

OECD Guidelines: Human Right Impact Assessment

QUESTION	Yes act.	Yes Pot.	No impact	Describe the adverse impact	Indicators
Human Right Impact					
1. Risk of potential or actual adverse impacts in relation to THE RIGHT TO SELF-DETERMINATION (INDIGENOUS PEOPLES RIGHTS)?			X	DRC assesses that it is not at risk of having adverse impacts on the right to self-determination (indigenous peoples rights).	
2.1. Risk of potential or actual adverse impacts in relation to THE RIGHT TO NON-DISCRIMINATION?				<p>Hiring, working conditions, client interaction, communication. DRC may discriminate based on ethnic origin (includes all mentioned discrimination grounds):</p> <ul style="list-style-type: none"> - During the hiring of employees, - in the treatment of employees, - In internal and external communications (representation etc.). <p>We acknowledge that Denmark has been challenged by international organizations in how the state deals with discrimination on these grounds. Mastering Danish and English on a business level is crucial to our organization, because we have non-danish speaking members, hence we expect this competence for all our employees, acknowledging that it may lead to indirect discrimination.</p> <p>DRC will:</p> <ul style="list-style-type: none"> - Establish grievance mechanisms for employees in relation to all potential impacts at HQ and encourage employees to flag issues at regular all-staff meetings. - Seek to ensure with our external providers that they ensure proper representation in presentation and communication materials. - Update the staff handbook to address potential adverse impacts on this right (include all discrimination grounds). - Create questions in the work place assessment that allows staff to report discrimination (both their own experiences and other challenges they see with discrimination on all discrimination grounds) - Review whether employment contract should be updated for all potential impacts - Seek to have management conduct 'unconscious bias's training. - Update design manual to include these and other elements if necessary - Develop designated DRC employee impact survey with inspiration from DRC industry-specific impacts survey. (Includes this and all other potential impacts). 	<ol style="list-style-type: none"> 1. Establish grievance mechanism. 2. Number of reported incidents of discrimination. 3. Work place assessment will be conducted in 2022 (APV). 4. Employee impact survey conducted in 2022. 5. Anti-discrimination as part of new staff handbook.
2.2. Risk of potential or actual adverse impacts in relation to THE RIGHT TO NON-DISCRIMINATION?				<p>DRC may have adverse impacts:</p> <ul style="list-style-type: none"> - Persons with mobility challenges may experience adverse impacts due to the accessibility to/in our working environment Persons with disabilities and/or health challenges may experience unequal opportunities regarding employment and promotion. <p>DRC will:</p> <p>See actions under HR 2.1 ('Race', color, national origin or ethnicity, language).</p> <ul style="list-style-type: none"> - Enquire with the lessor on the establishment on contemporary accessibility for people with disabilities to our premises. - Establish sound absorbing solutions to decrease noise. 	<p>See indicators under HR 2.1</p> <ol style="list-style-type: none"> 1. Lessor contacted. 2. Sound absorbing solutions established.

<p>2.3. Risk of potential or actual adverse impacts in relation to THE RIGHT TO NON-DISCRIMINATION?</p>		<p style="text-align: center;">x</p>	<p>Employees or applicants may experience that age is a factor, when applying for a job in DRC. STAFF: DRC may have adverse impacts on the right to non-discrimination based on age, especially because of lack of attention to the subject in Denmark in general.</p> <p>DRC will: (See actions under HR 2.1) - Hires based on experience and competencies while also assessing the flexibility/social match of the potential employee in relation to working for a value-based organization that operates in a political environment. - Ensures that explicit age requirements or references to age are not expressed in staff handbooks, job postings or other communications. - welcomes full-time employees of all ages above 18.</p>	<p>See HR 2.1</p>
<p>2.4. Risk of potential or actual adverse impacts in relation to THE RIGHT TO NON-DISCRIMINATION?</p>		<p style="text-align: center;">x</p>	<p>(Gender and sexual orientation) Representation of gender/ people with different sexual orientations amongst employees and in board of directors. DRC may cause adverse impacts on the right to non-discrimination based on gender and sexual orientation: STAFF: - During the hiring of employees, or - in the treatment of employees. Member/partner representatives: - in treatment of member/partner representatives We acknowledge that while Denmark has been challenged by international organizations on how Denmark deals with discrimination, it continues to be a frontrunner regarding gender equality and LGBTQ+ issues, but still with issues regarding stereotypes and prejudices. We acknowledge that there is an underrepresentation of women amongst our board of directors, while amongst our employees we have an underrepresentation of male employees.</p> <p>DRC will: DRC will: -Ensure that the grievance mechanism to be established will appreciate that sexist and other discriminating language and behaviour is not tolerated. - further embed a focus on this right in our recruitment processes through focusing directly on competencies when recruiting. - encourage to report any incidents of discrimination directly top management. -contribute with 'best practice' examples concerning representation of women (and in general a diversified employee group) and thereby seek to improve representation of women in the industry.</p>	<p>See HR 2.1 1. Gender representation amongst employees and in board of directors.</p>
<p>2.5. Risk of potential or actual adverse impacts in relation to THE RIGHT TO NON-DISCRIMINATION?</p>		<p style="text-align: center;">x</p>	<p>DRC may have adverse impacts on the right to non-discrimination based on social status, political position or religion. - In the process of hiring - In the treatment of employees - When engaging with business partners and customers</p> <p>DRC will: See actions under HR 2.1 1) Qualify what is meant with extremism (i.e.. Politics promoting human rights adverse Impacts: discrimination/harassment/degrading treatment/war propaganda/incitement of racial, religious or national hatred)</p>	<p>See indicators under HR 2.1 1. Establish grievance mechanism. 2. Number of reported incidents of discrimination. 3. Results from the work place assessment. 4. Anti-discrimination as part of new staff handbook and work place assessment.</p>

<p>3.1. Risk of potential or actual adverse impacts in relation to THE RIGHT TO WORK (contract/training/termination) ?</p>		<p>X</p>	<p>DRC may have adverse impacts on the right to receive in writing an adequate description of skills requirements and job description:</p> <ul style="list-style-type: none"> - In the formulation of employment contracts. - In requiring employees to carry out work that was not outlined in their contract. - By not providing sufficient opportunities for employees to discuss the terms of their contract. - By failing to provide for a contract / employment letter before job start. - Not having clear job descriptions in employment contracts or by not updating these when changes in job occurs. <p>DRC:</p> <ul style="list-style-type: none"> - Clearly indicates expected working hours. - Provides for sufficient time and clarifications for all employees to consider and negotiate any element of their contract - Secures that ALL employees have a signed employment contract by the beginning of their work, attached to the administrative salary system - Have job descriptions in employment letters/employment contracts and provides for annexes in case of change of function or other circumstances. <p>DRC will:</p> <ul style="list-style-type: none"> - Review template contracts to ensure that they reflect best practice (in relation to all risk areas.) - Ensure that this or any other potential impact is reflected in our staff handbook. 	<ol style="list-style-type: none"> 1. Number of complaints/reports on lacking contracts or job descriptions. 2. Score in work place assessment. 3. Template contracts reviewed 4. Staff handbook updated
<p>3.2. Risk of potential or actual adverse impacts in relation to THE RIGHT TO WORK (contract/training/termination) ?</p>		<p>X</p>	<p>DRC may have an adverse impact on the right to work by not supplying sufficient training to employees:</p> <ul style="list-style-type: none"> - When they start working at DRC, - throughout their working life at DRC, or - when they transition from one position to another. <p>DRC:</p> <ul style="list-style-type: none"> - Has onboarding: introducing new employees to all functions in the house and offering training programs for all / new employees in responsible business conduct. (e.g. training in the UNGPs/ OECD Guidelines) - Encourages employees to participate and take initiative to get relevant courses and training as described in staff handbook, - Ensures adequate training on all emerging specialist needs in relation to our advisory services. 	<ol style="list-style-type: none"> 1. Number of complaints/reports on lacking training. 2. Score in work place assessment.
<p>3.3. Risk of potential or actual adverse impacts in relation to THE RIGHT TO WORK (contract/training/termination) ?</p>		<p>X</p>	<p>None, or insufficient notice of termination.</p> <p>DRC may have adverse impacts on the right to work by not securing that employees notice of termination is of an acceptable length or rationale.</p> <p>DRC:</p> <ul style="list-style-type: none"> - Gives fair notices of termination for the majority of their employees (at least three months - unless the employee exhibits gross neglect of service or is hired on trial). - Clearly indicates conditions for notice of termination in contract/letter of employment. - Provides unformalized exit-talks should employees resign. 	<ol style="list-style-type: none"> 1. Number of complaints/reports on lacking, too short notices or unfounded termination. 2. Score in work place assessment.

<p>4a. Risk of potential or actual adverse impacts in relation to THE RIGHT TO EQUAL PAY FOR EQUAL WORK?</p>		<p style="text-align: center;">X</p>	<p>Differences in pay for men and women with similar work tasks.</p> <p>DRC may have adverse impacts on the right to equal pay for equal work; especially with regard to the possible difference in pay between men and women, but also in a broader sense with regard to all the grounds for discrimination mentioned under the right to non-discrimination (HR2):</p> <ul style="list-style-type: none"> - When determining salaries, - when evaluating work effort, i.e. determining bonuses etc. <p>Most positions in DRC are highly specialized whereas it makes it difficult to compare the various job functions.</p> <p>DRC recognizes that Denmark is known for a relatively high representation of women in the work force, while Denmark still is criticized for lack of equal pay for equal work for women. This might further be an issue with regard to other discrimination grounds (see HR2).</p> <p>DRC will:</p> <ul style="list-style-type: none"> - Ensure that our staff handbook describes that remuneration depends solely on results, seniority and competence. 	<p>1. Number of complaints/reports on equal pay for equal work.</p>
<p>4b. Risk of potential or actual adverse impacts in relation to THE RIGHT TO A LIVING WAGE?</p>		<p style="text-align: center;">X</p>	<p>DRC does not assess that we are at risk of adverse impacts on the right to a living wage.</p> <p>DRC does employ a few student assistants working up to 20 hours a week and at a reasonable hourly pay in addition to the fact that student job will enhance their studies and career opportunities.</p> <p>In relation to our work with our members, DRC has calculated a living wage for Copenhagen, Aarhus and Silkeborg areas.</p>	
<p>4c. Risk of potential or actual adverse impacts in relation to THE RIGHT TO SAFE AND HEALTHY WORKING CONDITIONS?</p>		<p style="text-align: center;">X</p>	<p>Stress related impacts. Office work challenges.</p> <p>DRC may have adverse impacts on the employees' right to safe and healthy working conditions primarily in relation to stress, but also in relation to work primarily being performed at the table in front of the computer.</p> <p>During most of 2020 Covid-19 has provided an extraordinary risk in relation to this human right.</p> <p>DRC:</p> <ul style="list-style-type: none"> - Ensures improved health insurance for employees. - Conduct regular employee development talks. - Conduct regular workplace assessments. - The dedicated coordinator on health and safety receives specific training on any emerging areas within health and safety every <p>DRC will:</p> <ul style="list-style-type: none"> - an updated actionplan on safe and healthy working conditions, in particular stress management, on Teams. - Conduct a dedicated workshop on mental well-being. -Will consider conducting regular employee impact surveys. 	<p>1. Number of complaints/reports on safe and healthy working conditions.</p> <p>2. Score in work place assessment (next assessment 2022).</p> <p>3. Decision on employee impact survey.</p> <p>4. Teams/Teams section updated</p>

<p>4d. Risk of potential or actual adverse impacts in relation to THE RIGHT TO EQUAL OPPORTUNITIES FOR EVERYONE TO BE PROMOTED?</p>		<p style="text-align: center;">X</p>	<p>DRC may have adverse impacts for employees in relation to the right to equal opportunities for everyone to be promoted (all grounds mentioned in HR2). Despite the fact that women in Denmark are well represented on the labour market, representation of women in management in the private sector is very low; This might be an expression of a lack of equal opportunities to be promoted for women, in comparison to men. This might also be the case for other minority groups mentioned in HR2. (See actions in relation to HR 2. non-discrimination and HR 3. right to work).</p> <p>DRC:</p> <ul style="list-style-type: none"> - Has at present two of seven board members that are female and has a continuous focus on improving a balanced gender representation. - Seeks to maintain a balanced gender representation in its management team. - Underlines to all employees that promotion is only based on result, special competences and seniority, also considering that the ability to address the public in relation to elements under one's area of expertise. <p>DRC will:</p> <ul style="list-style-type: none"> - Develop strategy to improve representation of women. 	<ol style="list-style-type: none"> 1. Number of complaints/reports on discrimination by promotion. 2. Score in work place assessment. 3. Strategy prepared on representation of women in board members
<p>4e. Risk of potential or actual adverse impacts in relation to THE RIGHT TO REST, LEISURE AND PAID HOLIDAYS?</p>		<p style="text-align: center;">X</p>	<p>Overtime work. DRC may have adverse impacts on employees right to rest, leisure and paid holidays by:</p> <ul style="list-style-type: none"> - Allowing or encouraging overtime work. - Not ensuring that employees have the opportunity to take vacation. <p>DRC: (See also HR 4c)</p> <ul style="list-style-type: none"> - In contract a weekly working schedules with an expectation of verage of 37 hours a week for all staff. - Has an agreement on a minimum of five weeks paid holiday a year, and additional five days to be determined pr. request. - Has a holiday calendar. - Appreciates that the workload in DRC varies a lot and that the workload has been extraordinary during Covid-19 and invites for a flexible interaction with its employees expecting employees to manage their own time, while ensuring that management allows for flexibility. 	<ol style="list-style-type: none"> 1. Number of complaints/reports on overtime or lacking holiday. 2. Score in work place assessment. 3. Staff handbook and contractks updated in relation to this right.
<p>5. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FORM AND JOIN A TRADE UNION AND STRIKE?</p>		<p style="text-align: center;">X</p>	<p>DRC has not entered into any collective agreements, as DRC has not identified a need for this or a suitable agreement. However, DRC will not discourage any employee's individual membership of a union of their own choice. In addition, DRC is an employers association that is not participating in collective agreements, however we are advising our members on such participation: including both how to enter and how to terminate such agreements.</p>	

<p>6. Risk of potential or actual adverse impacts in relation to THE RIGHT TO SOCIAL SECURITY INCLUDING SOCIAL INSURANCE?</p>		<p style="text-align: center;">X</p>	<p>DRC may have adverse impacts on this human right by not enabling employees to meet basic needs in situations of sickness, maternity leave, by disability, or retirement.</p> <p>The Danish welfare model provides for adequate social security in all these areas. However, social insurance in particular in terms of unemployment is continuously under decrease, similar to government covered pension schemes.</p> <p>DRC:</p> <ul style="list-style-type: none"> - All employees, including students, in DRC are covered by an improved health insurance. - Makes sure that all employees are covered by adequate workers compensation by accidents. - Notes that the state provides for universal health insurance available for citizens, secures pensions for elderly citizens, insures people, in case that they cease to be able to work before the age of retirement and provides for basic insurances to employees through maternity leaves. - Keeps an eye on changes in state provided social insurance in order to, in case of coverage reductions, examine possibilities to cover employees through private insurance. 	<p>1. Number of complaints/reports on lacking social insurance.</p>
<p>7a. Risk of potential or actual adverse impacts in relation to THE RIGHT TO PROTECTION OF MOTHERS BEFORE AND AFTER CHILDBIRTH?</p>		<p style="text-align: center;">X</p>	<p>Appreciation of seniority for maternity leave.</p> <p>DRC may have adverse impacts on the right to protection of mothers before and after childbirth by:</p> <ul style="list-style-type: none"> - Neglecting to consider maternity leave when evaluating female workers seniority, possibilities for promotion and in the hiring process. <p>DRC:</p> <ul style="list-style-type: none"> -Ensures that all employees are entitled to leave/ absence in relation to pregnancy, adoption, maternity, paternity and parental leave in accordance with current legislation on maternity and parental leave - - As a condition for providing full salary during any of the leaves, requires that DRC will receive compensation from the public insurance scheme amounting to the maximum of the current unemployment subsistence allowance (dagpenge). - Increases job-flexibility for pregnant people and new parents. - Informs staff members that announce pregnancy, about their rights and opportunities throughout pregnancy and maternity leave. - Ensures that leave won't have any influence on an employee's seniority. <p>DRC will:</p> <ul style="list-style-type: none"> - Update staff handbook and Maternity & Paternity Scheme in DRC in order to address potential adverse impacts on this right. - Review and update all existing employee contracts in relation to this human right. 	<p>1. Number of complaints in relation to impacts on this human right.</p> <p>2. Updated staff handbook and Maternity/Paternity Scheme</p> <p>3. All contracts reviewed and updated</p>
<p>7b. Risk of potential or actual adverse impacts in relation to THE CHILDREN'S RIGHT TO BE FREE FROM CHILD LABOR?</p>			<p style="text-align: center;">X</p> <p>DRC assesses that we are not at risk of having adverse impacts on the children's right to be free from exploitative child labor. Should we engage with persons under 18 merely for light work assisting the office, we will be aware of that risk.</p>	
<p>8a. Risk of potential or actual adverse impacts in relation to the right to adequate standard of living, including THE RIGHT TO ADEQUATE FOOD AND ITS FAIR DISTRIBUTION?</p>			<p style="text-align: center;">X</p> <p>DRC assesses that we are not at risk of adverse impacts on the right to adequate food.</p> <p>We operate where employees will have readily access to food. We do provide lunch for our employees and of course ask our suppliers to meet the standard and address that risk.</p>	

<p>8b. Risk of potential or actual adverse impacts in relation to the right to adequate standard of living, including THE RIGHT TO ADEQUATE CLOTHING?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses that we are not at risk of adverse impacts on the right to adequate clothing. We do not need or require special clothing and only for external business meeting are employees expected to wear business casual.</p>	
<p>8c. Risk of potential or actual adverse impacts in relation to the right to adequate standard of living, including THE RIGHT TO ADEQUATE HOUSING?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses that we are not at risk of adverse impacts on the right to adequate housing. We do not provide employees with housing, and we do not sell, build, finance or rent out housing. DRC is located in an area with easy access through public transportation.</p>	
<p>8d. Risk of potential or actual adverse impacts in relation to the right to adequate standard of living, including THE RIGHT TO WATER AND SANITATION?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses that we are not at risk for adverse impacts on the right to adequate water and sanitation. We always provide plenty of clean drinking water for our employees. In Denmark, there is further access to very cheap and clean drinking water from the tap.</p>	
<p>9. Risk of potential or actual adverse impacts in relation to THE RIGHT TO HEALTH?</p>		<p style="text-align: center;">X</p>		<p>DRC assesses that we may contribute to risk of adverse impacts on the right to health. As part of our support and service to the industry, in particular during Covid-19, we have run campaigns to encourage the public to visit restaurants and cafés. We appreciate that visiting restaurants and cafes during covid-19 may lead to increased risk of becoming infected with Covid-19. For employees, see section under work environment.</p> <p>DRC:</p> <ul style="list-style-type: none"> - Ensures that all communication adequately reflects the many measures expected from the industry in relation to preventing and mitigating the spread of Covid-19. - Spends an extraordinary amount of additional resources advising our members to demonstrate best practice in meeting requirements and expectations from health authorities on Covid-19. 	<p>1. Number of complaints</p>
<p>10. Risk of potential or actual adverse impacts in relation to THE RIGHT TO EDUCATION?</p>		<p style="text-align: center;">X</p>		<p>DRC assesses, that we may be at risk of having adverse impacts on the right to education, as we are looking into the possibilities of establishing an educational framework within the industry.</p> <p>We do not put obstacles in the way for employees, who would wish to participate in education in their free time.</p> <p>If employees attend studies or other educational activities, we will seek to make work time as flexible as possible to accommodate exams etc.</p> <p>DRC will:</p> <ul style="list-style-type: none"> - Ensure a framework that duly appreciates and enhances availability, accessibility, acceptability and quality of any initiative in the industry. - Ensure that potential students will also receive training on responsible business conduct (the UNGPs /OECD Guidelines) 	<p>1. Curriculum established for educational initiative that reflects our commitment.</p>
<p>11a. Risk of potential or actual adverse impacts in relation to THE RIGHT TO TAKE PART IN CULTURAL LIFE?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we may be at risk of having adverse impacts on the right to education, as we are looking into the possibilities of establishing an educational framework within the industry.</p> <p>We do not put obstacles in the way for employees, who would wish to participate in education in their free time.</p> <p>If employees attend studies or other educational activities, we will seek to make work time as flexible as possible to accommodate exams etc.</p>	

11b. Risk of potential or actual adverse impacts in relation to THE RIGHT TO BENEFIT FROM SCIENTIFIC PROGRESS?			X	DRC assesses, that we are not at risk of adverse impacts on the right to benefit from scientific progress. We do not hold patents and we do not develop scientific inventions.	
11c. Risk of potential or actual adverse impacts in relation to THE RIGHT TO MATERIAL GAINS FROM INVENTIONS?			X	DRC assesses that we are not in risk of adverse impacts on the right to material gains from inventions. Even though our employees participate in optimizing the operations, the company is not developing new technologies or products.	
11d. Risk of potential or actual adverse impacts in relation to THE MORAL RIGHTS OF AUTHORS?		X		DRC acknowledges that copy-pasting material without consent from the author constitutes an increasing challenge with the digitalisation of societies. Otherwise, we have a strong culture of recognizing and appreciating the work of our colleagues DRC: - Has a strong focus on ensuring recognition of IP rights of authors both in-house and not least in relation to our members, where we regularly run campaigns in collaboration with relevant organisations, e.g. KODA. - Only uses photo and other material that we have been authorized to use e.g. Stock Photos DRC will: - Explicitly make staff aware that copying of material without appropriate consent from the author will not be accepted in the staff handbook/design manual/communication guidelines.	1. Number of complaints /registered cases of impacts on the moral rights of authors 2. Updated staff handbook/design manual/communication guidelines. (see HR.2)
12. Risk of potential or actual adverse impacts in relation to THE RIGHT TO LIFE?			X	DRC assesses, that we are not at risk of adverse impacts on the right to life, that are not already covered by our efforts to manage adverse impacts on the right to safe and healthy working conditions or the right to health (HR 4c & HR 9). DRC has not experienced work- or service related deaths during the past five years.	
13a. Risk of potential or actual adverse impacts in relation to THE RIGHT NOT TO BE SUBJECTED TO TORTURE, CRUEL, INHUMAN AND/OR DEGRADING TREATMENT OR PUNISHMENT?		X		Employees can be subjected to harassment both from management and colleagues. DRC may have adverse impacts on the right not to be subjected to degrading treatment by: - Failing to secure that employees are not subjected to harassment from their immediate leader or from their colleagues. (We further refer to actions taken with regard to managing adverse impacts on the right to non discrimination - HR2). DRC: - Has engaged and developed elaborate campaigns actively combatting harassment in the industry. DRC will: - Update staff handbook to address potential adverse impacts on this right. - Update framework for employee development talks to explicitly address this challenge.	(See also indicators under 'non-discrimination' - HR 2). 1. Number of complaints/registered incidents of harassment. 2. Score in work place assessment. 3. Updated staff handbook.
13b. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREE, PRIOR AND INFORMED CONSENT TO MEDICAL OR SCIENTIFIC EXPERIMENTATION?			X	DRC assesses, that we are not at risk of adverse impacts on the right to free, prior and informed consent to medical or scientific experimentation. We are not engaged in activities that would make possible adverse impacts on this right.	
14. Risk of potential or actual adverse impacts in relation to THE RIGHT NOT TO BE SUBJECTED TO SLAVERY, SERVITUDE OR FORCED LABOR?			X	"DRC assesses, that we are not at risk of adverse impacts on the right not to be subjected to slavery, servitude or forced labor. We always allow employees to freely leave their job and we do not offer loans to employees.	

<p>15. Risk of potential or actual adverse impacts in relation to THE RIGHT TO LIBERTY AND SECURITY OF A PERSON?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses that we are not at risk of having adverse impacts on the right to liberty and security of a person. DRC does not have security personnel employed or would otherwise seek to hold back persons.</p>	
<p>16. Risk of potential or actual adverse impacts in relation to THE RIGHT OF DETAINED PERSONS TO HUMANE TREATMENT?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses that we are not at risk of having adverse impacts on the right of detained persons to humane treatment. DRC does not have security personnel employed and does not apprehend people. As we do not apprehend people, we are also not at risk of detained people.</p>	
<p>17. Risk of potential or actual adverse impacts in relation to THE RIGHT NOT TO BE SUBJECTED TO IMPRISONMENT OR AN INABILITY TO FULFIL A CONTRACT?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right not to be subjected to imprisonment for an inability to fulfil a contract. Since we operate in Denmark, where this practice ceased many decades ago, we assess that we are not at risk.</p>	
<p>18. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF MOVEMENT?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom of movement. DRC operates in Copenhagen and Odense with easy access to public transportation.</p>	
<p>19. Risk of potential or actual adverse impacts in relation to THE RIGHT OF ALIENS TO DUE PROCESS WHEN FACING EXPULSION (SEEKING ASYLUM)?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right of aliens to due process when facing expulsion (seeking asylum). DRC is not in a business area that would make us in a position where asylum seekers can come in our care.</p>	
<p>20. Risk of potential or actual adverse impacts in relation to THE RIGHT TO A FAIR TRIAL?</p>		<p style="text-align: center;">X</p>		<p>DRC may be at risk of having adverse impacts on the right to fair trial, as DRC represents members as part of trials. As part of our legal advise and representation of members in preparation of and during court cases, we may have adverse impacts on this right by:</p> <ul style="list-style-type: none"> - withholding or destroying evidence of relevance to a court case, giving our members an advantage - unduly postponing court cases without merit primarily for economic reasons. <p>DRC:</p> <ul style="list-style-type: none"> - is committed to manage adverse impacts on social, environmental and economic sustainability in our articles of association. - ensures that our lawyers are very focused on avoiding risks of conflicts of interest when advising members - ensures that all our lawyers fulfil at a minimum the bar requirements for professional continuous education - ensures strict compliance with the ethical standards of the Danish Bar Association - enable our lawyers to reject participation in a court case should the member engage in activities that would constitute adverse impacts on the right to a fair trial - when necessary, recommends reputable law firms to represent the members when outside our area of expertise - instructs our lawyers to consider upholding and maintaining the good representation of DRC as a trusted advisor to all our members when engaging in concrete legal disputes <p>DRC will:</p> <ul style="list-style-type: none"> - update our association's purpose in DRC's articles of association - update website information on DRC's legal advice, explicitly addressing these risks. 	<ol style="list-style-type: none"> 1. Number of complaints/incidents 2. Staff handbook updated 3. Articles of Association updated 4. Website updated

<p>21. Risk of potential or actual adverse impacts in relation to THE RIGHT TO BE FREE FROM RETROACTIVE CRIMINAL LAW?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to be free from retroactive criminal law. Despite discussions in the public on retroactive criminal law with regard to tax- and immigration law, we estimate that our risk of contributing to adverse impacts in Denmark is minimal.</p>	
<p>22. Risk of potential or actual adverse impacts in relation to THE RIGHT TO RECOGNITION AS A PERSON BEFORE THE LAW?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to recognition before the law. Should we have potential adverse impacts in relation to this right, these will be managed as part of our work with non-discrimination; see HR 2.</p>	
<p>23. Risk of potential or actual adverse impacts in relation to THE RIGHT TO PRIVACY?</p>		<p style="text-align: center;">X</p>		<p>Sensitive information, including personal data. DRC may have adverse impacts on the right to privacy by:</p> <ul style="list-style-type: none"> - Collecting and storing sensitive information (personal data) on employees - Not ensuring that people are aware of what the information is used for, how and where it is stored, or how each individual can access the information and, whether they have the possibility to change it (GDPR) - Not adequately informing the employees about our surveillance (internet use, accessing e-mails and telephones, surveillance system, incl. video surveillance in rooms with exit doors) <p>DRC:</p> <ul style="list-style-type: none"> - Ensures compliance with EU's data protective regulation (GDPR): has in place a policy on personal data, conducts regular assessments on risks in relation to handling of personal data for employees and members, has appointed a person responsible for personal data, communicates internally and externally on this matter, links to the public complaint mechanism (Datatilsynet) etc. - allows access to video surveillance footage for two entrusted persons only and only to be used in relation to possible criminal acts (i.e. in case of alarms from security firm) - has clear sign posts indicated video surveillance - has encrypted sticks and messages - computer screens that prevent unauthorised views - ensures that confidential documents are not stored other places than in a secured DRC network. <p>DRC will:</p> <ul style="list-style-type: none"> - Update persondata policy to address potential adverse impacts on this right, making expectations for employees in relation to handling data safety and security clearer. - seek to implement track and trace system on use of access to video surveillance, incl. clear guidelines for access 	<p>1. Number of complaints on impacts on the right to privacy. 2. Update staff handbook 3. Track and trace system</p>
<p>24. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF THOUGHT, CONSCIENCE AND RELIGION?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom of thought, conscience and religion. Should we have adverse impacts on this right, such adverse impacts will be managed as part of our work with non-discrimination (see HR 2.).</p>	

<p>25a. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF OPINION?</p>		<p>X</p>	<p>DRC may be at risk of adverse impacts on the right to freedom of opinion. We value differences of opinion. However as a lobby organisation for our industry, our employees are expected to demonstrate a politically neutral opinion in work related context. Hence in recruitment we will have to take into consideration the capability of our coming employees to appear and act politically neutral.</p> <p>DRC: - During recruitment interviews discusses political areas of importance for DRC (e.g. tax issues, collective agreements, education, CSR) that also involves opinions of the political actors in the areas in which we operate to determine whether the person can relate to and accept DRC political positions.</p>	<p>1. Number of complaints/incidents</p>
<p>25b. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF EXPRESSION?</p>		<p>X</p>	<p>Limitations in relation to statements about DRC and use of social media. DRC may have adverse impacts on the right to freedom of expression by:</p> <ul style="list-style-type: none"> - Establishing unclear limitations for employees' possibilities to express themselves about DRC's circumstances (for example confidential information on DRC): - not clearly describing what and how employees are expected to communicate about DRC on social and public media, - limiting what employees can say to other employees in order to prevent adverse impacts on other rights (see non-discrimination HR2; degrading treatment HR13a) - removing offensive or business unrelated comments from social media controlled by DRC. <p>DRC: - Has in place a well defined duty of confidentiality in employment contracts, limited to confidential commercial information.</p> <p>DRC will:</p> <ul style="list-style-type: none"> - include a focus on this right in staff handbook, stating expectations to public communication incl. social media - inform users of DRC's digital platforms that DRC may delete any comments, i.e. put limitations on their freedom of expression (considering respect of others; business unrelated information, undocumented claims) - Update communication guidelines for unnecessary limitations on this right (see HR 2, right to anti-discrimination). 	<p>1. Number of complaints /registered cases of limitations on the freedom of expression from employees. 2. Staff handbook updated 3. DRC's digital platforms updated ('about'-sections). 4. Communication guidelines reviewed</p>

<p>25c. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF INFORMATION?</p>		<p style="text-align: center;">X</p>		<p>Easy access to necessary information for employees knowledge sharing. While regard should be taken to confidentiality, business secrets and personal information, DRC may have adverse impacts on the right to freedom of information by:</p> <ul style="list-style-type: none"> - Not adequately enabling employees' access to information that is necessary for the employees to appropriately do their work. - Unnecessarily restricting sharing information to the public. <p>DRC:</p> <ul style="list-style-type: none"> - Has an open management culture, where employees are encouraged to ask colleagues or managers if they need information. - Ensures that all new employees receive training for their work, see also HR 3 (right to work - training) - has developed file sharing opportunities through Teams - Engages heavily in public debate about the industry and maintains a position of openness towards the public. <p>DRC will:</p> <ul style="list-style-type: none"> - Update communication guidelines with regard to this right. 	<p>1. Number of complaints on the freedom of information from employees and from external parties.</p> <p>2. Communication guidelines updated</p>
<p>26a. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM FROM WAR PROPAGANDA?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom from war propaganda.</p>	
<p>26b. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM FROM INCITEMENT OF RACIAL, RELIGIOUS OR NATIONAL HATRED?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom from incitement of racial, religious or national hatred. Should we have any adverse impacts on this right, they will be managed as part of our work with non-discrimination; see HR 2 and the right to not be subjected to degrading treatment, HR 13a.</p>	
<p>27. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF PEACEFUL ASSEMBLY?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom of peaceful assembly. Should we or our members experience demonstrations that are not legally announced and held, we will of course seek to assist our members by notifying appropriate authorities.</p>	
<p>28. Risk of potential or actual adverse impacts in relation to THE RIGHT TO FREEDOM OF ASSOCIATION?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to freedom of association. We will not interfere with our employees participation in associations outside working hours. Affiliations with associations that express non neutral political opinions are dealt with in HR 25a.</p>	
<p>29. Risk of potential or actual adverse impacts in relation to THE RIGHT TO PROTECTION OF THE FAMILY AND THE RIGHT TO MARRY?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to protection of the family and the right to marry. We do not wish to interfere with the protection of the family or employees possibilities to marry. Overwork is managed through the right to rest and leisure; see HR 4e, and the right to non-discrimination on the basis of gender through HR2.</p>	
<p>30. Risk of potential or actual adverse impacts in relation to THE RIGHT TO PROTECTION OF THE CHILD AND THE RIGHT TO ACQUIRE A NATIONALITY?</p>			<p style="text-align: center;">X</p>	<p>DRC assesses, that we are not at risk of adverse impacts on the right to protection of the child and the right to acquire a nationality. We do not offer services or sell products for children, why we assess that we are not in any special risk of having adverse impacts in relation to the protection of children.</p>	

31. Risk of potential or actual adverse impacts in relation to THE RIGHT TO PARTICIPATE IN PUBLIC AFFAIRS?			X	DRC assesses that we are not at risk of adverse impacts with the right to participate in public affairs that are not dealt with under freedom of opinion. Although we are a political organisation, we are not a party-political organisation. Should we have potential adverse impacts in relation to this right, these will be managed as part of our work with right to freedom of opinion. We allow employees to participate in public affairs outside working hours without interfering with their right.	
32. Risk of potential or actual adverse impacts in relation to THE RIGHT TO EQUALITY BEFORE THE LAW, EQUAL PROTECTION OF THE LAW, AND RIGHTS OF NON-DISCRIMINATION (SEE HR 2)?			X	DRC assesses, that we are not at risk of adverse impacts on the right to equality before the law, equal protection of the law, and rights of non-discrimination (see HR 2). Should we have potential adverse impacts in relation to this right, these will be managed as part of our work with non-discrimination, see HR 2.	
33. Risk of potential or actual adverse impacts in relation to THE RIGHTS OF MINORITIES (CULTURE, RELIGIOUS PRACTICE AND LANGUAGE)?			X	DRC assesses, that we are not at risk of adverse impacts on the rights of minorities. Denmark has only one group of recognized minorities, namely the German minority in southern Denmark. Should we have potential adverse impacts in relation to this right, these will be managed as part of our work with non-discrimination, see HR 2.	
TOTAL	0	23	31		