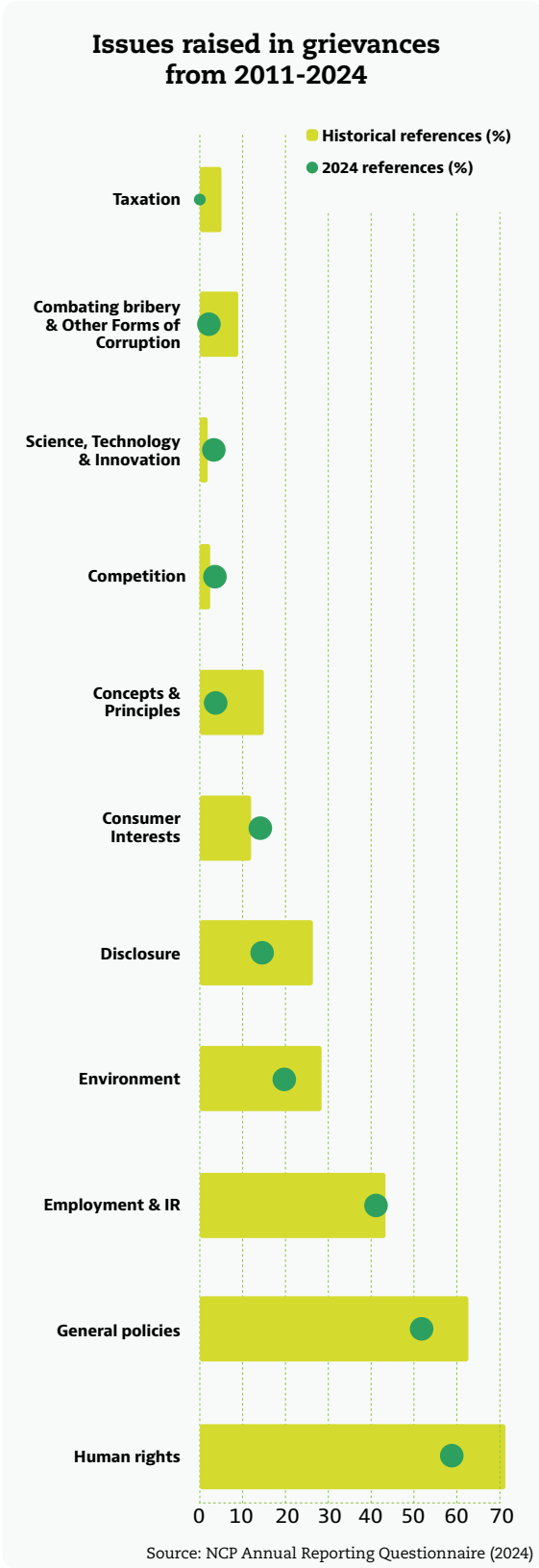
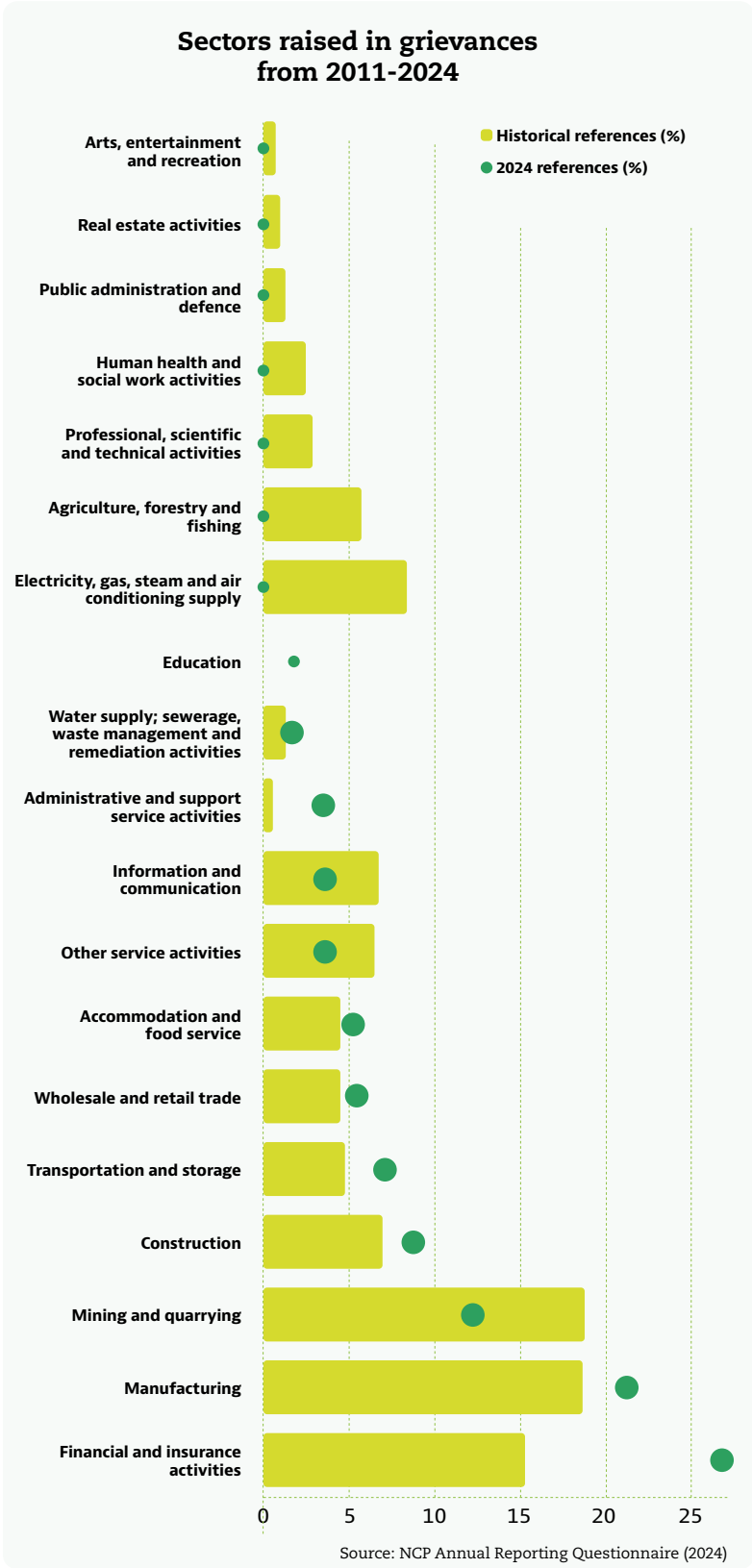
However, in 2024 fewer NCPs received submissions than in previous years.

Seventeen NCPs representing a third of the network received at least one case in 2024, a 16% decrease compared to 2023 and the lowest rate in the last five years, despite an increasing number of NCPs within the Network. While a variety of factors may play into the number of cases received by an NCP, such as the length of time that an NCP has been established, caseloads are uneven and increasingly concentrated within a segment of the Network.

Sectors and issues: Financial and insurance activities is the most prominent sector involved in submissions, receiving almost double historical submission rates.

In 2024, the three most raised sectors in grievances were: financial and insurance activities (15 cases), manufacturing (12), and mining and quarrying (7).

The three most raised issues were: human rights (33 cases), general policies/due diligence (29), and employment and industrial relations (23).



While key sectors raised differ to some extent each year, some trends hold. Financial and insurance activities, manufacturing, and mining and quarrying are historically the top three most cited sectors in cases, although in 2024, the number of cases concerning the financial sector was almost double the historical average. 2024 also saw the second ever case referencing the Education sector, the first having been received in 2017.

Human rights remains the most frequently raised issue, having been cited in the most cases since its introduction to the Guidelines in 2011. 'General Policies', i.e. the provisions on due diligence, has consistently been a close second. Case submissions also referenced some of the historically less cited chapters, including two cases related to competition. The chapter on consumer interests additionally saw a 5% increase compared to historical references, the highest increase of all chapters in 2024.

NCP cases demonstrate the global reach of the mechanism

NCPs can handle cases regarding a company operating in or from the territory of their country. This means that NCPs have a global reach, being able to address issues in countries that do not adhere to the Guidelines. Since 2000, NCPs have handled cases with issues arising in over 110 different countries or territories. In 2024, NCPs reported receiving cases with issues arising in 37 different countries, compared to 31 in 2023. Among these 37 countries,

16 (43%) were countries not adhering to the Guidelines. In 2024, Chile (9 cases), Myanmar (7 cases), and the United States (5 cases) were the most referenced countries in which issues arose.

Looking at the extra-territorial activity of NCPs, nineteen of the cases received in 2024 (34%) were submitted to the NCP of the country where the issues

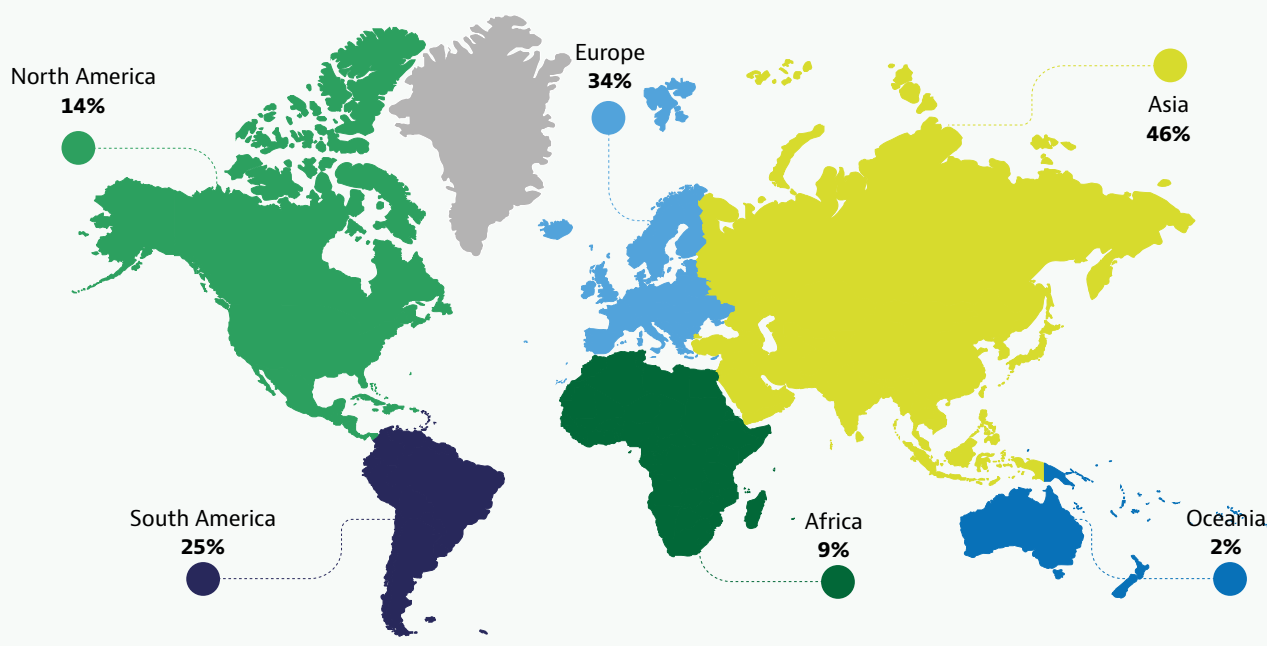
are taking place, which means that in at least two thirds of cases, NCPs were addressing issues involving company operations outside of their country. However, there seems to be a trend in having the NCP of the country of company headquarters lead specific instances. For example, in 57% of the cases closed in 2024 concerning a company headquartered in an adherent country with issues taking place in another adherent country, the NCP of the country of the headquarters was chosen to handle the case.

Finally, while NCPs can receive cases involving companies headquartered in non-adherent countries and with operations in adherent countries, it is not common that they do so (0% of closed cases in 2024, and 5% in 2023).

37

host countries
in cases,
demonstrating
the global reach
of NCPs

NCP cases received in 2024 concern issues arising in 37 different countries across six continents



Mediation continues to yield high levels of agreement

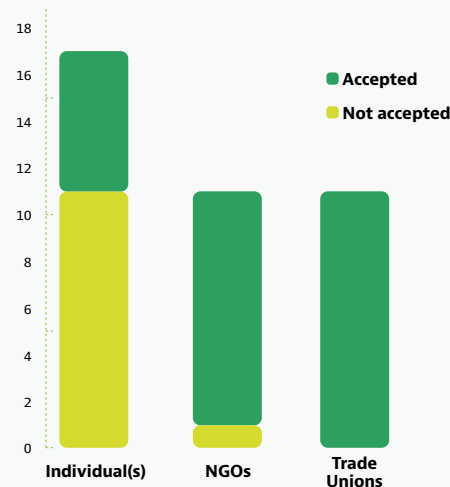
The primary goal of the NCP grievance mechanism is to facilitate agreement between parties using ‘good offices’. NCPs closed (concluded or did not accept) 52 cases in 2024, compared to 44 in 2023.

NCPs accept cases in line with historical trends

In order for a case to progress to the good offices phase, it must first pass initial assessment, during which the NCP evaluates whether the issues merit further examination. In 2024, 58% of cases were accepted for further examination. This represents a slight decrease from 2023 when 66% of cases were accepted. When excluding legacy cases from New Zealand¹, the acceptance rate in 2024 rises to 64%.

Acceptance rates remain uneven across different types of submitters in 2024. Looking at cases closed in 2024, all 11 cases submitted by trade unions had been accepted after the initial assessment. Of the 19 cases submitted by NGOs, 63% were accepted, though this rises to 83% when excluding the legacy cases closed by New Zealand. Continuing a trend of previous years, individuals have the lowest acceptance rate at just 35% of the 17 cases submitted, a slight decrease from 2023 when 50% of cases submitted by individuals were accepted. This shows that individuals may be experiencing difficulties building acceptable cases and need increased support from NCPs in doing so.

Acceptance status of cases closed in 2024 by stakeholder group



Note: graph does not include six legacy cases closed by the NCP of New Zealand

2/3

acceptance rates hold with previous trends

NCP cases led to seven agreements in 2024²

When a case is accepted and progresses to good offices, mediation is generally the preferred method of NCPs in facilitating agreement. Agreements between parties are often confidential, but may include provisions for continued dialogue, a stakeholder engagement strategy, some form of remedy such as compensation or reparation, or improvements to the company's due diligence.

Agreement rates vary from year to year, with 2023 seeing a particularly high rate of agreement when eight out of eleven cases (73%) involving mediation led to agreement. While lower than 2023, agreement rates surpassed historical averages in 2024 as agreements were reached in 57% of cases with mediation (four out of seven cases where the me-

diation status was known). This continues to demonstrate the success of mediation in the NCP process.

In a majority of cases (56%) where agreement could not be reached, an agreement was not possible because the company declined to engage in mediation. This is a slight decrease from 2023 when 64% of cases without agreement were due to company refusal to engage, and a slight increase compared to the average rate (51%) at which companies declined to engage in mediation over the last five years. In 2024, when parties engaged in the NCP case process in good faith, only 19% of cases did not result in agreement.³

57%

cases with mediation led to agreement

1. The NCP of New Zealand received eight cases in 2015 that were not formally closed until 2024 due to administrative issues.

2. Outcomes of all cases closed in 2024 can be found in the data annex.

3. Agreements may also not be reached in the case of insufficient process (delays) or the exact reason may not be reported.

Due diligence obligations for institutional investors

On 5 April 2023, the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations, submitted a specific instance to the Swiss NCP alleging that Lombard Odier, an independent Swiss banking group, had not observed the Guidelines. Specifically, the submitters alleged that Nagaworld, a hotel operator in which Lombard Odier is an investor, violated rights related to trade unions, including dismissals, imprisonment of strikers, violence and threats, and transfer of strikers. The submitters considered that, by not conducting adequate due diligence relating to their investments, Lombard Odier had not observed the Guidelines.

On 20 February 2024, the NCP published a final statement concluding the specific instance with agreement between the parties. Following mediation, the parties agreed on a joint commitment on human rights, confirming their alignment on fundamental principles such as: forbidding abuses; ensuring freedom of association, collective bargaining, and striking; and emphasising the role of the investment community in such issues. The Parties decided that Lombard Odier would participate in a proposal to bring together other institutional investors in a collaborative collective engagement, together with the IUF, in a forum to be co-facilitated by the Swiss NCP to seek NagaCorp's full compliance with the Guidelines relating to labour rights.

Source: International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF) & Lombard Odier, <https://mneguidelines.oecd.org/database/instances/ch0026.htm>

NCP cases promote RBC beyond agreements

In addition to agreements, NCPs may facilitate other outcomes that promote RBC. This could include:



Recommendations

- NCPs can issue recommendations to one or both parties on solving the issues or further implementation of the Guidelines.
- In 2024, recommendations were issued in 70% of final statements, and in 78% of final statements where the parties did not reach agreement. This is a slight increase compared to 2023 when 63% of final statements, and 77% of final statements where parties did not reach agreement included recommendations.



Determinations

- Some NCPs have the practice of issuing a determination as to whether or not a company has acted in accordance with the Guidelines. This is most often the case when a company has refused to engage in the specific instance process, or the parties were unable to reach an agreement.

- Determinations were issued in five cases concluded in 2024 (22% of cases without agreement). Four cases determined that the company had not observed the Guidelines, and one case determined observance related to some issues raised but not others. This represents a decrease from 2023 when 36% of cases concluded without agreement led to a determination.



Follow up

- Many NCPs have the practice of following up on the implementation of agreements or recommendations reached during the NCP's good offices. Following good practice developed by NCPs, the 2023 update of the Guidelines added the expectation that NCPs follow up on agreement or recommendations where relevant.
- Over half (53%) of final statements in 2024 included plans for follow up. No follow up was planned in the two cases that were concluded with agreement reached outside of the NCP process. This represents a slight increase compared to 2023 when 50% of final statements referenced plans for follow up.

Summary of outcomes of cases concluded in 2024

Agreements

57% of cases with mediation

Recommendations

70% of final statements
78% of final statements without agreements

Determinations

13% of final statements contain determination that company did not observe the Guidelines

Follow up

53% of final statements include plans for follow up

Human rights violations in conflict affected areas

On 10 September 2022, United Tegar Canada, a Canadian NGO with a mission to advocate and amplify the voices of the Tigrayan people, submitted a specific instance to the Canadian NCP alleging that East Africa Metals Inc., a mineral exploration company, had not observed the Guidelines. Specifically, the submitter claimed that by operating in Ethiopia – and by paying taxes/licensing fees to the Government of Ethiopia – East Africa Metals Inc. is or has been involved with and/or contributing to adverse human rights impacts linked to violations allegedly committed by that country's government in the context of the Tigray conflict. The submitter also questioned if the company had a policy commitment to human rights and was undertaking appropriate human rights due diligence. The NCP partially accepted the case relating to a policy commitment to human rights and human rights due diligence.

On 7 June 2024, the NCP published a final statement concluding the case. While the parties did not reach a formal agreement, they engaged in a constructive dialogue. The final statement includes recommendations that the company:

- undertake more public communication about its due diligence activities
- consider further elaborating its policy commitment to respect human rights
- give ongoing consideration to how its policy commitment to human rights and due diligence will be fulfilled in the context of its business relationships

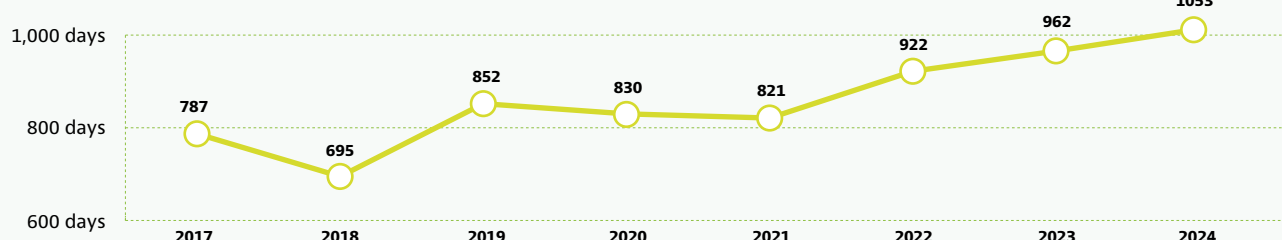
Source: United Tegar Canada & East Africa Metals Inc.
<https://mneguidelines.oecd.org/database/instances/ca0029.htm>

Case timelines continue to rise in concerning trend

The NCP grievance mechanism can be attractive to potential submitters for many reasons, such as the variety of thematic issues, the global reach of the mechanism, or because it is offered at no cost to the parties. Submitters may also be drawn to the NCP mechanism due to its short indicative time frame (12-14 months) to handle cases

as compared to some judicial process, for example. However, handling cases within the indicative timeframe continues to pose a challenge for many NCPs. 2024 represented the third consecutive yearly increase in case timelines, rising by almost 100 days on average.

Average concluded case duration in days by conclusion year



Source: NCP Annual Reporting Questionnaire (2024)

Note: 2024 timeline excludes cases from the NCP of New Zealand that were received in 2015 but not formerly concluded until 2024 due to administrative issues. When included, the average case duration rises to 1214 days.



KEY TAKEAWAYS ON THE NCP GRIEVANCE MECHANISM IN 2024

56 cases received

Second highest number of submissions on record

57% of cases with mediation led to agreement

Mediation continues to yield high agreement rate

52 cases closed

Increase compared to 44 in 2023

17 NCPs received a case, compared to 25 in 2023, and 35% of NCP have not received a case in the last five years

Cases increasingly concentrated with a few NCPs

1053 day average case duration

Third year of increasing case durations

6 NCPs do not have case-handling procedures

Not all NCPs are prepared to address grievances



2

Promotion

An important function of NCPs is to promote awareness of the Guidelines and the related due diligence guidance, as well as the visibility of the NCP itself. This requires sustained efforts to raise awareness among the business community, worker organisations, civil society organisations and other interested parties.

NCPs continued high levels of promotion in 2024

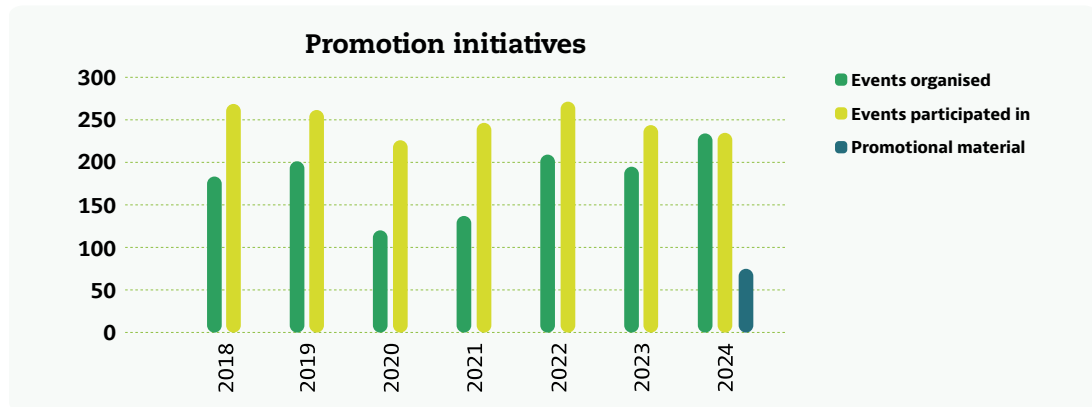
Continuing recent trends, NCPs maintained high levels of promotion in 2024. Forty-one NCPs organised or co-organised 235 events and 35 NCPs participated in 236 events organised by others. Audience sizes varied, ranging from promotional events with less than ten attendees to events with over 100 in attendance reaching more than 17,000 people in

total. This is a decrease compared to 2023, partly due to a change in the counting of promotional initiatives, with the inclusion of a separate

category for promotional materials, which were previously included with event promotion. When accounting for the additional audiences reached as reported in promotion beyond events, the number of people reached by promotional initiatives exceeds 45,000. Overall, there was high promotional activity despite a busy year for specific instance submissions. It is important to remember that promotional events or materials are not the only outlet for NCPs promotion, and many NCPs contribute to awareness raising in other ways, for example through the maintenance of the NCP website.

45,000

people reached by
NCP promotion



NCPs show creativity and innovation in promotion beyond event formats

To better reflect the breadth and variety of the work done by NCPs to address their promotional responsibilities, in 2024 NCPs were invited to report promotional efforts beyond the organisation and participation in promotional events. Developing promotional materials can be a less resource-intensive form of promotion for many NCPs. In 2024, 26 NCPs re-

ported 76 promotional works outside of a traditional events format. These promotional materials reached an estimated audience of over 28,000 people in 2024. Of the 76 reported promotional works, Newsletters (19%), brochures or similar (16%), and flyers (10%) were the most commonly reported types of work.



Brochure developed by the Croatian NCP on the Guidelines and role of the NCP

NCPs additionally reported conducting email or mail campaigns for promotion, and preparing promotional videos. Other types of formats reported include articles or advertisements in the news and translation of promotional materials into local languages.

EXAMPLE of NCPs reinforcing the implementation of the Guidelines in 2024

Translation of the Recommendation on the Role of Government in Promoting Responsible Business Conduct into Turkish

On 9 October 2024, the Turkish NCP co-organised an event held by the Ministry of Industry and Technology to launch the translation of the Recommendation into Turkish. The event included awareness raising around RBC and the Recommendation, including a roundtable of government policy measures in Türkiye on how to integrate RBC.

Learn more: <https://www.linkedin.com/company/ocdturkiyencp/posts/?feedView=all>



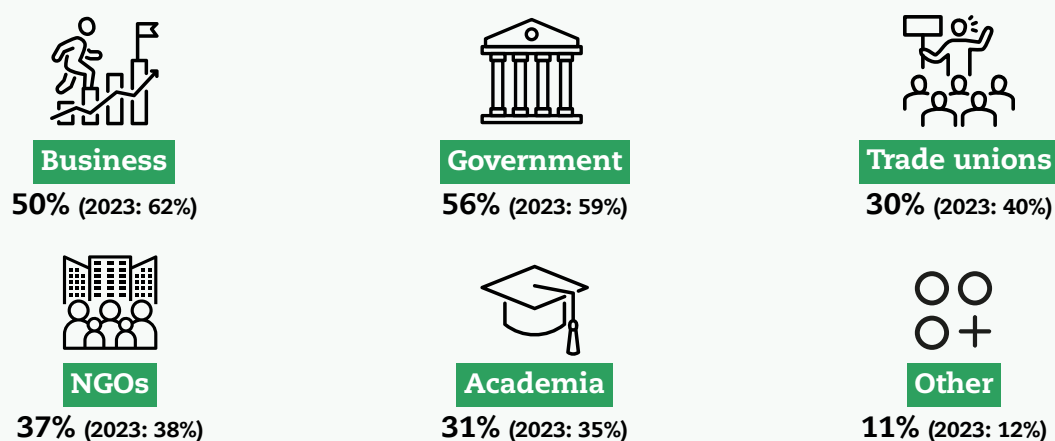
NCP events are primarily targeted at business and government audiences

NCPs are expected to offer promotional activities to a diverse and representative range of stakeholders. In 2024, like in 2023, NCPs organised or co-organised more events addressed to government (56%) or business (50%) representatives than to trade unions (30%), NGOs (37%) and academia (31%), confirming the tendency across the

network to address promotion unevenly to different stakeholder groups. Best practice in this regard has been the development of a promotional plan, which 54% of NCPs had reported developing for the coming year(s), representing the fourth consecutive decrease in NCPs with promotional plans⁴.

54%
of NCPs have promotional plans, down from 67% in 2021

Target audience at events organised or co-organised by NCPs (2023-2024)



Note: Since 39% of events were addressed to more than one stakeholder category, the total percentage exceeds 100%.

NCPs can further support the creation of an enabling policy environment for RBC in line with the Recommendation on the Role of Government to Promote RBC (see below) through their engage-

ment with other government officials and agencies. In 2024, almost half (47%) of NCPs reported promoting the Recommendation among relevant government officials.

⁴ Complete information on NCPs with promotional plans can be found in the data annex.

Partnering with Academia in promoting due diligence and the role of the NCP

On 11 April 2024, the Polish OECD NCP participated in a Thursday's Forum Meeting at the Warsaw School of Economics (SGH), engaging in a discussion on "Due diligence in responsible business conduct."

The event brought together key stakeholders, including representatives from business, NGOs, trade unions, academia, government, and other sectors, to explore the significance of due diligence processes for companies. The discussion also emphasized the crucial role of the NCP in fostering responsible business practices and addressing cases related to potential breaches of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Source: [SGH Thursday Forum #62: Due Diligence in Responsible Business Conduct](#)



NCP websites remain important as social media use decreases across the Network

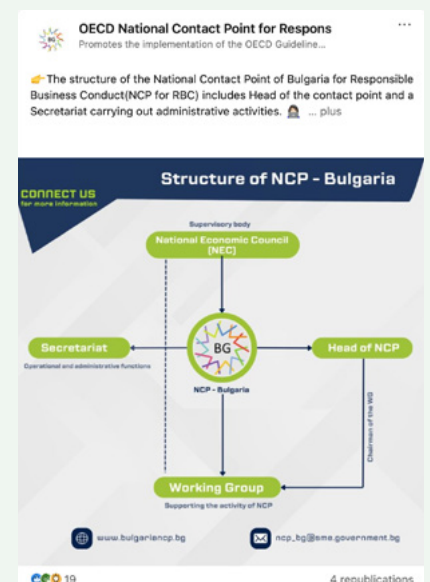
NCPs maintain dedicated websites or webpages to increase visibility and publicly display information on case handling and NCP updates. For many stakeholders, NCP websites have served as a principal point of contact for submitting specific instances. In 2024, 49 NCPs had dedicated websites

or webpages. In addition, 42% of NCPs reported using social media for promotion, a decrease from the 59% of NCPs that reported using social media in 2023. NCPs utilised Facebook, LinkedIn, X, and YouTube for promotion.

Effective promotion of OECD Guidelines on social media

The LinkedIn account of the Bulgarian NCP regularly publishes posts highlighting NCP news, as well as informational content on each chapter of the Guidelines. These posts feature eye-catching designs, making the content more accessible and engaging for a broader audience. This is a valuable practice to enhance awareness and understanding of the Guidelines, serving as a great example to follow.

Learn more: <https://www.linkedin.com/in/oecd-national-contact-point-for-responsible-business-conduct-bulgaria-531ab72b9/recent-activity/all/>



KEY TAKEAWAYS ON PROMOTION IN 2024

471 events organised, co-organised or featuring NCPs

45,000 people reached by NCP promotional efforts

High and impactful promotional activity

6 NCPs did not engage in any promotional activity in 2024

Certain NCPs remain inactive

46% of NCPs did not have a promotional plan

Fourth consecutive decrease in promotional plans



Support for government efforts to promote RBC

According to the Guidelines, NCPs can lend support to their governments' efforts in the development, implementation, and coherence of public policies to promote RBC. This can include, for example, providing expertise on due diligence policies, or leading or participating in the development of national action plans and strategies on RBC.

This role for the NCP is further supported by the [OECD Recommendation on the Role of Government on Promoting Responsible Business Conduct](#) (the Recommendation), which recognises the role that NCPs can play in promoting policy coherence for RBC.

3

NCP involvement in the development of RBC regulations and policies continues

In 2024, 15 NCPs reported references to the Guidelines, the OECD due diligence guidance, or the Recommendation in regulations and policies adopted by their governments that year. Of these 15 NCPs, two-thirds (67%) reported that the NCP was involved in or consulted during their

development. This represents a small decrease from 2023 when 77% reported involvement or consultation in such development. In addition, six NCPs (40%) reported that such adopted instruments make reference to the NCP and/or give a role to the NCP in its implementation.

67%

Among countries that adopted policies referencing OECD RBC instruments, 67% involved NCPs in development

Ukraine Strategy for Recovery, Sustainable Development, and Digital Transformation of Small and Medium Enterprises (SMEs) for 2024–2027

Approved on 30 August 2024, Ukraine has adopted a new Strategy for Recovery, Sustainable Development and Digital Transformation of Small and Medium Enterprises for the period up to 2027 and approved the operational action plan for its implementation in 2024–2027. The Ukrainian NCP reported that it had been involved during the development of this strategy.

This strategy and its Action Plan promote SME growth, emphasizing digital transformation, sustainability and alignment with responsible business conduct principles. The strategy includes:

- development and dissemination of tools for integrating responsible business conduct standards, such as raising awareness of the standards reflected in the UN Guiding Principles, OECD Guidelines, and other relevant documents;
- organising training programs, providing advisory and expert support,
- and introducing self-assessment tools for SMEs to evaluate compliance with RBC standards

The Guidelines are referenced specifically under operational objective 3.2 on responsible and inclusive entrepreneurship, notably in relation to raising awareness of the standards of RBC.

Learn more (Ukrainian): <https://zakon.rada.gov.ua/laws/show/821-2024-%D1%80#Text>

EXAMPLE of NCPs reinforcing the implementation of the Guidelines in 2024

NCPs can play a coordinating role in RBC policy

In 2024, 29 NCPs (56%) reported involvement in intergovernmental coordination mechanisms regarding policy areas covered by the Guidelines and/or relevant for RBC. These coordination mechanisms related to a variety of workstreams such as the EU-Mercosur agree-

ment, the CSDDD, National Action Plans, environmental initiatives and agreements, and interministerial working groups relating to RBC more generally.⁵ In some cases, the NCP itself acted as or led the intergovernmental coordination mechanism.

56%

of NCPs reported involvement in intergovernmental mechanisms regarding RBC policy areas

5. The Secretariat maintains a list of regulation referencing the Guidelines. See the OECD Due Diligence Policy Hub: <https://web.archive.oecd.org/2024-06-19/618402-due-diligence-policy-hub.htm>

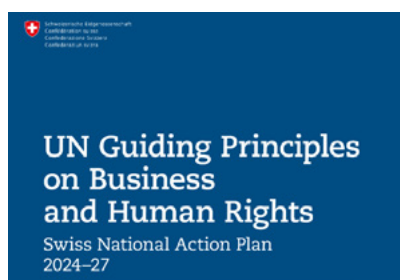
NCPs coordinate with one another on their potential role in RBC policy

At the November 2024 meeting of the NCP Network in Paris, NCPs discussed the implications for NCPs relating to the adoption of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD). Twenty-five Adherents to the Guidelines are EU Member States and the CSDDD directly references NCPs. NCPs have identified a number of areas where the implementation of the directive could interrelate with their role, such as a potential role for the NCPs in transposition and implementation of the CSDDD, provisions on promotional work related to promotion done by NCPs, the role of NCPs in relation to supervisory authorities, and the role of the NCP non-judicial grievance mechanism related to remediation of impacts covered by the CSDDD. In 2024, NCPs additionally organised and participated in 30 events at national level related to the CSDDD as part of their promotional due diligence.

NCP involvement in National Action Plans and strategies related to RBC remains high

In 2024, 18 National Action Plans (NAPs) on Business and Human Rights (BHR) or RBC were adopted (4)⁶ or in development (14) in adherent countries. In all four adopted NAPs, both the Guidelines and the NCP were referenced in the text of the NAP. One NAP additionally made reference to the OECD due diligence guidance and the Recommendation.

NCPs in 78% of the countries that adopted or were in the process of developing a NAP reported involvement in its development. This represents a slight decrease from 2023 when 85% of NAPs adopted or in development involved NCP participation. Additionally, 79% of NCPs in the countries with NAPs in development reported that a role was foreseen for them in the implementation of the NAP. These numbers continue to show the role that NCPs can play in supporting their government efforts to promote RBC, both in the development and implementation of related policy.



NAP on BHR of Switzerland

Learn more: https://www.nap-bhr.admin.ch/napbhr/en/home/nap/nationaler_aktionsplan1.html

6. Belgium, France, Switzerland, the United States.



KEY TAKEAWAYS ON NCP SUPPORT FOR GOVERNMENT EFFORTS TO PROMOTE RBC

78% of Adherents that adopted or are developing national action plans on RBC or BHR involve(d) NCPs in the process

NCPs are frequently involved in development of NAPs

56% of NCPs reported involvement in intergovernmental mechanisms regarding RBC

NCPs act as government focal points on RBC issues

10% decrease in the involvement of NCPs in the development of policies and regulations that reference the Guidelines

NCP involvement remains high but has decreased compared to 2023



Institutional arrangements

4

NCP structures in 2024

NCP institutional arrangements refer to the structuring and operations of an NCP, including how they engage with or incorporate stakeholder participation. Governments have flexibility in how they structure their NCPs so long as they make available the human and financial resources necessary for the NCP to fulfil their responsibilities.

19 Single agency NCPs

The NCP is composed of one official in a single ministry, or by a group of officials belonging to the same service in the same ministry.

11 Inter-agency NCPs

The NCP is composed of a group of representatives from several ministries or government agencies, usually with a Secretariat located in one of these ministries, composed of one or more officials.

14 Multipartite NCPs

The NCP is composed of a group of government officials and stakeholder representatives, usually with a Secretariat located in one of the government agencies represented in the NCP.

4 Expert-based NCPs

The NCP is composed of experts who are appointed by, but external to, the government.

3 Hybrid NCPs

Composed of elements derived from different models above.

Note: Some NCPs choose to support their main structural body with a multi-stakeholder or interagency advisory body. In 2024, 33 NCPs have one or more advisory bodies (including 15 Single Agency NCPs and 8 Inter-Agency NCPs).

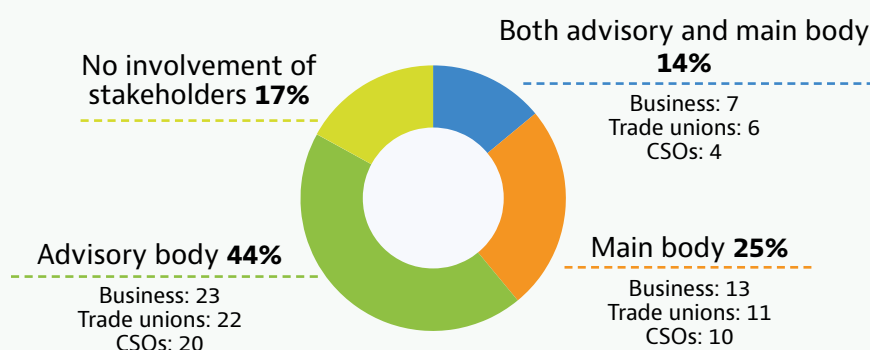
Note for Greece: the NCP is currently working to define a structure following a shift in competent authority for the NCP function.

More NCPs included stakeholders in their structures in 2024

A key component of an NCP's effectiveness is its ability to engage with and maintain the confidence of stakeholders. In this regard, incorporating stakeholders into its institutional arrangements - whether through membership in the NCP's main body or a multi-stakeholder advisory body - can enhance the NCP's trustworthiness, expertise, and visibility. Stakeholder inclusion broadens the range of knowledge and perspectives available to the NCP, strengthening its capacity to handle cases effectively and uphold the Guidelines. Moreover, fostering strong stakeholder relations can improve transparency, accessibility and impartial-

ity, ultimately enhancing the NCP's ability to fulfil its responsibilities. In 2024, 83% of NCPs included stakeholders in their institutional arrangements, compared to 80% in 2023. Ireland and Peru both created stakeholder advisory boards in 2024, thereby implementing recommendation from their peer reviews. This continues the trend of NCPs increasingly including stakeholders in their structures, notably as this aspect was reinforced in the updated Guidelines. All stakeholder groups are however not systematically included in NCP structures, as business is included in the structure of 43 NCPs, trade unions 39 NCPs, and CSOs 34 NCPs.

Stakeholder (SHs) involvement in NCPs' institutional arrangements



83%

of NCPs include stakeholders in their institutional arrangements

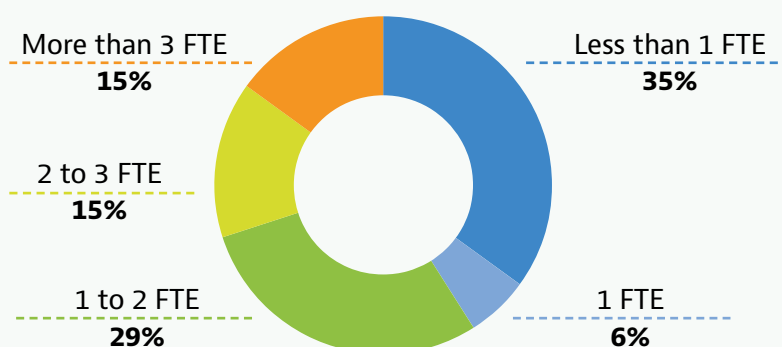
Most NCPs remain under-resourced

More than **1/3**
of the NCP Network
operated with one or
fewer FTE

Another challenge NCPs faced throughout the year was the ongoing difficulty of securing sufficient human and financial resources, which in some cases has limited their ability to effectively fulfil their responsibilities. In line with 2023 the proportion of NCPs operating with more than two full-time equivalent (FTE) staff re-

mained steady, accounting for 30% in 2024. Meanwhile, similar to in 2023, 41% of NCPs were operating with one or fewer full-time equivalent (FTE) staff in 2024, often leaving them under-resourced to effectively address responsibilities. This is a challenge in achieving functional equivalence of NCPs, as a sizeable portion of the NCP network continues to operate with much lower resources than the better resourced NCPs.

FTE staff resources available to the NCP Network in 2024



Note: N=52 - Source: NCP Annual Reporting Questionnaire (2024)

Staff turnover remains high but declines in 2024

58%

of NCPs
reported staff
turnover in 2024

Beyond the total number of staff, staff turnover may impact the effectiveness of NCPs. Staff turnover remained high in 2024 but decreased compared to 2023, dropping from 65% to 58%. Given also

that more NCPs reported staff joining (50%) than staff leaving (44%) in 2024, NCPs overall were operating with more staff, and a more stable staff, than in previous years. Nevertheless, over 1/4 (26%) of NCP staff were new to their roles in 2024. High staff

turnover can strain institutional memory, disrupt continuity in ongoing cases, require NCP resources for training, and weaken stakeholder relations if contacts are not maintained.

More staff

With more staff joining than leaving, and less staff turnover than in 2023, NCPs operated with more staff, and more stable staff than in previous years



KEY TAKEAWAYS ON NCP INSTITUTIONAL ARRANGEMENTS IN 2024

83% of NCPs include stakeholders in their institutional arrangements

Stakeholder engagement in NCP structures remains high

41% of the NCP Network operated with one or fewer FTE

Levels of human resources are stable but still insufficient

58% of NCPs reported staff turnover in 2024

Staff turnover remains high but decreased since 2023

Peer reviews and capacity building

5

NCPs have to achieve ‘functional equivalence’ among NCPs, or in other words, that all NCPs operate with an equivalent degree of effectiveness. Effectiveness of NCPs is defined according to the following criteria: visibility, accessibility, transparency, accountability, impartiality and equitability, predictability, and compatibility with the Guidelines. In order to achieve this, under the supervision of the OECD Investment Committee and Working Party for Responsible Business Conduct, NCPs regularly engage in peer reviews and capacity building activities, such as biannual NCP network meetings, or other training activities.



Delegates of the WPRBC and OECD Secretariat after the November 2024 WPRBC meeting

Peer reviews

NCPs routinely engage in peer reviews as a way to increase effectiveness. Three peer reviews were conducted in 2024 with seven NCPs joining as members of peer review teams.

NCP under review	Visit date	Peer reviewer NCPs
Romania	March	Kazakhstan, Portugal, Spain
Finland	May	Denmark, Ireland
Israel	November	Latvia, Netherlands

This concludes the cycle of voluntary peer reviews, many of which were conducted following the [commitment made at the OECD Ministerial Council Meeting in 2017](#) to have all NCPs peer reviewed by 2023 (extended by one year due to COVID-19). As of the end of the voluntary peer re-

view cycle, the NCPs of Colombia, Egypt, Greece, Jordan, Mexico, Tunisia, and Ukraine had not undergone a peer review. Peer reviews under the new mandatory system (see above) will begin in 2025.

EXAMPLES of NCPs reinforcing the implementation of the Guidelines in 2024



NCPs of Kazakhstan, Portugal, Spain, and Romania, together with the OECD Secretariat and the President of the Romanian Agency for Investments and Foreign Trade at the peer review of the Romanian NCP.

61

recommendations made by peer review teams to NCPs under review

In 2024, seven new NCP peer review reports were published⁷, including a total of 61 recommendations made by peer reviewer NCPs to strengthen the NCPs under review. Recommendations included establishing the NCP as an enabler

of coordination on RBC between different parts of government, developing comprehensive promotional plans, adopting case-handling procedures in line with the 2023 Guidelines, and actively promoting the Recommendation within government.

Nine NCPs reported back on progress made to implement 71 recommendations since their peer review reports were published.⁸ Reporting back highlighted actions NCPs have taken to further the implemen-

tation of the Guidelines, such as increasing engagement with NCP membership and work to increase stakeholder confidence, changing the location of the NCP to safeguard impartiality, and works to develop multi-stakeholder advisory bodies. Out of the 71 recommendations issued to the NCPs reporting back, 26 (37%) had been fully implemented, 41 (58%) had been partially implemented, and four (6%) had not been implemented at the time of reporting back.

95%

of peer review recommendations were fully or partially implemented one year after peer review completion

Other capacity-building and peer-learning activities

As RBC is a dynamic agenda, and new issues and priorities emerge regularly, NCPs constantly have to build capacity, and set themselves specific objectives such as increasing visibility and stakeholder engagement, increasing the expertise available to the network, and ensuring effective and efficient handling of specific instances. Moreover, as a decentralised implementation system composed of 52 entities, the NCP Network needs to coordinate to ensure coherence and consistency in the delivery of their responsibilities. In 2024, NCPs continued to implement the [Action Plan to Strengthen NCPs](#) (2022-2024). A new Action Plan, covering 2025-2027, will take effect in 2025.

The new Action Plan is articulated around the following priorities:

1. **Consolidation:** Building on and leveraging existing materials to address current needs
2. **Compatibility:** Implementing the updated Guidelines and Implementation Procedures
3. **Closing the gap:** Addressing gaps in the achievement of core effectiveness criteria where needed

In 2024, seven NCPs reported hosting a peer-learning activity and 23 NCPs reported attending a peer learning activity hosted by another NCP. Additionally, 25 NCPs reported participating in or hosting a meeting of a regional network of NCPs. NCPs indicated priority areas, such as NCP coordination in case-handling, engaging government in RBC, and mediation, for future peer learning and capacity building.

7. Estonia, Hungary, Iceland, Kazakhstan, Poland, Romania, and Türkiye. The reports are publicly available at [NCP Peer Reviews](#)

8. Czechia, Latvia, Luxembourg, Morocco, New Zealand, Peru, Portugal, Slovak Republic, Slovenia (2nd time reporting back).



KEY TAKEAWAYS ON PEER REVIEWS AND CAPACITY BUILDING IN 2024

95% of peer review recommendations were fully or partially implemented one year after report publication

Peer reviews are an effective mechanism for strengthening NCPs

7 NCPs did not undergo peer review under the voluntary system

Not all NCPs have had the opportunity to receive recommendations for improvements

Peer learning activity hosted by the Austrian NCP in Vienna, Austria

On 22 October 2024, the Austrian NCP organised a peer learning activity in Vienna. The agenda included topics on specific instances and promotional activities, and provided opportunities to go deeper into stakeholder engagement, handling and acquiring resources, collaboration with advisory boards, and support for government efforts to promote RBC.

Participants were further invited to arrive in Vienna on 21 October to attend the Annual Austrian Multi-Stakeholder Forum. The Forum included experts from business, labour, civil society, politics and academia to discuss ongoing developments related to the Guidelines.



2024, a year in review

NCPs continued to develop and bolster many good practices across their areas of responsibility. Specific instance submissions reached record highs for the second year in a row with submissions increasing an average of 12% per year since 2011. Additionally, cases continued to demonstrate the breadth of issues covered by the Guidelines and the role that NCPs can play in remediation. However, challenges remained for NCPs as a significant share of companies continue declining to engage in the grievance mechanism, and following indicative timelines was not always feasible. NCP promotional work remained strong and continued to demonstrate creativity, particularly in the case of often limited resources. Faced with a continuously changing global RBC policy landscape, many NCPs demonstrated the role that they can play in support their governments' efforts to promote RBC and related policies. The strength of the NCP Network was further demonstrated through continued engagement in peer reviews and the numerous opportunities for peer-learning where NCPs came together to support one another. However, many NCPs continued to face challenges related to limited resources, contributing to a widening gap in the functioning of NCPs with higher and lower resource levels. While 2024 showed many strengths for the NCP Network, 2025 will be an opportunity to address continuous challenges and work further towards functional equivalence for all NCPs.

Access further data on the NCP Network in 2024 in the annex

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Responsible Business Conduct: [https://www.oecd.org/en/topics/
policy-issues/responsible-business-conduct.html](https://www.oecd.org/en/topics/policy-issues/responsible-business-conduct.html)

