

# Responsible Business Conduct 2024

New regulatory demands set an expectation that institutions and companies acknowledge the human rights impacts of both their own operations and supply chain. Businesses are expected to take steps to proactively identify, mitigate, and prevent negative human rights impacts and outcomes. Key issues include forced and child labour, privacy, freedom of speech, equality, discrimination, and occupational safety, among others.

## WHY HRDD?

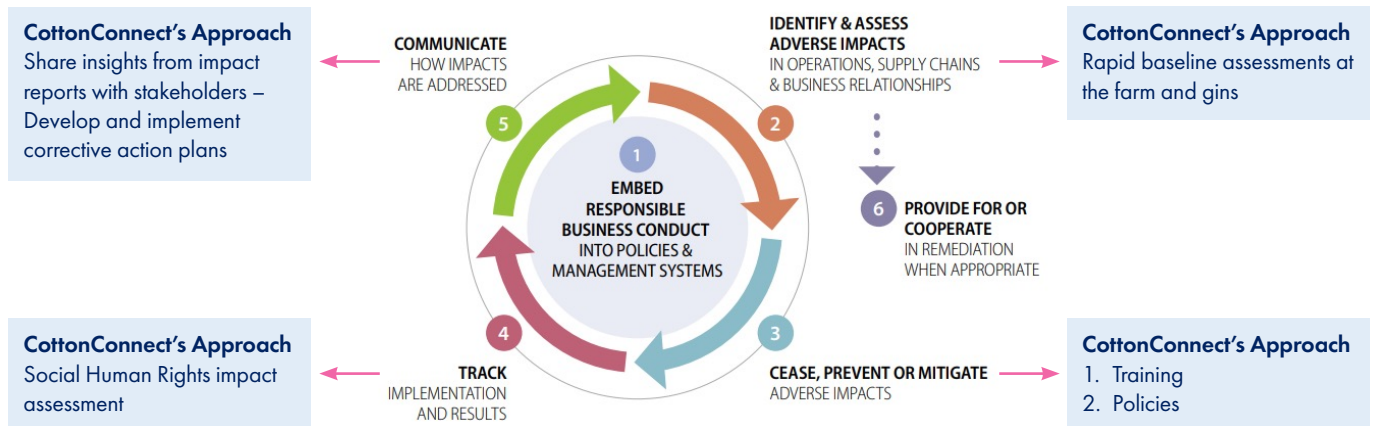
Our purpose is to improve cotton supply chains through improving lives in the communities which we serve. Respecting human rights sits at the heart of what we do and Human Rights Due Diligence (HRDD) is the process we use to embed them into our business. HRDD enables:

- A safe workspace for employees, local partners, and other stakeholders.
- A framework to identify risks and adverse impacts
- Long term and sustainable relationships with stakeholders
- Increased awareness of human rights and how they are implemented

## HUMAN RIGHTS DUE DILIGENCE (HRDD) PROCESS

Following the recommendations in the UN Guiding Principles on Business and Human Rights and in the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, CottonConnect has created its HRDD process.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Source: The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

## IMPLEMENTING HRDD

We work closely with our cotton communities and wider stakeholders to better understand and identify any human rights issues. Steps we have taken include:

Conducting a full review of our human rights programme and publishing a **Global Human Rights Policy**. The CottonConnect **Human Rights Due Diligence** framework is based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Working with a continuous improvement approach, we have raised awareness and reviewed our decent work standards in line with the OECD Guidelines.

Working with the human rights and business consultancy **twentyfifty** to embed human rights into our business.

Strengthening our HRDD implementation to translate global frameworks and best practices at a farm and gin level with experts through:

- **Rapid Baseline Assessments** at the farms and gins;
- Creating a robust response framework in case actions are required, including the appointment of a **Child Protection Officer**
- Rolling out a **Speak Up Campaign** internally and with implementing partners
- Reviewing our grievance policy and grievance mechanism
- Developing **customised training methodology** keeping in mind geography-specific external challenges

## RAISING AWARENESS OF OUR GRIEVANCE MECHANISM

- Speak Up Campaign  
**See it, Report it, Stop it...**



- Grievance helpline: Grievances can be raised directly by sending an email to **[grievancesandcomplaints@cottonconnect.org](mailto:grievancesandcomplaints@cottonconnect.org)**
- Direct phone call or WhatsApp: Stakeholders can call or WhatsApp **WhatsApp at +91 9311837233 (India)**

**Insights:** As part of the review of our Grievance Mechanism we held two Focus Group Discussions on Grievance Mechanism Knowledge and Awareness on Grievance Mechanism (Speak Up Campaign) in India, Pakistan and Bangladesh

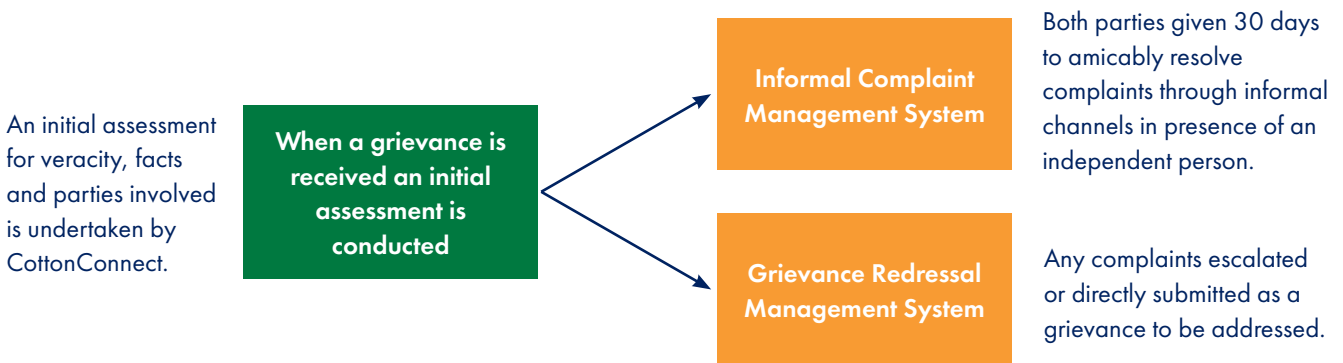
Number of participants: 20 women + 40 men farmers  
20 women + 50 men farm workers

### FINDINGS

- **Women not aware** of Grievance Mechanisms, have shown curiosity and interest to learn and accept such a system.
- Women participants shared that they **did not have separate phones** – depended on husbands, or older children, even for personal calls.
- They were **not aware of what a grievance meant** – felt it was a way of life.

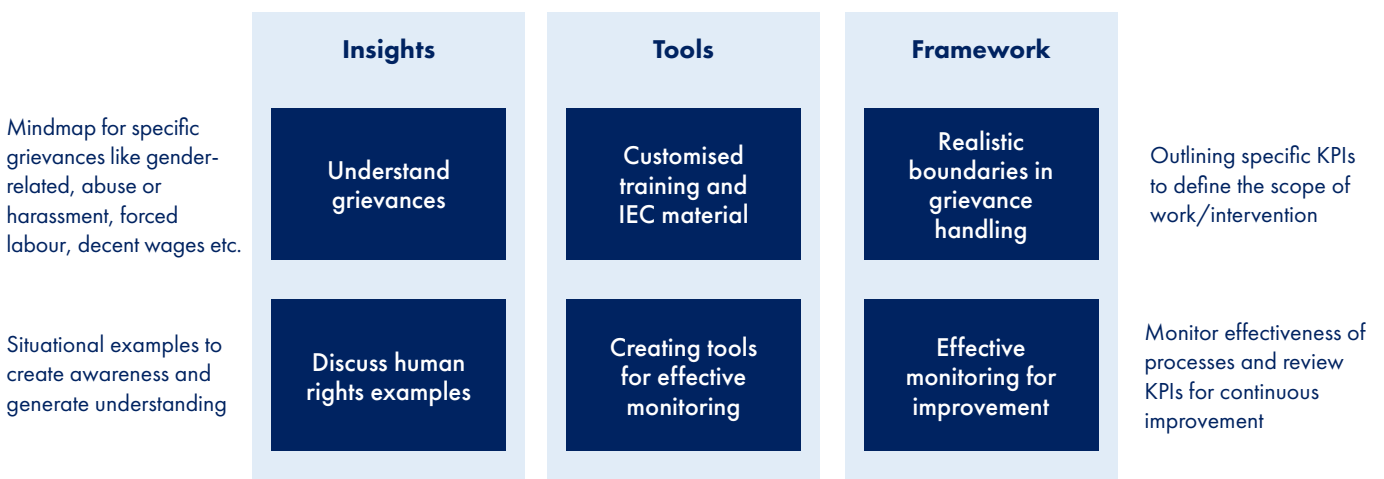
## COMPLAINTS AND GRIEVANCE REDRESSAL SYSTEMS

An informal complaint or grievance are both forms of expressing dissatisfaction within the workplace, but they differ in their formality, scope and redressal. Below is a description of how they are managed.



**Modes of filing complaint:** CottonConnect website, letter/courier, direct email, phone or WhatsApp at +91 9311837233

## ESTABLISHING GM FRAMEWORK AT THE FARMS AND GINS



**Next steps:** We will continue to review our frameworks to ensure they align with the new legislations.