Advancing Human Rights Leadership in Technology Regulation
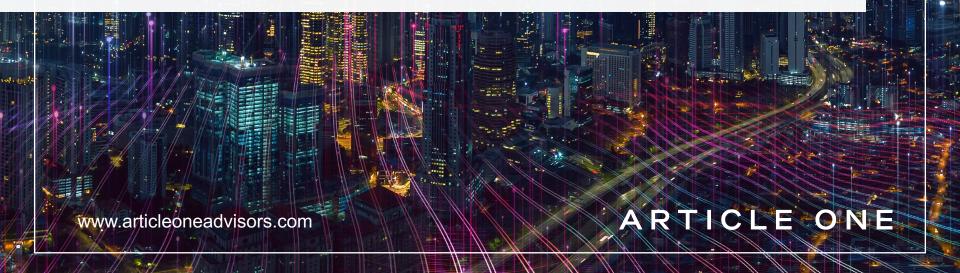
EMERGING TRENDS FROM THE ROUNDTABLE ON HUMAN RIGHTS AND AI

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Human rights expectations for companies in the information and communication technology (ICT) sector are rapidly evolving. While many industry-leading ICT companies have spent years building out programs to advance human rights, responsible technology, and ethical AI, legislators in multiple regions of the world are developing new regulations that will shift many human rights expectations for businesses from voluntary frameworks to concrete obligations. Multiple strands of emerging human rights regulation are relevant for companies in the ICT sector, including mandatory human rights due diligence, digital platform regulation, and regulation focused on artificial intelligence.

As regulatory expectations crystalize, creating space for dialogue and collaboration amongst companies leading technological innovation is more important than ever. Since 2018, Article One's Business Roundtable on Human Rights & AI has convened industry leaders to share common human rights challenges, effective practices, and priorities for the future. Throughout August and September 2023, Article One interviewed 17 Roundtable members and industry leaders to better understand how ICT companies are approaching the shift from voluntary human rights norms to hard law. We spoke to staff working to advance human rights within digital platforms, AI developers, and multinational technology companies. This Briefing Paper explores their perspectives on challenges and concrete opportunities associated with regulation impacting the ICT sector.

Article One's interviews with company teams working on human rights revealed both challenges and new opportunities to advance human rights within ICT regulation. We identified six key trends:

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Six Key Trends	The Challenge	The Opportunity
Centering Human Rights in Regulation	How can companies embed human rights in regulatory compliance strategies?	Company human rights strategies can promote a UNGP-aligned approach to human rights that promotes consistency and efficiency in regulatory compliance.
Strengthening Human Rights Leadership and Resourcing	How can companies best prioritize human rights amid constrained resources?	New regulation can help to increase leadership focus on human rights.
Creating Meaningful Partnerships for Human Rights	How can human rights teams reinforce commitment and cross-functional collaboration for human rights amid new regulatory expectations?	New cross-functional partnerships are necessary for effective compliance and present an opportunity to engage more teams on human rights.
Advancing a Company-wide Approach to Human Rights	How can human rights teams leverage regulation to broadly engage staff on human rights?	Regulation can catalyze human rights training to strengthen awareness and responsibility for advancing human rights.
Navigating the Unintended Consequences of Regulation	How can companies navigate potential unintended consequences of regulation?	Industry leaders have a key role to play in meeting compliance obligations while advancing human rights commitments to transparency and safety.
Reinforcing a Global Commitment to Human Rights	How can companies ensure a focus on global risks amid national and regional regulation?	Companies can use regulatory obligations as a floor for human rights due diligence and governance, not a ceiling.

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The next generation of corporate human rights leadership will require navigating new regulatory obligations targeting digital platforms and AI, as well as horizontal human rights due diligence and modern slavery regulation. Our interviews with corporate human rights leaders revealed some uncertainty, questions, and challenges associated with the emergence of these new requirements. However, at the same time, we heard significant optimism and numerous concrete opportunities for companies to mature their approach to human rights by centering human rights in regulatory compliance strategies.

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Human rights expectations for companies in the information and communication technology (ICT) sector are rapidly evolving. Many industry-leading ICT companies have spent years building out programs to advance human rights, responsible technology, and ethical AI.

These strategies have often been informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and have delivered concrete and, at times, transformative improvements in their products, operations, and supply chains. However, at the same time, commitment to human rights and the UNGPs varies across industries and companies. The 2022 Corporate Human Rights Benchmark, for example, found that nearly fifty percent of companies "failed to show any evidence of identifying or mitigating human rights issues in their supply chains."[1] Even when leading companies have embraced human rights and the UNGPs, these commitments have not always been embedded fully in all relevant aspects of company decision-making to ensure rights-respecting outcomes.

To address uneven corporate commitment to human rights and ongoing corporate human rights impacts, new human rights regulations are emerging around the world, and particularly in

Europe. Regulations impacting the ICT sector will shift many human rights expectations for businesses from voluntary frameworks to concrete obligations. Indeed, many expect human rights and technology regulations to significantly impact ICT companies and reshape the business and human rights field in the years ahead. Multiple strands of emerging regulation are relevant for companies in the ICT sector:

- **Mandatory human rights due diligence**, most notably the proposed Corporate Sustainability Due Diligence Directive (CSDDD), will require companies to define and implement value chain-wide human rights and environmental due diligence.

- **Digital platform regulation**, including the Digital Services Act (DSA) in the EU, have introduced new expectations for the hosting, recommendation, and moderation of user-generated content.

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[1] Business & Human Rights Resource Centre, https://www.business-humanrights.org/en/big-issues/mandatory-due-diligence.

- **Regulation focused on artificial intelligence** (AI), including the proposed EU Artificial Intelligence Act (AI Act), will establish new expectations for the development, sale, and use of AI.

As regulatory expectations crystalize in ways that support and ways that diverge from the UNGPs, creating space for dialogue and collaboration amongst companies leading technological innovation is more important than ever. Since 2018, Article One's Business Roundtable on Human Rights & AI has convened industry leaders to share common human rights challenges, effective practices, and priorities for the future. The theme for the 2023 Roundtable is **Leveraging Emerging Technology Regulation to Advance Human Rights**. Over the course of the year, members have discussed the opportunities, limitations, and management challenges associated with a more regulated human rights and technology industry.

This briefing paper explores priority challenges and opportunities associated with regulation impacting the ICT sector. Throughout August and September 2023, Article One interviewed 17 Roundtable members and industry leaders to better understand how ICT companies are approaching the shift from voluntary human rights norms to hard law.[2] We spoke to staff working to advance human rights within digital platforms, AI developers, and

multinational technology companies. The research objectives of this project were to:

- **Deepen collective understanding** of how leading companies are navigating new regulatory human rights requirements.

- **Identify opportunities and challenges to centering human rights** in regulatory compliance to inform a collaborative strategy for proactive engagement.

- **Clarify effective rights-advancing strategies** for exploration within the Roundtable on Human Rights and AI.

This briefing paper explores the perspectives of teams focused on human rights within companies navigating emerging regulation impacting the ICT sector. The paper begins with a summary of the emerging regulatory human rights contexts facing ICT companies. Drawing on interviews with 17 companies, the paper then explores key challenges and opportunities with this evolution as described by teams working on human rights and ethics within ICT companies. The paper concludes with emerging recommendations and priority topics explored through the meetings of the Roundtable on Human Rights & AI.

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[2] Companies interviewed are listed in the Acknowledgements section at the conclusion of this brief.

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ICT companies must navigate an increasingly complex web of country and regional regulations that impact human rights. Relevant technology regulation is expanding beyond an existing focus on privacy and specific thematic areas, for example, modern slavery and forced labor, to new process-related and substantive requirements for digital platforms and AI. Some of these regulations build on the UNGPs and other voluntary frameworks, however regulation often establishes new terminology and approaches.

Several hundred laws and regulations targeting digital platforms, user-generated content,[3] and content moderation[4] have been developed or proposed in recent years, including in Turkey, India, and Singapore and proposals in the United Kingdom, Brazil, and elsewhere. Similarly, dozens of jurisdictions have proposed, are considering, or have passed AI-focused regulations in recent years. This trend is only expected to accelerate with increasing attention on generative AI.[5] While Roundtable members are focused on a multitude of emerging regulations related to digital platforms and AI, Article One's conversations with companies largely focused on two emergent digital rights regulations in Europe: the DSA and the EU AI Act. Many expect these

regulations to set the global standard for digital platforms and AI, with the 'Brussels effect' diffusing these regulations around the world.[6]

The **Digital Services Act** (DSA) entered into force in late 2022 and introduces new and extensive obligations for online services in the European Union. The DSA was years in the making and has two primary goals:

- Protecting the fundamental rights of users of digital services in the EU, and

- Establishing a more level playing field for online services in the EU.

The DSA builds on human rights frameworks and staff from the European Commission involved in drafting the DSA have stated that the UNGPs informed their strategy.[8] However, the DSA introduces a range of requirements that pivot away from the approaches of the UNGPs, including the introduction of new forms of assessment (e.g., the DSA's systemic risk assessment and audits for very large online platforms and search engines) as well

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[3] Digital Policy Alert, https://digitalpolicyalert.org/activity-tracker?offset=0&limit=10&period=2020-01-01,2023-09-08.
[4] Digital Policy Alert, https://digitalpolicyalert.org/dynamics?period=2020-01-01,2023-09-08.
[5] IAPP Governance Center, https://iapp.org/media/pdf/resource_center/global_ai_legislation_tracker.pdf.
[6] See, for example, Centre for the Governance of AI (2022), https://www.governance.ai/research-paper/brussels-effect-ai.
[7] Digital Services Act: EU's landmark rules for online platforms enter into force (2022), https://ec.europa.eu/commission/presscorner/detail/en/IP_22_6906.
[8] See statement from Diana Vlad Calcic, European Commission, that the "thinking behind the drafting process of the European Union's Digital Services Act … was informed by the UNGPs." https://www.ohchr.org/sites/default/files/2022-02/B-Tech_BHR_Forum_Building_Blocks.pdf.

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as the apparent prioritization of some fundamental rights over others.[9] In other areas, the DSA introduces specific requirements for identified risks, including mis- and dis-information, gender-based abuse, and other harmful purposes.

The proposed **EU AI Act** is expected to introduce requirements for companies that develop and deploy AI within the EU market. The AI Act entered the 'trilogue' negotiation period where the European Commission, Council, and Parliament will negotiate a final text. Stakeholders expect a political agreement on the AI Act by the end of 2023, with the Act entering into force in 2025 or 2026.[10] The AI Act is grounded in fundamental rights and EU legislation on data protection, consumer protection, and gender equality. The Act will likely prohibit "unacceptable risk" AI systems, including social scoring, "real time" biometric identification, predictive policing, and certain applications of emotion recognition. It will likely classify other AI uses based on risk, including proposed "high-risk" AI that currently includes biometric identification, management of critical infrastructure, migration, and border control. Systems deemed to be high risk will require management systems that include:

- Identification and analysis of the known and foreseeable risks associated with each system, and

- Evaluation of the risks that may emerge when the AI system is used in accordance with its intended purpose as well as conditions of reasonably foreseeable misuse.

While the AI Act can be seen as introducing elements of human rights due diligence, the current drafts of the Act have been criticized for failing to center human rights.[11] The Investors Alliance for Human Rights, for example, has urged regulators to incorporate meaningful human rights impact assessment (HRIA) requirements for developing and deploying AI systems alongside proposed risk management systems.[12]

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[9] See CDT & GNI, How can we apply human rights due diligence standards to content moderation? (2021), https://globalnetworkinitiative.org/wp-content/uploads/2021/09/CDT-GNI-DSA-Due-Dilligence-July-29.pdf.

[10] See IAPP, Contentious areas in the EU AI Act trilogues (2023), https://iapp.org/news/a/contentious-areas-in-the-eu-ai-act-trilogues/.

[11] EU Trilogues: The AI Act must protect people's rights A civil society statement on fundamental rights in the EU Artificial Intelligence Act (2023), https://edri.org/wp-content/uploads/2023/07/Civil-society-AI-Act-trilogues-statement.pdf.

[12] Investors Alliance for Human Rights, Investor Statement in Support of Digital Rights Regulations: European Union Artificial Intelligence Act (2023), https://investorsforhumanrights.org/investor-statement-support-digital-rights-regulations-european-union-artificial-intelligence-act.

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Article One's interviews with company teams working on human rights revealed both challenges and opportunities prompted by regulation impacting the ICT sector. While this evolving landscape presents significant opportunities to advance human rights, it also introduces new uncertainty and necessitates new strategies. This section explores these challenges and opportunities.

CENTERING HUMAN RIGHTS IN REGULATION

The Challenge: How can companies embed human rights in regulatory compliance strategies?

While European lawmakers describe the protection of fundamental human rights as a primary motivation for digital platform and AI regulation, company interviewees described uncertainty around the extent to which regulators would build on and reinforce existing human rights methodologies, including the UNGPs. These challenges are mirrored within companies, and several interviewees suggested that translating human rights-based approaches to internal teams and decision-makers working on regulatory compliance has been an ongoing challenge. While new regulations like the DSA and AI Act, as well as mandatory human rights due diligence, present new opportunities to elevate human rights decision-making, internal teams are working to show how human rights are relevant.

Regulators will ultimately play a key role in determining the extent to which human rights frameworks are incorporated into DSA and AI Act compliance. One company representative navigating the early stages of DSA compliance, for example, stated "we are now at the mercy of EU regulators to see if our approach is what they wanted. If they go a different direction from the UNGPs, I am not sure the human rights framing will continue to be useful" in their approach to the DSA. These perspectives were echoed by another company representative navigating the DSA, stating "so much of our UNGP-aligned work depends on how the regulators will respond. Without the regulators in Europe referencing human rights, there won't be a virtuous cycle" emerging from the DSA. This interviewee summed up their sense of uncertainty, stating "ultimately, it is unclear how much the UNGPs will be relevant. The jury is out."

The Opportunity: Company human rights strategies can promote a UNGP-aligned approach to human rights that promotes consistency and efficiency in regulatory compliance.

Some teams are successfully leveraging the UNGPs and company commitments to international standards to advance a principled, globally consistent approach to compliance. We heard from multiple interviewees that companies with UNGP-aligned human rights programs are in a strong position to comply with, and exceed, emerging platform and AI regulations. For companies in the process of formalizing human rights programs, several suggested that articulating human rights strategies could make them better prepared for technology regulation. We heard from one company representative that an existing human rights working group was serving as a foundational forum to discuss regulatory expectations and build rights-advancing compliance strategies. We heard from another interviewee that several years of work to build an ethical AI program informed by the UNGPs gave the company confidence that "the core pieces of the AI Act would be covered by our existing approach." Multiple interviewees described the UNGPs and international human rights standards as an important, and even foundational, frameworks for companies to navigate competing and potentially divergent regulatory demands.

STRENGTHENING HUMAN RIGHTS LEADERSHIP AND RESOURCING

The Challenge: How can companies best prioritize human rights amid constrained resources?

Multiple interviewees described how digital platform and AI regulation was introducing new expectations for human rights, legal and compliance, and trust and safety teams. Some questioned whether compliance was diverting attention from human rights teams. Indeed, we heard examples of human rights teams having to advance strategies with less attention and fewer resources while a focus on regulatory compliance increased. Several interviewees also noted challenges in connecting existing human rights work to company compliance strategies. One interviewee, for example, shared that new "compliance and administrative burdens risk detracting from the actual mission of our human rights team," thereby deprioritizing a focus on salient risks. Another interviewee shared that new regulation risked narrowing a company's commitment to human rights and diverting resources, stating that "before regulation, we were able to say we have to do this under our commitment to the UNGPs. Now with regulations, some in leadership are saying we can put this specific priority off for a while since it is not required by specific regulation."

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The Opportunity: New regulation can help to increase leadership focus on human rights.

Our interviews suggested that ICT regulations can offer concrete opportunities to increase leadership focus on human rights and the value of corporate human rights strategies. Heightening regulatory expectations are also serving to reinforce the importance of human rights teams within companies and strengthen their recommendations at the highest levels of the company. One interviewee stated that technology regulation serves to "legitimize some of the recommendations we are making because human rights is a very new conversation for our leadership team." Another interviewee described regulations as a "stick," alongside the more normative carrot of UNGP alignment: "Regulations are more of the stick that will get us to move more quickly with leadership … regulation is the reason why we are increasing our focus on digital rights and downstream issues." Educating leadership on human rights and how a company's human rights strategy can respond to emerging regulatory expectations is seen as an important opportunity for impact.

Technology regulation in Europe can help elevate human rights with leadership, even while in the drafting phase or when companies are not in scope for a specific regulation. Nearly all interviewees reported they were following the DSA and/or AI Act processes closely, regardless of whether the company was expected to be in scope. Interviewees pointed to the expected

normative impact of European digital platform and AI regulation, or the 'Brussels effect.' One interviewee stressed that regulatory debate served as an important data point for emerging expectations. This interviewee suggested that: "regulatory conversations have been very instructive for our team as a barometer of where European policymakers and civil society organizations are focusing and where they see significant risk in AI." This was echoed by representatives from another company that likely will not be directly in scope for European technology regulation: "Even if we're not in scope for the EU AI Act, we have started beefing up our governance, as well as articulation and transparency around AI and responsible AI" due to the regulation.

CREATE MEANINGFUL PARTNERSHIPS FOR HUMAN RIGHTS

The Challenge: How can human rights teams reinforce commitment and cross-functional collaboration for human rights amid new regulatory expectations?

More than half of our interviewees referenced the creation of new company processes and partnerships to navigate evolving regulatory expectations when it comes to the DSA and AI Act. Some shared that the emergence of new teams and processes for compliance has on occasion raised challenges, with new teams and functions driving interpretation of regulation and strategies for compliance. Amid these shifts, one interviewee suggested that

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human rights were being "deemphasized" in broader ESG frameworks and processes. Several company representatives stated that it was, at times, difficult to show how existing human rights work catalyzed by the company's UNGP commitments was relevant in the new world of technology regulation. One company representative stated that regulation was "an entry point for greater relevance, but not an easy one." Another stated bluntly that "I have not met a regulatory or compliance lawyer who has heard of the UNGPs."

Some of these challenges extend to the role of external advisors in regulatory compliance. Most companies rely on outside counsel as well as consultancies to understand regulation and build strategies for compliance. Several interviewees highlighted challenges associated with an over-reliance on outsourced vendors with uneven human rights expertise. Reliance on such external advisors may heighten the risk that compliance turns into a "check the box exercise." Another interviewee suggested that the big vendors that play a central role in DSA compliance for very large platforms and search engines did not have sufficient expertise – or even interest – in human rights.

The Opportunity: New cross-functional partnerships are necessary for effective compliance and present an opportunity to engage more teams on human rights.

Our interviews revealed that multiple teams have leveraged regulatory expectations to proactively position human rights as a central theme that is vital for compliance. For some companies, we heard of longstanding partnership efforts and effective coordination of human rights through human rights committees that reach multiple parts of the company. Within existing human rights governance structures, we heard examples of positive engagement, with new internal stakeholders and teams coming to the table to learn about company human rights strategies and embedding them in corporate approaches to regulation. One interviewee said that new regulations, including mandatory human rights due diligence, require broader efforts to bring in new teams and functions: "We are now engaging stakeholders who have not been central partners for our human rights work in the past. These have not been critical internal stakeholders and now we are working to address an education gap of what we bring to the table and how human rights are relevant to compliance."

We heard examples of concrete strategies to improve internal communication and partnership. Some teams are holding weekly regulation-focused meetings "to make sure the necessary functions are talking to each other and there's a regulatory strategy" that accounts for human rights. Others are doubling down on existing forums for human rights, like human rights committees and working groups. In each case, teams traditionally focused on human rights issues (including human rights teams, legal, trust and safety, public policy, supply chain, and CTOs, among others) are now forging new relationships with data governance, data science, compliance, finance, and accounting, and the broader range of teams who play a role in determining company compliance.

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ADVANCING A COMPANY-WIDE APPROACH TO HUMAN RIGHTS

The Challenge: How can human rights teams leverage regulation to broadly engage staff on human rights?

Several interviewees expressed concern that an increased internal focus on regulatory compliance may decrease the importance of a human rights framing. One interviewee suggested that "too many cooks in the kitchen" – or an uncoordinated approach to human rights – could lead to a loss of focus on the UNGPs, especially for the internal teams who are not familiar with that framework. We heard from multiple interviewees that the teams responsible for elements of compliance interpretation and implementation (e.g., legal, product) may lack familiarity with the UNGPs. Inefficiencies are then created as new teams build new strategies for regulatory compliance that do not leverage existing processes and expertise.

The Opportunity: Regulation can catalyze human rights training to strengthen awareness and responsibility for advancing human rights.

Our interviews suggest that regulations can unlock new opportunities to extend human rights outreach and training within companies. While some modern slavery regulations require broad employee training on modern slavery risks, some companies are

extending human rights training to cover a wider range of themes and topics, even without explicit requirements. One interviewee stated that regulations have started to strengthen internal human rights awareness. Staff across the company are beginning to see "that every job is a human rights job, everyone needs training, and everyone has to issue spot." Another interviewee stressed the importance of training, both of the board and leadership team but also broader staff, stating "we're on a journey of educating stakeholders on what rights-advancing compliance means." This journey will require an ongoing commitment to helping internal stakeholders understand that "mere compliance" in the years ahead may look like "a best-in-class human rights program" from a few years ago. Some teams are setting specific goals to increase familiarity and strengthen human rights considerations in new technologies. One interviewee, for example, discussed efforts to expand responsible AI in the lead up to the AI Act, stating "our goal is to have 50% of company engage with our responsible AI training material this year. There should be a base level of comfort in the company if we embrace those tools."

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NAVIGATING THE UNINTENDED CONSEQUENCES OF REGULATION

The Challenge: How can companies navigate potential unintended consequences of regulation?

We heard from several interviewees that regulation could reduce transparency. One interviewee spoke of the tensions in the supply chain field, where a UNGP-aligned approach would suggest sharing information on human rights challenges identified by due diligence within the supply chain. Amid increasing human rights due diligence expectations, this interviewee suggested that legal and compliance functions might be less likely to sign off on public communication around human rights risks. Another interviewee noted the challenge of navigating transparency in modern slavery statements. They cited a recent example of outside counsel recommending that the company narrow the scope of their statement and eliminate references to specific due diligence findings. Navigating competing demands of transparency and legal risk will be an ongoing conversation within companies and, in the words of one interviewee, "transparency challenges with the new regulations are going to be real."

Others spoke of challenges of specific technology regulations. For example, one interviewee spoke of how the requirements for user notification in the DSA could introduce new human rights risks for user safety in some cases. The DSA requirement for a detailed statement of reasons within a peer-to-peer context, for example,

might result in notice to a bad actor, heightening the risk of online (and offline) harm. Analysis of human rights risks associated with compliance should be a priority as companies navigate new and uncharted platform and AI regulation. One company representative shared their approach to AI and platform regulation as "making sure that how we comply doesn't make any of our users less safe." Another interviewee shared their perspective that technology regulation was "the in-vogue thing to do" and will require nuanced strategies to practically advance human rights and safety in different markets. A staff member of a digital platform was unequivocal about the human rights risks emerging in new regulation: "The DSA is going to be used for censorship" as European governments define illegal content. This is particularly true, the interviewee stated, "with companies that have more automated or heuristic-based processes. … We need to ensure that legal compliance processes account for ways that compliance will be abused."

The Opportunity: Industry leaders have a key role to play in meeting compliance obligations while advancing human rights commitments.

Our interviews underscored that there are no easy solutions to navigating the potential unintended consequences of regulations. The companies we spoke to described how they are working to assess regulation for human rights impacts. Many of these tradeoffs are not unique to a single company and would also

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benefit from a multistakeholder approach to navigating ongoing compliance challenges. One interviewee stated that a significant part of their DSA preparation work includes working with product and safety teams to understand where some of the regulatory requirements may conflict with their company principles on user safety. They then need to make a tough decision on the tradeoffs of complying – or not complying – and educating regulators on how to amend approaches moving forward. We heard a desire to deepen multi-stakeholder approaches to navigate these impacts in the years ahead.

REINFORCING A GLOBAL COMMITMENT TO HUMAN RIGHTS

The Challenge: How can companies ensure a focus on global risks amid national and regional regulation?

Our interviews revealed significant corporate attention on regulation in Europe. Some interviewees expressed concern that centering European regulation could detract from the greatest human rights risks people and communities face around the world. For example, one interviewee mentioned censorship and expression risks arising for digital platforms operating in contexts such as Pakistan, Vietnam, Turkey, and India, among others. Many of these countries are pursuing their own regulation of the technology industry, sometimes in absence of democratic oversight. Within this regulatory landscape, interviewees also

expressed concerns related to policy fragmentation. If companies build narrow compliance strategies to respond to specific regulations, human rights protections for users of digital platforms and AI could be determined by geography – if you live in Europe, your user experience and human rights protections might be completely different than if you live in Ethiopia, Ecuador, or the United Arab Emirates.

The Opportunity: Companies can use regulatory obligations as a floor for human rights due diligence and governance, not a ceiling.

With increasing human rights compliance obligations come new opportunities for industry leadership. Interviewees talked about strategies to instrumentally use technology regulation to continue to raise the bar of human rights due diligence and governance across countries and regions. One member of a human rights team stated "we want to use the regulatory floor to push for best practice across the company. There is so much nuance in this regulation, that we … need to interpret for our company" what this means for human rights leadership. Staff from other companies talked of the importance of using regulation as an opportunity to exceed expectations, for example, stating "Regulation is a floor to further build responsibility."

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EMERGING RECOMMENDATIONS

The next generation of corporate human rights leadership will require navigating new regulatory obligations targeting digital platforms and AI, as well as horizontal human rights due diligence and modern slavery regulation. Our interviews with corporate human rights leaders revealed some uncertainty, questions, and challenges associated with the emergence of these new requirements. However, at the same time, we heard significant optimism and numerous concrete opportunities for companies to mature their approach to human rights by centering human rights in regulatory compliance strategies.

The October 2023 meetings of the Roundtable on Human Rights & AI focused on priorities and strategies for rights-advancing compliance. We discussed how regulation presents opportunities to continue to mature human rights programs and approaches. This included a focus on strategies to:

- Engage company leadership to advance human rights within approaches to regulation relevant for the ICT industry (including digital platforms, AI, and broader human rights due diligence);

- Demonstrate connections between company human rights approaches (for example, due diligence, risk assessments, or human rights impact assessments) and expectations in new ICT regulation;

- Engage cross-functional teams on roadmaps to meet and exceed regulatory requirements for human rights;

- Advance global human rights strategies alongside country-specific regulation; and

- Focus on specific thematic entry points across regulations, including grievance mechanisms and complaints handling requirements or fundamental rights and human rights risk assessment under digital platform regulation.

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ABOUT ARTICLE ONE

Article One is a specialized strategy and management consultancy with expertise in human rights, responsible innovation, and sustainability. We partner with the world's leading companies to drive transformative change that places people at the center of business.

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