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POLICY PAPER
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Roadmap for Business and Human Rights in the Eastern Partnership (EaP) region

Armenia, Azerbaijan, Georgia, Moldova, and Ukraine

Purpose and Structure of the Roadmap

To foster a resilient and competitive business environment where EaP countries act as reliable partners in EU value chains there is a need to institutionalize human rights due diligence, transparency, and sustainable corporate governance. To do so, companies must first address a series of regional challenges.

In the first chapter (I), this Roadmap gives an overview of the State of the Art in the EaP Region, to then outline a (II) Strategic Vision with some key challenges that the region faces to ensure better human rights compliance and sustainable corporate governance. From the Strategic Vision, the text outlines a Roadmap based on the three Pillars in the UNGPs – Pillar 1: The State Duty to Protect (Policy, Regulation, and Oversight); Pillar 2: Corporate Responsibility to Respect (Private Sector Operations); and Pillar 3: Access to Remedy (Accountability & Redress).

Taken together, this roadmap document outlines the operational context and BHR-challenges, a strategic vision and a roadmap with recommended steps that companies and states should adopt to ensure resilience, sustainability, reliability and transparency. These steps can both be a competitive advantage for the EaP region and a core of the value proposition to the EU. In many cases, human rights and sustainability compliance is also increasingly legally required in the EU market, which makes sustainable firms and states stay ahead of the curve.

SWEDWATCH
FAU Friedrich-Alexander-Universität Erlangen-Nürnberg
UN Global Compact Network Georgia
IBDOM-MIBHR Institutul pentru Business și Drepturile Omului din Moldova Moldovan Institute for Business and Human Rights
Östgruppen

The Landscape: State of the Art in the EaP Region

The implementation of Business and Human Rights (BHR) standards across the Eastern Partnership (EaP) region has entered a transformative phase. The historical reliance on voluntary corporate social responsibility is being replaced by a mandatory compliance environment, driven primarily by the EU Corporate Sustainability Due Diligence Directive (CSDDD)[1] and the Corporate Sustainability Reporting Directive (CSRD)[2]. These regulations have established a new baseline for market participation, where Human Rights Due Diligence (HRDD) is no longer a peripheral consideration but a core requirement for integration into European value chains.

The region continues to face an institutional maturity gap, as identified in the 2023 UNDP Scoping Study The Status of the Implementation of the UNGPs on Business and Human Rights in Europe and Central Asia[3]. While national legal frameworks in Ukraine and Moldova are increasingly approximating the EU acquis, the practical application of the State Duty to Protect remains uneven. The 2023 UNDP Scoping Study identifies significant gaps in BHR and RBC awareness and implementation across the South Caucasus and Eastern Europe, including limited uptake of human rights due diligence. Building on these findings, this Roadmap identifies a persistent conceptual gap between traditional Corporate Social Responsibility (CSR) approaches—sometimes focused primarily on philanthropic or community initiatives—and the risk-based management approach required by BHR.[4] Transitioning from this legacy model toward the Corporate Responsibility to Respect requires a fundamental shift in corporate governance, moving from narrative-driven reporting to the provision of verifiable, European Sustainability Reporting Standards (ESRS)-aligned data[5].

The operating environment is further complicated by the state-business nexus. Across the region, significant state ownership and concentrated economic structures are accompanied in some contexts by weaknesses in transparency, accountability and effective oversight of State-Owned Enterprises (SOEs).[6] Furthermore, the ongoing war in Ukraine reinforces the need for heightened Human Rights Due Diligence (hHRDD). Businesses operating in or connected to conflict-affected areas are expected to apply heightened due diligence in order to identify and address heightened risks to human rights and conflict, including risks of involvement in severe human rights abuses and violations of International Humanitarian Law (IHL).[7] Such risk-management systems are also increasingly relevant to international financing and political-risk guarantees, where environmental, social and human-rights due diligence forms part of project assessment.

While the United Nations Guiding Principles on Business and Human Rights (UNGPs)[8] is the authoritative and universal framework for business and human rights, and form the basis for concepts of Responsible Business Conduct (RBC) in the OECD Guidelines for Multinational Enterprises, the translation into implementation varies geographically. This roadmap provides a technical and strategic framework to close the implementation gap in the EaP Region. By centering on the three pillars of the UNGPs – Protect, Respect, and Remedy – it outlines the steps necessary to institutionalize HRDD, improve policy coherence, and ensure that rights-holders have access to effective judicial and non-judicial grievance mechanisms. The objective is to foster a resilient business environment where EaP enterprises operate as transparent and accountable partners within the global economy.

1. The "CSR vs. BHR" Paradigm Gap: From Voluntarism to Mandatory HRDD

The 2023 UNDP Scoping Study The Status of the Implementation of the UNGPs on Business and Human Rights in Europe and Central Asia[9] confirmed that the region remains "stuck in transition", specifically regarding the conceptual shift from philanthropy to risk management.

In EaP countries, the "State of the Art" is still dominated by the Corporate Social Responsibility (CSR) model. Businesses report on charitable donations to veteran funds or local schools as a substitute for investigating labor abuses in their own supply chains.

2. The State-Business Nexus: The "SOE Transparency Vacuum"

In Ukraine and Moldova, State-Owned Enterprises (SOEs) continue to play an important role in strategically significant sectors, while governance, transparency and accountability challenges remain. In Ukraine, the 2023 UNDP Scoping Study identifies a substantial SOE presence in sectors including energy and infrastructure and points to continuing governance and transparency concerns, particularly among municipally owned enterprises.[10] Similar concerns regarding the transparency and accountability of SOE governance have also been documented in Moldova.[11]

The 2024 Freedom House "Nations in Transit"[12] report notes that while "old-school" oligarchs are being challenged in Ukraine, new "wartime elites" are emerging. These structures are fundamentally incompatible with BHR because they thrive on asymmetric information and the suppression of labor unions – the very stakeholders HRDD is designed to empower.

3. The Remedy Crisis: "Telephone Justice" and OECD Dormancy

Access to remedy remains the weakest link across the EaP. The 2024 World Justice Project Rule of Law Index[13] shows that judicial independence in the South Caucasus remains fragile. The term "Telephone Justice" persists, describing a system where corporate-state interests override the rights of vulnerable communities in land and environmental disputes.

While the OECD Guidelines for MNEs[14] were updated in 2023 to include stronger environmental and digital standards, National Contact Points (NCPs) in the region remain largely dormant or underfunded. In Ukraine, the NCP has been "rebooted" as part of the reconstruction strategy, but in Georgia and Azerbaijan, the lack of awareness among rights-holders means these pathways are effectively invisible to those who need them most.

4. The War in Ukraine: Forced Maturity of hHRDD

The Russian invasion has fundamentally changed the context in which businesses in Ukraine operate and has heightened the human rights risks associated with business activities. UNDP's 2023 Responsible Business Conduct During War in Ukraine: Context Assessment Study documents the challenges faced by businesses in adapting their human rights policies and practices to wartime conditions.[15] In conflict-affected contexts, businesses are expected to undertake heightened human rights due diligence (hHRDD), assessing not only their impacts on human rights but also the interaction between their activities and conflict dynamics.[16]

Strategic vision

This Roadmap develops a line of argument on how EaP countries act as reliable partners in EU value chains to increase sustainability and competitiveness and EU integration on the EU market. It does so by using a framework of three types of Challenges with proposed steps towards enhanced human rights due diligence, transparency, and sustainable corporate governance.

In this Roadmap, resilience in the EaP is understood as the ability of businesses to withstand and adapt to three types of challenges:

Launched in 2009, the Eastern Partnership (EaP) brings together the EU, its Member States and five Eastern European partners: Armenia, Azerbaijan, Georgia, Moldova and Ukraine, supporting their path towards EU integration.

Challenge 1: Geopolitical Resilience & Heightened Due Diligence

A. Defining Heightened Human Rights Due Diligence (hHRDD)

In Conflict-Affected and High-Risk Areas (CAHRAs) – such as Ukraine or border regions in the South Caucasus – the due diligence standard are "Heightened." This means businesses must apply a "Conflict Lens" to decisions, to understand how they impact human rights and conflict dynamics.[17] hHRDD requires identifying not only how the business affects people and human rights but also how the conflict affects the business's impact on people, as well as how business activities impacts conflict dynamics. It is a dynamic, continuous process that recognises that in a conflict, there is no "neutral" business activity; every transaction either can either contribute to stability or exacerbate the crisis.[18]

B. Demonstrating Non-Complicity

Under the UN Guiding Principles on Business and Human Rights, companies should assess the nature of their involvement in adverse human rights impacts by determining whether they cause, contribute to, or are directly linked to such impacts through their business relationships.[19]

- **Causing an adverse impact:** where a company's own activities are sufficient to result in an adverse human rights impact.
- **Contributing to an adverse impact:** where a company's activities, together with the activities of another actor, contribute to an adverse human rights impact, or where the company facilitates or incentivizes another actor to cause such an impact.
- **Direct linkage:** where an adverse human rights impact is directly linked to a company's operations, products or services through a business relationship, even where the company has not itself caused or contributed to the impact.

In conflict-affected contexts, heightened human rights due diligence should therefore assess how a company may cause or contribute to adverse impacts, as well as impacts that may be directly linked to its operations, products or services through business relationships.

C. Regional Application: Ukraine

hHRDD in Ukraine is the cornerstone of "Integrity in Reconstruction." In this Roadmap, hHRDD is considered a core element of integrity in reconstruction. This approach reflects the growing emphasis on conflict-sensitive responsible business conduct in Ukraine's recovery, including the application of heightened human rights due diligence to ensure that business activities do not contribute to human rights harms or exacerbate conflict dynamics.[20]

For businesses operating in Ukraine, hHRDD should identify and assess the human rights risks that are heightened or transformed by the conflict. The specific risks will depend on the company's sector, location, workforce, operations and business relationships, but may include:

- **Worker health, safety and security:** heightened risks to life and physical and mental health arising from missile attacks, mines, damaged infrastructure, unsafe workplaces, evacuation needs and inadequate access to shelters or emergency procedures.

- **Labour rights and decent working conditions:** risks relating to wages and working time, suspension or termination of employment, unpaid leave, informal employment, occupational safety, freedom of association and collective bargaining, particularly where wartime measures increase workers' vulnerability.

- **Discrimination and impacts on vulnerable groups:** heightened risks affecting internally displaced persons, persons with disabilities, women and persons with caring responsibilities, older workers and other groups that may face barriers to employment, evacuation, workplace safety or access to essential services.

- **Operations and business relationships in conflict-affected areas:** risks that a company may cause, contribute to, or be directly linked to serious human rights abuses or violations of international humanitarian law through its own activities, suppliers, contractors, customers or other business relationships.

- **Security arrangements:** risks associated with the use of public or private security actors, including the possibility that security arrangements may adversely affect employees or local communities.

- **Access to essential goods and services and consumer rights:** risks relating to the availability, accessibility, affordability and non-discriminatory provision of essential goods and services, including energy, water, food, healthcare, transport, communications and financial services.

- **Displacement, land, housing and property:** risks associated with forced displacement, occupation or destruction of property, contested ownership and the use of land or assets in areas affected by hostilities, particularly in reconstruction activities.

- **Responsible relocation, exit and return:** adverse impacts on workers, communities, suppliers and other rights-holders when companies relocate, suspend operations, leave conflict-affected areas or return to areas where control has been restored.

- **Community impacts and conflict sensitivity:** risks that business decisions regarding employment, procurement, investment, infrastructure or distribution of resources may exacerbate existing grievances, inequalities or conflict dynamics.

- **Access to remedy:** heightened barriers preventing workers, communities and other affected rights-holders from raising concerns and obtaining effective remedy during conflict.

D. Regional Application: South Caucasus

In the South Caucasus, this Roadmap applies hHRDD particularly to infrastructure and other business activities that may interact with conflict dynamics, contested territories, displacement, land rights and relations between affected communities. In line with UNDP guidance on hHRDD, companies should assess not only adverse human rights impacts but also whether their operations, products, services or business relationships may exacerbate existing tensions or contribute to new conflict dynamics.[21]

For businesses operating in conflict-affected or conflict-sensitive contexts in the South Caucasus, hHRDD should examine how business activities and relationships interact with existing human rights risks, grievances and conflict dynamics. Relevant risk areas may include:

- **Infrastructure, land and community impacts:** Major transport, energy and other infrastructure projects may affect land and property rights, livelihoods, access to resources and relations between communities. Companies should assess whether project siting, land acquisition, procurement or consultation processes could disproportionately affect vulnerable or conflict-affected groups or exacerbate existing grievances.

- **Security and human rights:** Businesses operating in areas affected by insecurity, contested boundaries or heightened tensions should assess human rights risks associated with public and private security arrangements. Where relevant, the Voluntary Principles on Security and Human Rights provide a useful framework for assessing and mitigating security-related human rights risks, including through risk assessment, community engagement and engagement with public and private security providers.[22]

- **Non-discrimination and conflict-sensitive employment:** Companies should ensure that recruitment, employment conditions, procurement and other business practices do not discriminate on prohibited grounds, including race, ethnicity or national origin. In conflict-affected settings, hHRDD should additionally consider whether employment and procurement decisions may reinforce existing divisions, perceptions of exclusion or other conflict-related grievances.[23]

These issues should be assessed in light of the specific sector, geographic area and conflict dynamics rather than treated as uniform risks across Armenia, Azerbaijan and Georgia.

E. The «Grey Zone» Challenge (Moldova & Transnistria)

Many businesses in the Transnistrian region export to the EU under Moldova's Deep and Comprehensive Free Trade Area (DCFTA). However, because the Moldovan constitutional authorities do not exercise effective control over the territory, significant gaps remain in the monitoring, verification and assessment of business-related human rights risks and impacts.

The 2025 National Baseline Assessment on Business and Human Rights in Moldova identifies a regulatory and human rights protection vacuum in the region and highlights risks relating to workers' rights, freedom of association, occupational safety, discrimination, access to remedy and non-transparent economic structures. National authorities are also unable to conduct effective labour inspections or independently verify corporate practices in the territory.[24]

Businesses operating in, sourcing from, or otherwise connected to the Transnistrian region should therefore apply enhanced, context-sensitive human rights due diligence to identify and address heightened risks, including labour exploitation and forced labour, discrimination, restrictions on trade union rights, unsafe working conditions and barriers to effective remedy. Where relevant, businesses should also assess whether their activities or business relationships may cause, contribute to, or be directly linked to abuses occurring in this conflict-affected context.[25]

The 2025 National Baseline Assessment notes that companies operating in the Transnistrian region face an environment influenced by actors with non-transparent politico-economic interests, citing the Sheriff Group as an example.[26] In conducting hHRDD, businesses operating in or connected to the region should therefore assess their business relationships and consider whether they may cause, contribute to, or be directly linked to adverse human rights impacts through those relationships. Where relevant, this should be complemented by sanctions and integrity due diligence, including

verification of ownership and control structures and screening of business partners and beneficial owners against applicable sanctions.

Given Transnistria's historical and military ties to Russia, the region is a high-risk zone for the diversion of Western technology or the "re-labeling" of sanctioned goods. Businesses operating in or trading through the Transnistrian region should assess sanctions-circumvention risks as part of their broader compliance and integrity due diligence. Where goods or technologies are subject to EU export restrictions, relevant operators may need to verify customers, intermediaries, transport routes and end users and implement proportionate controls to reduce the risk that goods are diverted or re-exported to Russia in breach of applicable sanctions.[27]

In Transnistria, independent trade unions are non-existent, and the right to strike is severely restricted.

According to the UNGPs, companies have a responsibility to respect human rights also in absence of the State's ability to ensure its own duty to protect.[28] In other words, even when the Moldovan state cannot guarantee labor rights in the region, business actors must respect of human rights. Companies must establish independent, third-party monitored grievance mechanisms and conduct "off-site" interviews with workers to ensure they are not being exploited or intimidated.

F. Strategic Outcome for the Roadmap

In this Roadmap, institutionalizing hHRDD is considered a means through which the EaP region can move from a high-risk operating environment toward one in which heightened risks are more systematically identified, managed and mitigated.

- **For the Company:** Managing Legal Risk. Effective hHRDD can help companies identify and prevent involvement in serious human rights abuses and demonstrate that they took reasonable steps to avoid causing or contributing to such harms. This may reduce legal risk, including risks associated with alleged corporate involvement in international crimes. However, conducting hHRDD does not in itself provide immunity from civil or criminal liability.[29]

- **For the Investor:** Strengthening Environmental and Social Risk Management. Effective hHRDD can provide investors and financial institutions with better information on human rights and conflict-related risks and demonstrate that companies have systems in place to identify, prevent and mitigate adverse impacts. This can support alignment with the environmental and social due diligence requirements applied by international financial institutions and other responsible investors.

- **For the Region:** By integrating conflict sensitivity and hHRDD into business activity, economic development can contribute to greater stability rather than exacerbate existing grievances or conflict dynamics. Responsible investment and business conduct can, in this way, support the conditions for a broader peace dividend.

- **For Market Competitiveness** Effective hHRDD can strengthen the credibility of EaP companies as business partners by demonstrating that they have systems in place to identify and address heightened human rights and conflict-related risks. This may help companies respond to the due diligence expectations of EU buyers and other international business partners and reduce the risk that concerns about human rights impacts become a barrier to commercial relationships.

- **For Financial Access:** Effective hHRDD can strengthen a company's ability to identify and manage human rights, environmental and conflict-related risks and thereby support its readiness to meet the environmental and social requirements applied by international financial institutions and other responsible investors. This is particularly relevant in Ukraine, where the Ukraine Investment Framework under the EU's Ukraine Facility seeks to mobilise public and private investment through guarantees, grants and financing delivered in cooperation with international financial institutions.

- **For State Integration:** Fast-tracking EU Accession. For EU candidate countries in the EaP, stronger implementation of BHR and human rights due diligence can contribute to broader alignment with EU standards on fundamental rights, corporate governance, labour protection and responsible business conduct. Such reforms may support implementation of obligations relevant to the EU accession process, including the Copenhagen Criteria and areas of the EU acquis covered by the Fundamentals and Internal Market clusters. They should, however, be understood as one component of a much broader, merit-based accession process.[30]

Challenge 2: Regulatory Resilience & Proactive Supply Chain Mapping

A. Navigating the "Sustainability Omnibus"

While the formal transposition of the Corporate Sustainability Due Diligence Directive (CSDDD)[31] into national law in EaP countries may not be mandatory until 2027–2028, the market reality is already here. This is due to the "spillover effect" of three interconnected EU regulations:

- **The "Contractual Flow-down" (CSDDD)**

Even before EaP countries pass their own laws, large EU-based "lead firms" will be legally required to identify and mitigate human rights and environmental risks across their entire "chain of activities". An EU buyer will not wait for EaP legislation; they will simply update their Supplier Code of Conduct. To sign a contract, an EaP supplier must legally guarantee they have due diligence systems in place. If they cannot, they are legally "un-sourceable" for the EU buyer.[32]

- **The Data Demand: CSRD and ESRS**

The Corporate Sustainability Reporting Directive (CSRD)[33] requires large EU companies to report on their "Scope 3" emissions and social impacts: To fulfill their reports, EU buyers need granular data from their EaP suppliers (e.g., precise water usage, gender pay gap metrics, or safety incident rates); "Speaking the regulatory language" means being able to provide data that fits the European Sustainability Reporting Standards (ESRS). An EaP company that can provide an "ESRS-aligned data pack" can become a preferred partner over one that only provides vague promises.

- **Border Measures:**

The "No-Entry" Regulations

Beyond corporate reporting, the EU has introduced "product-level" laws that act as gatekeepers to the Single Market:
EU Deforestation Regulation (EUDR): Affects EaP exports of timber, soy, and cattle. No data on the "geolocation" of the plot of land means the goods are blocked at the border.[34]

EU Forced Labor Regulation: Allows the EU to ban any product from the market if there is evidence of forced labor at any point in the supply chain (a major risk for "Grey Zone" operations).[35]

- **Why "Waiting" is a Business Risk**

Regulatory resilience means understanding that compliance is now a "Quality Standard", much like ISO certification.

EaP businesses that build these systems proactively can strengthen their position as reliable suppliers by helping EU customers meet their own due diligence and reporting obligations. Demonstrating robust human rights and sustainability processes may therefore support longer-term commercial relationships and reduce compliance-related barriers in EU value chains.

B. The Threat of "De-risking"

A potential challenge for EaP suppliers is the risk that EU lead firms may choose to disengage from business relationships where human rights or environmental risks are considered difficult or costly to address. Under established responsible business conduct standards, however, disengagement should generally follow efforts to prevent or mitigate adverse impacts and should itself be carried out responsibly, taking into account potential adverse consequences.[36]

For an EU company, maintaining a supplier in an "opaque" jurisdiction requires high costs for verification, site visits, and legal reviews. If the cost of validating a supplier's claims exceeds the profit margin, the buyer might "de-risk" by moving their contract to a more transparent jurisdiction.

EaP firms may face additional scrutiny from EU buyers, investors, financial institutions and other international business partners because of perceived risks associated with regional instability and weaker transparency in some markets. To address these concerns, companies can strengthen transparency by maintaining up-to-date, verifiable information on their human rights, social and environmental performance.

By adopting international standards (like ISO or ILO safety frameworks) and maintaining on-demand performance data, EaP firms can remove the "compliance headache" for the buyer. This ensures that the geographic advantage of "nearshoring" isn't cancelled out by the "burden of proof".

C. Strategic Supply Chain Mapping: From Visibility to Traceability

Traditionally, EaP companies have only managed their Tier 1 suppliers (the ones they pay directly).

Human rights due diligence is not limited to a company's direct or Tier 1 suppliers. Adverse human rights impacts may be directly linked to a company's operations, products or services through business relationships further upstream or downstream in the value chain, including relationships with which the company has no direct contractual link. Companies should therefore identify and assess relevant risks beyond their immediate suppliers, prioritising the most severe and likely adverse impacts.[37]

The EU CSDDD and EU Forced Labour Regulation use the term "Chain of Activities". This means legal due diligence now covers the entire upstream activities (raw material extraction, farming, and processing) and specific downstream activities (transport, storage, and distribution).

Visibility is the first step: knowing who is in the chain. For the EaP, this is often a complicated step due to informal economies and complex sub-contracting. Businesses must move beyond a list of names to a geographic and operational map. Mapping identifies "informal" sub-contractors that often emerge during peak seasons in agriculture or construction. Visibility allows management to bring these "shadow" workers into the formal system of protections.

Strategic mapping can serve as a risk-detection tool that allows a company to find "weak links» before an EU buyer does. Mapping allows a company to identify a supplier that lacks safety equipment or pays below the minimum wage. Under the CSDDD, the goal is to improve the chain, not just cut off suppliers. Mapping allows EaP firms to work with their "Tier N" partners to raise standards. However, if a supplier refuses to improve, mapping provides the evidence needed for a "Responsible Disengagement" – protecting the EaP exporter from being associated w the supplier's abuses.

D. Operational-Level Grievance Mechanisms (OGM): The Early Warning System

Under the CSDDD, an effective grievance mechanism is a mandatory, high-standard pathway for workers, communities and other stakeholders to report adverse impacts.

To be compliance-ready, a mechanism must be accessible, anonymous, and trusted.[38] In the EaP context – where trust in formal institutions can be low – businesses must build "culturally appropriate" channels. This might include mobile apps, community liaisons, or third-party managed platforms.

An OGM acts as a risk sensor. It allows a manager to solve a labor dispute or an environmental concern internally before it escalates into a strike, a public scandal, or a legal complaint filed in a court.

Compliance-readiness also means having a clear "playbook" for what happens after a report is made – ensuring that the business knows how to provide a remedy (e.g., back-pay for unpaid overtime) without retaliating against the worker.

E. Strategic Outcome for the Roadmap

By institutionalizing regulatory resilience and supply chain mapping, the EaP region moves from a position of "Regulatory Vulnerability" to "Market Integration."

- **For the Company: Becoming a "Low-Friction" Partner.** By building these systems now, EaP companies eliminate the "compliance drag" that often deters EU buyers. A company that provides on-demand, ESRS-aligned data and a mapped "Chain of Activities" transforms from a high-maintenance supplier into a seamless, preferred partner:

  – **Environmental (E):** Not just I stating that the company is green, but providing specific data on carbon emissions, water consumption, and waste management.

  – **Social (S):** Hard data on the workforce, such as the gender pay gap, the number of safety incidents, and evidence that there is no child or forced labor in the «Chain of Activities.»

  – **Governance (G):** Information on how the company prevents corruption and how it manages its ethical responsibilities.

- **For Risk Management: Proactive "Weak Link" Detection.** Strategic mapping allows businesses to identify and remediate labor or environmental gaps (e.g., safety failures or informal sub-contracting) internally. This prevents the "sudden death" of a contract that occurs when a violation is discovered by an external EU buyer or a regulatory border check.

- **For Legal Accountability: Reducing Litigation Risk through OGMs.** Effective OGMs act as the first line of defense. By resolving disputes locally and providing immediate remedy, companies prevent minor labor or community issues from escalating into international lawsuits or being flagged under the EU's civil liability regimes.

- **For the Region: Countering the De-risking Trend.** As a collective, the EaP region can rebrand itself as a "Safe Harbor for Responsible Nearshoring". When the "burden of proof" is met pre-emptively by local firms, the economic incentive for EU companies to "exit" the region is replaced by an incentive to deepen investment in a transparent, compliant neighborhood.

- **For EU Accession: Mastering the "Internal Market" Acquis.** For Ukraine, Moldova, and Georgia, this pillar is a practical rehearsal for full EU membership. Successfully implementing the Sustainability standards in CSDDD, CSRD, and the Taxonomy demonstrates that these nations are not just political candidates, but economically ready to operate within the high-standard regulatory environment of the EU Single Market.

Challenge 3: Operational Resilience & Risk Mitigation through Safeguards

A. Fair Wages and the "Living Wage" Standard

A worker who cannot meet basic needs, can also become a high-risk employee in terms of operational resilience.

- Living Wage vs. Minimum Wage: While national minimum wages are often low, resilient businesses are adopting living wage benchmarks. This ensures workers can afford housing, food, and education for their families.

- The Hidden Cost of Turnover: High employee turnover can create significant costs for businesses through repeated recruitment, onboarding and training, as well as the loss of skills and institutional knowledge. Measures that support fair working conditions, adequate remuneration and worker retention can therefore contribute to greater operational stability.

- Safety as a Productivity Tool: Implementing ILO (International Labour Organization) Safety Protocols[39] is about more than avoiding fines. It is about ensuring that production is never halted by a preventable industrial accident. A high accident rate is a "red flag" that can lead an EU buyer to immediately terminate a contract.

B. Grievance Mechanisms

A functional, anonymous internal grievance mechanism is a business's best Early Warning System.

- Resolving Issues earlier: Effective grievance mechanisms can help businesses identify and address workplace concerns – such as occupational safety problems, disputes with supervisors, or unpaid overtime – before they escalate into more serious disputes or adverse impacts. They can therefore function as an early-warning mechanism for operational and human rights risks.

- Preventing External Escalation: In the era of the EU CSDDD, a labor dispute that spills over into the public eye or a courtroom can become a reputational disaster. If a worker has no way to complain inside the company, they will complain outside – to an NGO, a journalist, or directly to the EU buyer's headquarters.

- Trust and Anonymity: To be effective, the system must guarantee that a worker will not face retaliation. When workers trust the system, they provide management with a "real-time map» of operational risks that no external consultant could ever provide.

C. Strategic Outcome: The "Stable Neighbor" Advantage

The EaP region's ability to prevent labor unrest is a core part of its value proposition to the EU.

- Reliability: For an EU buyer, a "Socially Safeguarded" supplier in the EaP is a reliable supplier. They know their production line won't be shut down by a sudden strike.

- Reputational Safety: Many leading firms in the EU heed "complicity scandals" involving labor exploitation. An EaP partner with proven social safeguards and a functional grievance mechanism provides the buyer with the peace of mind they need to sign long-term, high-value contracts.

D. The "Social License to Operate": Preventing Community Protests

Resilient businesses do not just "inform" locals of a new project; they engage in Free, Prior, and Informed Consent (FPIC) or its equivalent. This builds a «Social License to Operate» – an unwritten agreement where the community supports the business because they see shared value (jobs, clean water, infrastructure). Without these safeguards, businesses face the risk of physical blockades or local sabotage, which can halt production for months and deter international investors who fear "community-based political risk".

E. Environmental Stewardship: Preventing Ecological Disasters

As the EaP region faces the effects of climate change – including water scarcity in the South Caucasus and soil degradation in Moldova – environmental safeguards are essential for continuity.

Implementing strict waste-management and chemical-handling protocols prevents industrial accidents (like tailing dam failures or chemical spills) that can lead to massive state fines, criminal charges, and permanent loss of the right to operate.

Resilient businesses can address these risks by mapping their water and energy dependencies. By reducing consumption, they can protect themselves against the rising utility costs and resource shortages that are becoming common across the region.

F. Strategic Outcome for the Roadmap

By institutionalizing operational safeguards, the EaP region can move from a model of "Crisis Management» to one of "Strategic Stability".

- **For the Company: Ending the "Turnover Tax."** In a region defined by labor migration, operational resilience transforms the workforce from a transient cost into a loyal asset. By providing a living wage and a safe, respectful environment, companies can drastically reduce the costs of recruitment and retraining, directly improving their long-term profitability.

- **For the Investor: Mitigating "Local Volatility."** International financiers (EIB, EBRD, and ESG-led private equity) prioritize assets that are "protest-proof" and "disaster-ready." Proven Social License and Environmental

Stewardship move projects into the "low-risk" category, unlocking lower interest rates and making the company a magnet for high-quality European capital.

- **For the Supply Chain: The "Never-Off-line» Partner.** Operational resilience ensures that the EaP acts as a reliable "Stable Neighbor" for the EU. By resolving disputes through internal Grievance Mechanisms and preventing industrial accidents through ILO protocols, EaP firms can guarantee that their production lines remain active while global competitors suffer from strikes and environmental shutdowns.

- **For Legal Accountability: Building an "environmental and social (E&S) Shield".** Under the civil liability provisions of the CSDDD, companies can be held liable for harms in their chain. Having robust, internalized safeguards can act as a legal shield, demonstrating that the business has exercised "reasonable care" and "due diligence" to prevent social and environmental damage before it occurs.

- **For Resource Security: Strengthening Resilience to Resource Constraints.** By identifying their dependencies on water, energy and other critical resources, businesses can better assess and manage risks arising from resource scarcity, supply disruptions and increasing climate-related pressures. Measures to improve resource efficiency and diversify critical inputs can strengthen operational resilience and reduce exposure to disruptions.

- **For the Region: Growth as a "Social Dividend."** When businesses respect land rights and environmental boundaries, economic growth is no longer a source of local tension; it becomes a tool for community development. This ensures that the path toward the EU is paved with public support, as citizens see corporate sustainability delivering tangible benefits like clean water, safe jobs, and stable infrastructure.

Roadmap

In this chapter, the challenges in the region are analyzed based on the goals and the pillars of the UNGPs: Pillar 1. The State Duty to Protect Human Rights; Pillar 2. The Corporate Responsibility to Respect Human Rights; and Access to Remedy. The chapter accounts for what Strategic drivers can motivate change, and which focus areas are needed to address the most central BHR issues.

Pillar 1: The State Duty to Protect (Policy, Regulation, and Oversight)

Goal: *To establish a coherent legal and institutional framework that moves the region to "Integrity in Action," ensuring that economic growth is inseparable from the protection of rights.*

1 Institutionalizing Policy Coherence

The primary failure identified in the region is the disconnect between investment attraction and human rights protection.

All five EaP countries will have launched or implemented standalone national action plans on business and human rights (NAP) based on the UN Guiding Principles (UNGPs) and the 2023/2024 OECD Guidelines for Multinational Enterprises.

- **Ukraine & Moldova (The Accession Path):**

Strategic Driver: Fulfillment of the EU Accession Clusters, specifically Cluster 1: The Essentials (Justice and Fundamental Rights) and Cluster 2: Internal Market.

Focus: NAPs must move beyond general human rights language and include mandatory Human Rights Due Diligence (HRDD) requirements for exporters to ensure they are not excluded from the EU Single Market due to the CSDDD.

- **Georgia (Resolving the Enforcement Paradox):**

Strategic Driver: Restoring the "State Duty to Protect" by ensuring that the existing BHR chapter (which has been «stuck» due to political shifts) is upgraded to a standalone NAP.

Focus: Explicitly protecting the independence of Civil Society "Watchdogs" and NHRIs to ensure corporate conduct is monitored without political interference.

- **Armenia & Azerbaijan (Investment and Transit Corridors):**

Strategic Driver: Securing the "Social License to Operate" for the Middle Corridor and extractive sectors.

Focus: Armenia must finalize its first standalone NAP to address labor rights and environmental risks in mining. Azerbaijan must transition from Ombudsman-led initiatives to a government-wide NAP that mandates transparency in the oil, gas, and construction sectors (specifically regarding land rights).

2 The State as a Role Model (Leading through the State-Business Nexus)

Since State-Owned Enterprises (SOEs) and Municipally Owned Enterprises (MOEs) are dominant economic actors, the state must use its leverage to set regional standards.

Mandatory HRDD for SOEs: Governments should mandate that all SOEs – particularly in the energy, mining, and transport sectors – implement Heightened Human Rights Due Diligence (hHRDD) and publish annual sustainability reports aligned with the EU ESRS standards.

BHR in Public Procurement: States must use the power of the purse. Under the EU Accession Acquis, public procurement must move from "Lowest Price" to "Best Value", where "Value" includes a verified record of human rights and environmental compliance.

3 Modernizing the Regulatory Landscape (Corporate Sustainability Due Diligence Directive and Forced Labour Regulation Readiness)

To prevent the systemic "De-risking" of EaP exporters, the state must act as a technical enabler for EU market entry.

"Mirror Legislation" Frameworks: States should develop national frameworks that mimic the EU Corporate Sustainability Due Diligence Directive (CSDDD). This provides local businesses with a "Legal Safe Harbor" and ensures that the "Burden of Proof" for human rights integrity is supported by national institutions rather than solely by individual companies.

Trade-Linked Protections: For Moldova (Transnistria) and Georgia, the state must ensure that trade preferences under the DCFTA are contingent on the verified absence of forced labor, providing a level playing field for companies operating in high-risk "Grey Zones".

4 Strengthening Independent Monitoring and Access to Remedy

The 2023 Scoping Study highlights that NHRIs and NCPs are currently underutilized "islands of integrity".

Empowering NHRIs (Paris Principles): States must expand the mandates of National Human Rights Institutions (NHRIs) to investigate complaints against private enterprises. NHRIs should be protected from political interference (critical in the current Georgian context) to remain credible mediators between communities and industry.

Functional National Contact Points (NCPs): For OECD members and adherents (Ukraine, Georgia), the OECD National Contact Point (NCP) must be moved from "dormant" to "operational". This requires professional staffing and an advisory board that includes independent trade unions and CSOs to handle cross-border supply chain grievances effectively.

5. Protecting the "Watchdog" Environment

A functional BHR framework is impossible without an independent civil society.

Safeguarding Civil Space: The state has a duty to protect human rights defenders and journalists who report on business-related abuses. Regulatory resilience requires that laws – such as "foreign influence" transparency acts – do not become tools for the harassment of BHR monitors.

2026 Strategic Outcome: «Regulated Integrity»

- **For the State:** Transitions from a "High Risk" jurisdiction to a "Reliable Partner" status in the global economy, directly accelerating EU Accession. Transitions to a legal and institutional system that is aligned with established international standards, enhancing rule of law and human rights, in line with principles on integrity and core values in the EU.

- **For the Economy:** Eliminates the competitive advantage of "irresponsible" oligarchic actors by making transparency a mandatory requirement for capital and market access.

- **For Society:** Resolves the "Telephone Justice" problem by providing credible, non-judicial pathways (NHRIs/NCPs) that build public trust in the rule of law.

Pillar 2: Corporate Responsibility to Respect (Private Sector Operations)

Goal: *To transition the EaP private sector from a "Philanthropic CSR" model to a risk-based "Human Rights Due Diligence (HRDD)" framework, ensuring businesses become seamless, preferred partners in global value chains.*

1 Navigating the "Sustainability Omnibus" (Market Readiness)

While the formal transposition of the EU CSDDD into national law may still be in progress, the "Contractual Flow-down" is already a commercial reality.

Large EU lead firms are now legally required to mitigate risks across their entire "Chain of Activities." An EaP supplier must legally guarantee it has an active HRDD system. Without this, they become "un-sourceable".

Businesses must move away from narrative-based CSR stories to providing verified, ESRS-aligned data (European Sustainability Reporting Standards).

2 Strategic Supply Chain Mapping: From Visibility to Traceability

The roadmap moves beyond managing direct (Tier 1) suppliers to oversight of the entire upstream and downstream journey.

Tier 1 to Tier N Mapping: Resilient businesses must map sub-contractors and raw material providers to identify hidden "weak links" (e.g., child labor in agricultural harvesting or informal sub-contracting in construction) before they are flagged during an EU buyer's Performance Verification review.

3 Institutionalizing "Compliance-Ready» Internal Systems

Rather than waiting for regulatory enforcement, the roadmap prioritizes the immediate internalization of BHR standards into daily management.

Operational-Level Grievance Mechanisms (OGM): Companies must establish accessible, anonymous pathways for workers and communities to report adverse impacts. These OGMs act as "Risk Sensors", allowing management to solve labor disputes internally before they escalate into strikes, public scandals, or international lawsuits.

Policy Internalization: Human Rights policies must move out of the PR office and into Purchasing, HR, and Operations.

4 Heightened Human Rights Due Diligence (hHRDD) in Conflict Contexts

Businesses in the region must apply a "Conflict-Sensitivity Lens".

Integrity of Recovery: For Ukrainian firms, hHRDD is essential to prove that reconstruction activities do not utilize materials from occupied territories or benefit from war crimes.

Transit Corridor Neutrality: For firms in the South Caucasus, hHRDD ensures that infrastructure development (The Middle Corridor) respects ethnic neutrality in hiring and does not violate land rights in contested zones.

5 SME Maturity and the "Social License to Operate"

Since SMEs dominate the EaP economy, the roadmap focuses on scalable tools to prevent "compliance drag."

SME Performance Portfolios: SMEs will develop "Integrity Portfolios" to pre-emptively satisfy the due diligence requirements of international financiers (EIB, EBRD).

Meaningful Consultation: Secured through Free, Prior, and Informed Consent (FPIC) or its equivalent, businesses build a "Social License to Operate." This partnership with local communities prevents the physical blockades and protests that deter international capital.

Strategic Outcome for the Roadmap (Pillar 2)

- **For the Company: Preferred Supplier Status.** Mastering HRDD moves EaP firms from "high-risk" vendors to "strategic partners", capturing market share from non-transparent competitors in other global regions.

- **For Market Competitiveness: Reversing De-risking.** By providing verified transparency, the EaP region rebrands itself as a "Safe Harbor for Responsible Nearshoring", where the burden of proof is met pre-emptively by local industry.

- **For Financial Access: Lowering the Risk Premium.** Companies with proven hHRDD and E&S safeguards gain access to specialized EU reconstruction funds and lower-interest "Green and Social" credit lines.

- **For society: Stability and Livelihoods.** Internalizing safeguards ensures that economic growth does not trigger social conflict, but instead delivers a "Social Dividend" through safe jobs, fair wages, and environmental protection.

Pillar 3: Access to Remedy (Accountability & Redress)

Goal: *To ensure that victims of business-related human rights and environmental abuses have access to effective judicial and non-judicial grievance mechanisms, preventing the escalation of local disputes into global compliance crises.*

1 Strengthening Judicial Pathways (Resolving "Telephone Justice")

The 2023 Scoping Study identified that judicial independence remains fragile, often subject to political influence in high-stakes corporate cases.

Specialized Capacity Building: States must provide mandatory training for judges, prosecutors, and the legal profession on the BHR legal acquis (CSDDD, IHL, and OHS standards). This ensures that courts can handle complex supply chain liability cases without defaulting to political or oligarchic interests.

Collective Redress (Class Actions): In line with Armenian civil procedure reforms and EU trends, states should lower the barriers for group actions. This allows communities impacted by industrial pollution or systemic labor violations to seek justice collectively, reducing the "power asymmetry" between local populations and large enterprises.

2 Operationalizing "Islands of Integrity" – National Human Rights Institutions and National Contact Points on Responsible Business Conduct

Non-judicial mechanisms must be moved from "dormant" to "active" to provide fast-track, cost-effective redress.

National Human Rights Institution (NHRI) Mandate Expansion: NHRIs must be empowered under the Paris Principles to investigate complaints against private and state-owned enterprises. To be credible in 2026, NHRIs must be legally protected from the "watchdog harassment" recently seen in the region.

OECD National Contact Point on Responsible Business Conduct (NCP) Reboot: For OECD adherents (Ukraine, Georgia), the NCP must be transformed into a functional mediation body. This includes creating an independent Advisory Board with representatives from trade unions and CSOs to handle cross-border supply chain grievances brought by EU lead firms or local victims.

3 Mandatory Operational-Level Grievance Mechanisms (OGM)

Under the EU CSDDD, a company-level grievance mechanism is a mandatory pathway for risk management.

The OGM as a "Risk Sensor": Businesses must move beyond "suggestion boxes" toward culturally appropriate, anonymous digital platforms (e.g., mobile apps). These allow workers, IDPs, and migrants to report abuses (such as sexual harassment or unpaid overtime) internally.

Remediation Readiness: Being "compliance-ready" means having a clear Remediation Playbook. If a violation is found, the company must provide an immediate remedy (e.g., back-pay, reinstatement, or environmental cleanup) to prevent the issue from being flagged during an external EU buyer's Performance Verification.

4 Protecting Vulnerable Groups & Watchdogs

The Scoping Study highlights that IDPs, women, and ethnic minorities are the least likely to access remedy.

Legal Aid for the "First Mile": States and donors must fund CSOs to provide legal representation for communities in remote or conflict-affected areas. This is critical for protecting the Social License to Operate in the Middle Corridor transit routes.

Safeguarding Human Rights Defenders: Regulatory resilience requires that those who report on business abuses are not targeted with Strategic Lawsuits Against Public Participation (SLAPPs) or "foreign influence" labels.

Strategic Outcome for the Roadmap (Pillar 3)

- **For the Company: Proactive Dispute Resolution.** Internalizing OGMs allows businesses to resolve issues "on-site" before they become public scandals or trigger the civil liability provisions of the CSDDD. It transforms the company into a "Strategic, Low-Risk Partner" for EU buyers.

- **For the Investor: Mitigating "Local Volatility.»** Proven access to remedy makes an asset "Protest-Proof". International financiers (EIB, EBRD) offer lower interest rates to projects with verified grievance mechanisms, as they face fewer risks of blockades or reputational damage.

- **For the Supply Chain: Building a "Resilient Operations Culture".** Access to remedy ensures that the regional workforce is safe and stable. By providing a "safety valve" for grievances, EaP firms prevent the strikes and environmental disasters that cause sudden halts in production.

- **For EU Accession: Institutional Maturity.** Successfully resolving business-related disputes through NHRIs and NCPs fulfills the "Essentials" Cluster of the EU Acquis. It proves that the candidate country can guarantee the rule of law within its private sector, a prerequisite for Single Market membership.

Endnotes

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