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Article One's Approach to Stakeholder Engagement

Service Offering

Consultation and engagement with rightsholders and other stakeholders are critical components of effective human rights and environmental due diligence and are increasingly required under emerging regulations. Article One supports companies in developing effective and regulatory-aligned engagement strategies and conducting engagements.

Why Focus on Stakeholder Engagement?

- **Because it is a core element of a company's responsibility to respect human rights.** Stakeholder engagement is fundamental to effective human rights and environmental due diligence (HREDD), as articulated in the UN Guiding Principles (UNGPs), the OECD Guidelines, and IFC Performance Standards.
- **Because it is an increasingly common legal expectation under emerging due diligence regulations.** New frameworks, including the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD) explicitly recognize engagement with stakeholders as a requirement for meaningful HRDD.

> *In order to gauge human rights risks accurately, business enterprises should seek to understand the concerns of potentially affected stakeholders by consulting them directly."*
>
> - UNGPs, Principle 18

- **Because it builds on existing business practices.** Many companies already engage stakeholders through community consultation, employee engagement, and customer feedback processes; integrating these within a human-rights framework creates coherence and strengthens overall due-diligence systems.
- **Because it leads to better outcomes.** Meaningful engagement enables companies to identify and address human-rights risks early, anticipate operational disruptions, improve decision-

making, reduce litigation and reputational risk, design products and services that are more inclusive, and build trust and legitimacy with affected stakeholders and wider society.

Our Stakeholder Engagement Offering

We support companies to incorporate stakeholder engagement into their human rights and sustainability programs in the following ways:

- **Stakeholder Strategy Development:** We partner with companies to develop and implement stakeholder engagement strategies aligned with international human rights frameworks (UNGPs and OECD Guidelines), as well as emerging regulatory expectations (including CSDDD, CSRD, Digital Services Act, Norwegian Transparency Act), including:
  - **Benchmarking existing approaches** against external standards.
  - **Mapping relevant stakeholders** across a company's value chain.
  - Identifying and prioritizing core stakeholders, including rightsholders, civil society organizations, labor organizations and unions, multilaterals, and governments.
  - **Identifying the most reasonable and appropriate engagement method** for each stakeholder, from monitoring to proactive, direct engagement.
  - **Identifying the relevant stages of human rights and environmental due diligence** at which stakeholder engagement should occur (including risk identification and assessment, the development of preventive and corrective action plans, and remediation) as well as defining clear triggers and decision points for engagement across business processes and product development lifecycles.
  - **Developing digital and continuous engagement platforms**, including integration in pulse surveys, supply chain worker voice tools, and AI-assisted trend and grievance pattern analysis.
  - **Designing Engagement Principles** and formalizing an approach and methodology to conducting ongoing engagements, including cadence, format, safety and human rights defender protection, accessibility and inclusivity, and approaches to reciprocity and closing the feedback loop.
  - **Establishing internal governance systems** to support stakeholder engagement and requests for information from stakeholders.
- **Rightsholder Engagement:** We partner with companies to conduct virtual and in-person engagement with rightsholders across corporate value chains. This includes direct employees and contract workers, supply chain workers, end-users of products, and communities impacted by company value chains. Engagements include focus groups, surveys (using tools such as Kobo Toolbox), and 1:1 interviews. Engagements are designed to build trusting relationships, proactively surface risks for management, and identify solutions tailor made for affected individuals. These engagements are often, but not always, integrated into due diligence activities, such as an HRIA, or double materiality assessments. We support companies to embed rightsholder input into key business decisions, including strategy and policy development, product design and innovation, risk management, and advocacy.

- **Vulnerable Groups Engagement:** Article One has developed a rights-compatible approach to engagement with vulnerable groups including human rights defenders, political dissidents, minors, victims of human rights harms, and ethnic and religious minorities. These engagements are designed, first and foremost, to ensure the protection of rightsholder safety and rely on encrypted technology (such as Signal) and local networks of trusted partners. We also engage vulnerable stakeholders around emerging issues—such as climate justice, just transitions, and future of work—to understand and mitigate workforce, supply chain, and community and impacts related to decarbonization and AI and emerging technology.
- **Sentiment Analysis:** Article One supports companies in conducting sentiment analysis related to key business operations or decisions (e.g. market exit, entry, or expansion). This analysis includes stakeholder mapping, identification of influential community leaders, mapping of conflict actors (if relevant), design and execution of engagements, and synthesis and reporting of engagement findings. We typically use a combination of qualitative tools, including interviews, focus groups, and quantitative surveying techniques.
- **Expert Engagement:** Article One supports companies in engaging directly with expert stakeholders, including legitimate representatives of rightsholders. These engagements take many forms, such as: expert roundtables where we bring together company leaders and external experts to facilitate dialogue; 1:1 interviews to secure expert insight into due diligence activities; and interactive workshops support stakeholders in understanding company limitations and challenges as well as surface potential solutions to human rights and sustainability risks.
- **Engaging in Conflict Affected and High-Risk Areas (CAHRAs):** Article One has designed conflict-sensitive and culturally appropriate engagement strategies to support conflict analysis and heightened human rights due diligence. This includes:
  - **Identifying and mapping stakeholders and the engagement context** to enable safe and meaningful participation, with particular attention to vulnerable and marginalized groups.
  - **Conducting meaningful engagement** with a broad range of affected stakeholders, their legitimate representatives, local and international experts, and public and security actors in line with international standards.
  - **Strengthening grievance mechanisms** to ensure accessibility and credibility in CAHRA settings.
  - **Establishing monitoring and feedback loops** to adapt engagement as conflict dynamics and stakeholder sentiment evolve.
- **Internal Capability Building and Training:** We work with clients to develop internal capabilities around stakeholder engagement, including operationalizing strategies, upskilling internal teams to carry out meaningful stakeholder engagement through shadowing and hands-on training, and developing tailored self-service toolkits, engagement materials, and guidance documents to support ongoing dialogue.
- **Independent Reviews and Engagement Effectiveness Assessments:** Article One conducts independent reviews and effectiveness assessments to identify and close gaps in company

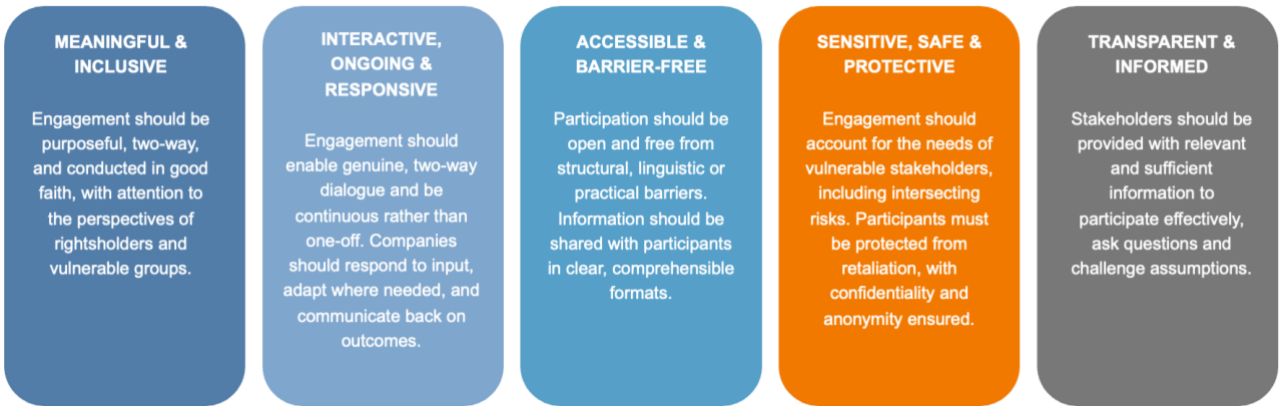
approaches to stakeholder engagement to account for unique operating contexts and the expectations of international standards and regulations. We support clients to develop KPIs for engagement quality, track how engagement influences business decisions, create public transparency metrics, and integrate engagement findings into enhanced grievance mechanism accessibility and rights-compatible escalation and remedy pathways.

- **Reporting and Disclosure**: We support internal reporting and external public disclosure relating to stakeholder engagement, such as summarizing engagement exercises and findings for internal executive audiences, board-level briefings, report-outs to participating stakeholders, and regulatory-aligned public disclosures, including visualizations of company stakeholders across the value chain, engagement methods, and access points.
- **Collaborative Industry Engagement:** We support collaborative stakeholder engagement exercises amongst industry peers in contexts where shared insights are appropriate and support minimizing the burden on at-risk stakeholders.

Article One's Approach to Stakeholder Engagement

We believe that meaningful engagement with rightsholders and stakeholders is central to resilient and sustainable business practice, enabling companies to anticipate risk, design better solutions, make people-centered decisions, and operate with credibility in an environment of rising regulatory and societal expectations.

Article One delivers rights-compatible engagement that is designed to be safe, inclusive, and decision-relevant. As an independent third party, we create trusted channels for candid dialogue while safeguarding confidentiality and minimizing risk to participants—particularly in complex or high-risk environments. Our methodologies are conflict-sensitive, non-extractive, and grounded in reciprocity, ensuring that engagement findings meaningfully inform business strategy, due diligence, remedy, and disclosure. We focus not only on gathering insight, but on strengthening long-term, trust-based relationships that enhance credibility, resilience, and responsible business conduct. Article One's approach to stakeholder engagement is grounded in our Ethical Research and Engagement Principles (see Appendix), and are designed to ensure engagements are:



| APPENDIX

Ethical Research and Engagement Principles

Article One is committed to the highest standards of ethics and integrity in our research and engagement activities, including pursuing meaningful and reciprocal engagement and consultation with stakeholders.

Engaging stakeholders around human rights necessitates attention to any barriers to participation – including age, gender, language, cultural beliefs and norms, among many others. As such, Article One works with local organizations to promote the inclusion of underrepresented voices in our assessments and uplifts and credits the work of others in our research.

In order to ensure we meet these standards and that stakeholders are appropriately informed and protected during any research or engagement activity, we are committed to the following principles:

- Consultations will be carried out with respect for cultural practices, beliefs, and norms of each community or group. Language, literacy levels, security, and digital access issues will be taken into account and engagement will be conducted in a way that aligns with the needs and preferences of participants.
- Transparency is an essential component of meaningful engagement and establishing trust in both directions. We do not conceal the identity of the client for the stakeholder engagement nor the objectives of the engagement.
- Participants should be provided an advance written summary of the project, proposed engagement topics/questions, and expected outcomes in a language and format they can understand.
- We ensure the anonymity of all individual participants by aggregating data and ensuring the final report contains no identifiable information. However, should expert stakeholders (or their organization) wish to be credited and acknowledged for a perspective or recommendation, this will always be offered and honored.
- Engagement is always voluntary. We work with our clients and stakeholders alike to ensure that appropriate consent is provided and that all stakeholders understand the importance of confidentiality and non-retaliation.
- To the greatest extent possible, we seek stakeholders' participation and co-design in the structure and substance of the engagement and strive for non-extractive engagement models. We aim to provide stakeholders with multiple opportunities for input.

- We strive to use our relationships to build trust and create direct channels of communication between stakeholders and clients for mutually beneficial and productive, long-term relationships, where possible.
- To ensure reciprocity and minimize the burden placed on expert stakeholders, we share written summaries of the engagement findings and outcomes on conclusion of the project and direct compensation terms wherever possible. In all forms of engagement, we seek opportunities for reciprocity and closing the feedback loop. Compensation of directly-affected stakeholders is often not appropriate in order to protect the integrity of findings; however, participation in engagement should not compromise stakeholders' access to their standard income or their livelihood. Compensation terms will be reviewed at various points in the engagement process and may change based on the time involved or the number of engagements throughout the project cycle.
- To ensure concerns of bias do not enter the engagement process when offering honorariums, we leverage our position as an independent third party and ask stakeholders to provide open and honest feedback.
- We provide participating stakeholders with contact information in order to share concerns or feedback related to the engagement, including sensitive information, grievances, or to report retribution.

ARTICLE ONE



ABOUT ARTICLE ONE

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