

# Design Your Own HREDD Approach



Implemented by



FABRIC Cambodia



**Published by**

Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH

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**Design/layout**

Melon Rouge Agency, Phnom Penh

**URL references**

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On behalf of  
German Federal Ministry for Economic Cooperation and Development (BMZ)  
Division 120 – Sustainable Supply Chains  
Berlin

Phnom Penh, 2024

*This Guide can help you get your organisation ready to implement Human Rights & Environmental Due Diligence (HREDD). It was developed for:*

- 1. Factory Management and senior decision-makers*
- 2. If applicable, persons responsible for Legal and Compliance, Human Resources and/or Operations*

*The Guide focuses on the questions **WHAT** is HREDD and **WHY** you should implement it in your organisation. You will also find an overview of tools and resources that can support you with **HOW** to approach HREDD.*

*There is no 'one-size-fits-all' approach to implementing HREDD. No one can tell you exactly what to do because your organisation has a unique risk profile and only you know what is right for your business. The Guide is not a step-by-step checklist because HREDD is an ongoing process that is never finished, or perfect. And that is ok. The goal is that you develop an approach to HREDD that is right for you, your business and those who could be affected by your operations.*

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# 01

**Getting  
the basics  
right**

# 01

## Getting the basics right

The first part of the Guide focuses on the fundamentals of human rights and environmental due diligence (HREDD). You will read about the benefits of implementing HREDD and which core elements you need to consider. You will also find out more about the legal requirements that shape the expectations and requests you may be receiving from your international buyers. Subsequently, you can explore the concept of shared responsibility and how responsible purchasing practices can improve overall sustainability performance in garment, footwear and travel goods (GFT) value chains.

Whenever you see this question mark next to a term, you can look up the definition in the [Glossary](#) in the end of this document.

<sup>1</sup> Human rights are the basic rights and freedoms that every person has by birth and without discrimination, for example the right to life or freedom of speech. Human rights are closely linked to the environment, such as the right to a clean, healthy and sustainable environment. Labor rights, such as freedom of association or occupational safety and health, are also human rights.

<sup>2</sup> Rights holders are people whose human rights could be negatively affected by business activities.

### 1.1 →

## What is Human Rights and Environmental Due Diligence

Human rights & environmental **due diligence**<sup>?</sup> (HREDD) is a key element of responsible, competitive and resilient business practices. Implementing HREDD can help companies to better deal with **human rights and environmental risk**<sup>1</sup> in their own business operations and along their **value chains**.<sup>2</sup> Legislation, audits and customer expectations reflect the global and growing importance of HREDD. Respecting people and the environment as part of your business will not be new to you, but HREDD asks you to think and act strategically with a focus on the perspective of **rights holders**<sup>2</sup>. This Guide can help you integrate the HREDD lens into your existing work on risks, negative impacts, social compliance, corporate social responsibility (CSR) and more.

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In this Guide, we use the term employees in reference to persons fulfilling (part-time or full-time) any business-related or clerical duties as well as workers performing manual labour.

There are human rights and environmental risks at any stage in the GFT sector. You, your **employees**<sup>3</sup>, communities and suppliers may face different types of risks. These can relate to occupational safety & health (OSH), working hours or waste management among others (more in Part II, Chapter 2). HREDD can help you understand and address these risks and negative impacts to avoid damage to people and the environment but also to your business. It is an ongoing risk management and **accountability system**.<sup>4</sup> To be effective, HREDD needs to be part of the business strategy.

HREDD asks you to do more than just managing risks - it is also about taking accountability for actual negative impacts. Below are some examples of what the difference is between risks and negative impacts:

## Human rights and environmental risks

*The possibility of something bad happening*

Human resources do not check the age of new employees

There is no proper ventilation on the production floor

The factory uses **subcontractors**<sup>5</sup> and **home workers**<sup>6</sup> without any checks

There is no protocol for waste management

There is no effective **grievance mechanism**<sup>7</sup> in place

## Negative impacts on people and environment

*Something bad has already happened or is happening*

A child is working at the factory

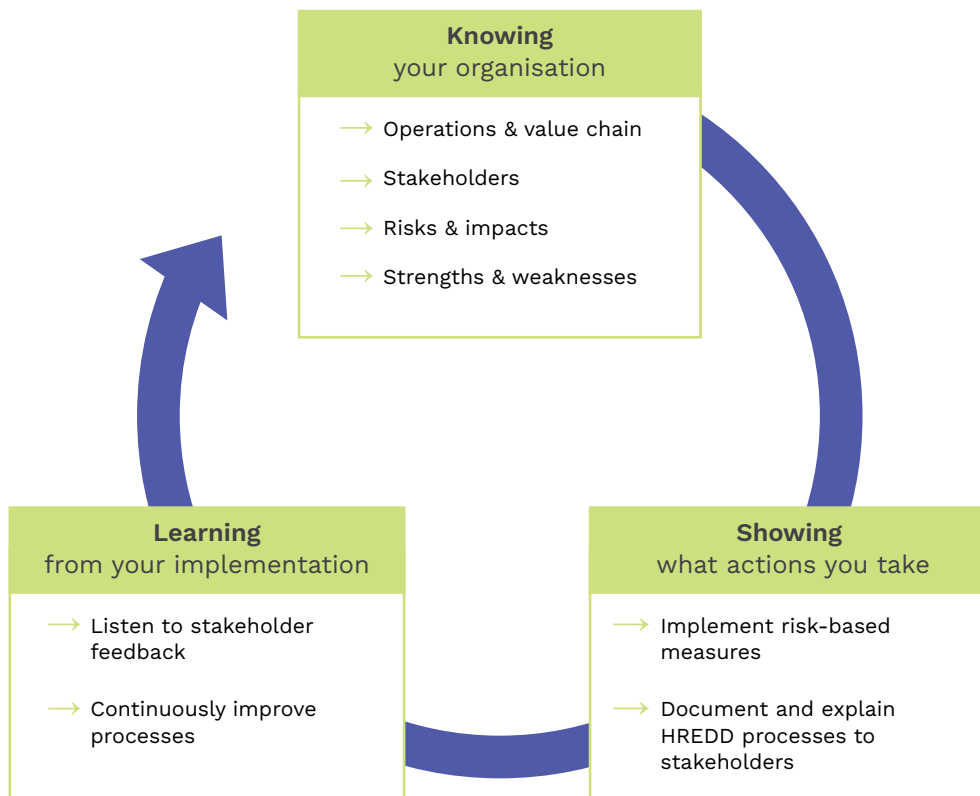
Workers' health suffers from bad air quality and heat stress

Subcontracted workers do not receive minimum wage or social protection benefits

Waste is burned or dumped uncontrolled and causes pollution which affects the communities

Labour disputes are not addressed and protests occur

Ultimately, HREDD means *knowing* your organisation, its risks and impacts, *showing* what you do to address them but also where your challenges are, and *learning* from your implementation and your **stakeholders** by using their feedback to continuously improve your risk management processes.



In fact, you might already be familiar with the concepts ‘responsible business’, ‘sustainability’ or ‘Corporate Social Responsibility’ (CSR). CSR is a good starting point but HREDD goes further and deeper (see overview below). Your organisation might already be implementing measures under the CSR concept and this Guide can help you streamline them into an HREDD approach.



## Corporate Social Responsibility

## Human Rights & Environmental Due Diligence

Often stand-alone initiatives

Embedded in business operations and strategy

Mostly voluntary

Increasingly legally mandatory

Defined by company

Determined by risks to people and the environment

Focus on desired outcome

Focus on ongoing process and preventing negative impacts on people and the environment

Considers elements of business operations, such as manufacturing, to improve selected aspects

Considers the entire value chain to improve overall working conditions, respect for human rights and environmental protection

Takes on perspective of decision-makers and investors

Takes on perspective of rights holders

You can build on existing processes and initiatives but integrate an HREDD perspective. Expanding existing processes or developing new ones might require additional resources or costs but you will ultimately benefit from a stronger and more competitive business. You can view it as an investment into a better, more resilient organisation.

### *The RBH can support you*

If you want to learn more about HREDD or need support in some of the steps and measures outlined in this guide, you can reach out to the Responsible Business Hub (RBH) Cambodia for further support. The RBH is a service helpdesk that provides tailor-made, free of charge information and advisory services around due diligence to assist local businesses that want to step up their sustainability performance and meet the growing requirements in the field of HREDD.

<https://rbh-eurochamcambodia.com>



## 1.2 →

# How does implementing HREDD benefit you

- Maintain your licence to operate by preventing human rights violations and environmental issues, and providing **access to remedy**<sup>2</sup> to those who were affected.
- Create basis for a growing, resilient, sustainable and ethical business model with good working conditions.
- Strengthen your reputation as a supplier and employer of choice by pioneering good practice and be a model to peers.
- Retain market access by meeting buyers' requirements but do so in a scalable and meaningful way instead of just 'ticking boxes'.
- Remain competitive as expectations on factories to understand and implement HREDD increase.
- Build trusting, committed and long-lasting relationships with your employees, their representatives and unions to increase morale, retention and healthy collaboration.
- Benefit from more resilient supply chains and production planning by reducing absenteeism and employee turnover.
- Avoid reputational damage, fines, lawsuits, loss of customers or disruptions of the production process.
- Collect and manage data concerning people and the environment to better understand and improve your business operations.
- Regulation is evolving and expanding - get ready for possible future laws.

“  
*We included HREDD-related factors as **Key Performance Indicators (KPIs)**<sup>2</sup> in our supplier assessment process to show factories that good working conditions are as important to us as buyers as overall factory performance.*”

**International buyer**

# Addressing risks improves working conditions

## and saves money

Studies in the United Kingdom show that for every 1 USD companies spent on improving occupational safety & health (OSH) processes they saved up to 9 USD. Better OSH processes reduce injuries and work-related illness which lead to long term health problems, absences and reduction in productivity. <sup>1</sup>

### 1.3 → Core elements of HREDD

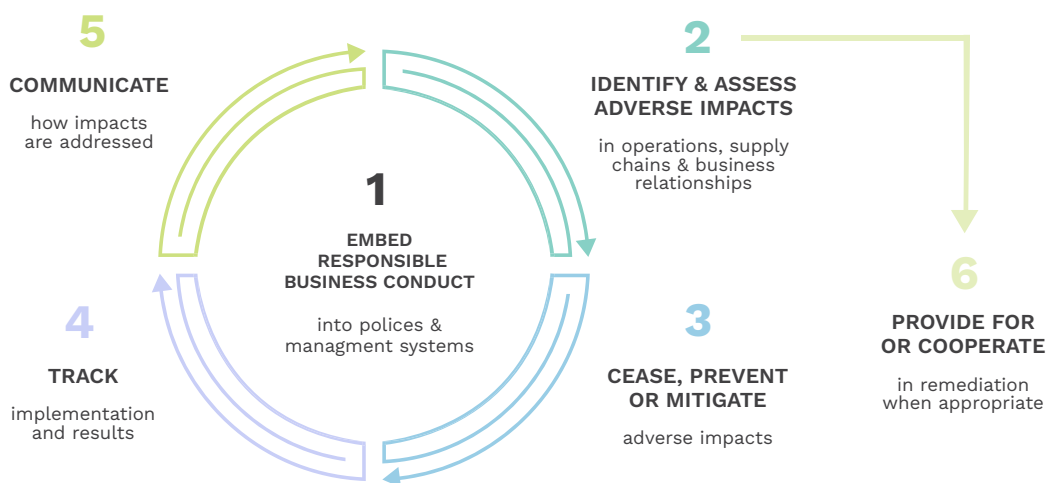
Viewing your risks and negative impacts through the HREDD lens will help you manage them more effectively and make sure you continuously improve your processes. Your organisation might be more advanced in some areas and might need more work in other areas of HREDD.

HREDD is based on the principles outlined in the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and more specifically for the GFT sector in the OECD Due Diligence Guide for Responsible Supply Chains in the Garment and Footwear Sector <sup>5</sup>. The OECD developed the below due diligence cycle to illustrate the concept of HREDD.



Whenever you see this book icon, you can see more information in the Annex in the end of this document.

<sup>5</sup> Take a look at these resources in the Annex - if you use them as guidance you will be very well equipped to fulfill HREDD related expectations!



Source: OECD Due Diligence Guide for Responsible Business Conduct.

The table below dives deeper into the HREDD core elements that are needed to implement due diligence. You will find visual references to individual or multiple of the below HREDD elements throughout this document, as well as several [resources and tools](#) at the end of the Guide that provide you with concrete implementation support.



## Integration

### What does it mean?

Ensure senior management commitment, allocation of resources and adequate training; assign responsibilities for HREDD and develop a policy committing to respect human rights and protect the environment; combine and build on your existing processes such as OSH policies, CSR committees or hiring procedures to integrate HREDD across the business to ensure human rights and environmental risks are identified and addressed holistically and continuously.

### Why is it necessary?

For HREDD to work it needs to be embedded in day to day decision-making and become part of the business strategy and management mindset.



## Risk Assessment

### What does it mean?

Identify and understand human rights and environmental risks linked to your business operations and value chains.

### Why is it necessary?

Use your resources to focus on managing the most **salient risks** in your organisation and among your suppliers and business partners.



## Risk Mitigation

### What does it mean?

Prevent and **mitigate** identified risks so that they do not result in actual negative impacts by planning and implementing effective measures to address risks.

### Why is it necessary?

Preventing negative impacts on people and environment will create better working and living conditions; prevention is easier than dealing with problems when they already happened.



## Grievance Mechanism

### What does it mean?

All employees and stakeholders linked to your operations and value chains need to be able to let you know about issues and concerns, if they wish anonymously, without any fear of discrimination or retaliation.

### Why is it necessary?

You can only fix problems if you know about them, and people need to feel safe to report them and know that you will do your best to find a solution.



## Remediation

### What does it mean?

If negative impacts on people or the environment already happened, you need to take steps to stop the negative impact and find a solution to restore people and the environment as far as possible to the situation before the impact occurred.

### Why is it necessary?

If done well and in good faith remediation can avoid further escalation such as lawsuits or strikes; you may also be legally obliged to provide access to remedy.



## Training

### What does it mean?

Carry out regular training tailored to the different needs of your managers, supervisors or workers; different departments might be exposed to different risks or have different responsibilities; new employees might need to be made aware of all processes while existing employees need to be updated regularly.

### Why is it necessary?

Training supports the integration and communication of HREDD processes by ensuring employees know what they need to know about their rights and responsibilities and can apply processes effectively.



## Monitoring & Evaluation

### What does it mean?

Invite feedback from your employees, their representatives and other stakeholders; you can also define and compare Key Performance Indicators (KPIs) to make sure your HREDD processes deliver the desired result.

### Why is it necessary?

HREDD is never finished, it is an ongoing process - and you need to know what is working and what is not to change and improve.



## Stakeholder Engagement

### What does it mean?

Engage with rights holders and other stakeholders, incl. employees and their representatives, trade unions, communities, NGOs, and government agencies to understand and deal with issues and concerns and jointly design adequate responses.

### Why is it necessary?

HREDD processes aim to reduce negative impacts on people and the environment - your stakeholders, especially rights holders whose rights might be affected, know best what the (potential) problems and solutions are.



## Communication

### What does it mean?

Share information about your HREDD processes such as your risks, measures taken and investigations into reported grievances and their remediation; this can be achieved e.g. by publishing regular updates (ranging from a simple leaflet to a comprehensive report), communicating with your buyers and sharing information directly with people affected by your operations.

### Why is it necessary?

Transparency builds trust and your stakeholders, including buyers, will see that you take HREDD seriously.

## 1.4 →

# Sharing responsibility for people and the environment with buyers

*No factory is safe from accidents, differences of opinion between workers and management, or individuals treating others in a way that is not ok. Everyone, including buyers, know this. This means that visible commitment to HREDD and, above all, transparency are key to building the trust that enables a successful business relationship.*

**International buyer**

In recent years, many countries across the world started to adopt action plans and legislation to make HREDD mandatory for companies. Cambodia also ratified many international legal instruments that promote workers' wellbeing and protect the environment <sup>1</sup>. All HREDD laws are based on the same principles and guidelines we discussed above.

## HREDD laws encourage collaboration

The EU Corporate Sustainability Due Diligence Directive (CSDDD) and the German Act on Corporate Due Diligence Obligations in Supply Chains specifically state that companies that need to comply with the law and implement HREDD should collaborate with their suppliers. The German government published a Guidance <sup>2</sup> that explains how companies need to deal with resources and costs needed for HREDD measures. Buyers in scope of the law cannot simply pass on responsibility to their suppliers but need to support them in addressing human rights and environmental risks and negative impacts.

The more you know and show, the better buyers can understand and support your business and HREDD efforts. The laws emphasise **shared responsibility** <sup>3</sup> between buyers and suppliers for respecting human rights and protecting the environment. At the same time, buyers are under pressure to comply with the laws and need their suppliers to understand HREDD. If factories don't make an effort to implement HREDD, it can become a problem for buyers.

Here are some examples of how buyers and suppliers can share responsibility for implementing effective HREDD processes:

- Buyers should not only send their Code of Conduct to their suppliers and expect them to comply but offer free training on how to jointly implement its requirements
- If an audit carried out by a buyer found issues at the factory that could endanger people or the environment, the buyer should work together with the factory to implement necessary changes and, if necessary, share costs appropriately
- Joining a multi-stakeholder initiative can facilitate collaboration and help buyers and factories work together on concrete goals



*We work closely with our suppliers to identify key social and environmental risks and guide them on where to concentrate their efforts. This focused approach ensures that resources are wisely invested where they matter most, ensuring long-term sustainability and commitment to the betterment of people and our planet.*

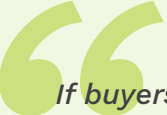

**International buyer**

While Cambodian manufacturers are not directly bound by HREDD legislation, many international buyers are in scope of laws that require them to conduct HREDD. This is why you might be affected indirectly. Buyers have to go through the same core elements of HREDD listed above to understand possible risks and negative impacts linked to their operations and value chains. As their supplier, you are part of their direct supply chain. This means you might be getting requests from buyers who want to know more about how you deal with human rights and environmental risks.

Another crucial aspect of shared responsibility covered in HREDD laws are **responsible purchasing practices**.<sup>7</sup> This means that any organisation buying from another should consider its impact on the other business. The Multi-Stakeholder Initiative Working Group on Responsible Purchasing Practices developed the Common Framework for Responsible



Purchasing Practices  which identifies five core principles that constitute responsible purchasing : Integration and Reporting; Equal Partnership; Collaborative Production Planning; Fair Payment Terms; and Sustainable Costing. Considering these principles ensures that organisations assume responsibility for how their buying processes may affect people and the environment, and take action to reduce risks and address issues together. You can use the Common Framework to enter into discussions with your buyers about their purchasing practices and the impacts they might have.

 *If buyers are really serious about HREDD, they should invest more in it and pay more for products they are buying – not just put the cost on suppliers, knowing that to increase the effective implementation of HREDD they cannot just rely on suppliers. Brands need to also monitor the progress, making sure that if they are helping out a supplier, they should find a way to help their supplier to address human rights and environmental issues.* 

**Labour rights NGO**

Let us remember that HREDD is flexible and different from factory to factory. It has to be tailored to your risks to people and the environment and it has to make sense to you - then it will also make sense to your buyers. If you receive requests from your buyers related to HREDD that do not fully align with your own risk profile or which do not make sense for your organisation, speak to your buyer and their HREDD team to explain your position. If you plan on improving your grievance mechanism or your environmental management system - why not ask them for capacity-building or financial support?

# 02

**Design  
your own  
HREDD  
approach**

# 02

## Design your own HREDD approach

This part of the Guide dives deeper into how you can get started to implement HREDD in your organisation - from understanding existing processes to identifying and prioritising your risks to making a strategic plan for improving your approach. The individual chapters introduce different HREDD topics and suggest exercises you could try in **GO AHEAD** sections. You might already be doing many things to address risks for people and the environment. Now is the time to integrate your processes, align them with the HREDD logic and make them more effective with a long-term view.

Before you can make a plan to implement HREDD, take a step back to understand your organisation and value chain within the context of human rights and the environment. The process of designing your own HREDD approach is iterative and needs to be tailored to your organisation. It is similar to designing, sampling, producing and updating a garment. *This visual comparison will guide you through the next chapters.*

### 2.1 →

## Understand your organisation

*Imagine a blank piece of paper and use the information you get as inspiration to start the design process. What would you like the result to look like? What material do you already have at hand and what do you still need to source?...*



## GO AHEAD

## Understand your existing HREDD infrastructure

**Key result: First understanding of your status quo and possible gaps which can be used as a baseline for your HREDD implementation plan.**

Below are examples of departments in your organisation you should talk to and of questions you could ask. Asking these questions can help you map what you are already doing that covers HREDD core elements ([see Part I, Chapter 3](#)), what you still need to do and where your organisation wants to go. It will also help you understand your organisation better from the perspective of people and the environment linked to your operations.

For HREDD to work, many functions of an organisation need to play their part individually and together. It is very important that the person who asks and analyses the questions is well placed to do so. You might have to set up a working group led by an employee or employees responsible for human rights and environmental topics. The outcomes, including potential issues or challenges, need to be presented to and discussed with factory management.

Please note that these are just examples and not exhaustive - the questions you actually ask have to make sense for your organisation. Some questions have an indirect link to people and the environment, some are more direct. Add your own questions to the list or delete the ones not applicable to you. Make sure to write down the responses.

The below questions are all linked to one or more of the HREDD core elements we introduced in [Part I, Chapter 3](#). The icons show you which element each question is linked to most.

## Management

What policies do you have in place to ensure your organisation respects human rights and protects the environment?



Did you receive any feedback on topics related to people and the environment from your employees, buyers or other stakeholders?



How do you manage requests or expectations from buyers related to HREDD?



Are you aware of the main findings of recent audits and related **Corrective Action Plans (CAPs)**? What do they tell you?



Do you publish information concerning people and the environment or share it proactively with stakeholders?



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## Human Resources

What kind of training do you conduct for new employees? What training do you conduct regularly for all employees? Does training include content related to human rights and/or the environment?



How do you assess employee performance and provide feedback? How do you ensure fairness in the performance review process?



Is there a process for employees and stakeholders to report grievances, concerns or conflicts? How do you handle these reports?



How do you engage with employee representatives and/or trade unions?



What measures do you take to ensure diversity and inclusion and to avoid discrimination in the workplace?



How do you check the age of employees to ensure minimum working age limits are respected?



How do you ensure timely and correct payment of wages?



What measures do you have in place to avoid and address excessive working hours?



Do you provide additional support or non-financial benefits to employees such as childcare, subsidised meals, transportation, etc.?



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## Legal / Compliance

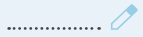
How are you keeping up to date with legal requirements related to people and the environment?



How do you process HREDD requirements from buyers based on legislation they are subject to?



How do you check your business partners' and suppliers' integrity and performance related to human rights and the environment?



## Production planning

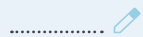
How do you communicate expectations regarding quality and lead times to employees? How do you take their capacities into account?



How do you consider wages and working hours when trying to minimise production costs while maintaining quality?



How do you assess the production capacity of your suppliers to ensure people and the environment are not negatively impacted by your expectations?



## Operations

What occupational safety and health (OSH) processes are in place? How are they communicated to employees?



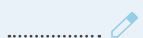
How do you measure the effectiveness of OSH processes?



How do you implement environmental sustainability practices such as accounting greenhouse gases, managing waste and water use?





How do you consider the perspective of people potentially affected by environmental impacts?



Look at your findings and at the list of HREDD core elements in [Part I, Chapter 3](#). The below questions can help you dive deeper to analyse your existing processes further and define next steps:

- Which HREDD elements can be improved?
- What do I already know about my risks and impacts?
- How do I include the perspectives of my employees and their representatives?
- What resources and information do I have to design, implement and improve my HREDD processes?
- What financial and human resources do I have and what additional support do I need?

Add your thoughts and analysis to your documented findings. The results are part of the information you need to develop your HREDD implementation plan (in [Part II, Chapter 3](#)). For the plan to be comprehensive and targeted, you also need to know how to identify and prioritise your risks (see next chapter). After that, we will look deeper into defining meaningful measures and next steps.

It is very important that as factory management you clearly say that you are committed to identifying and addressing your risks and impacts on people and the environment.   You could schedule an employee assembly to explain that the organisation is implementing HREDD and that you will provide the support and resources necessary. You should also encourage and invite your employees to get involved in the process by approaching the colleagues that are responsible for HREDD and share their ideas, questions or concerns.

## 2.2 → Identify, prioritise and continuously review your risks

*...Build on your initial idea to add details to the design you have in mind. What fabric would you choose? Which trimmings would work best for the garment? The result is coming into focus and it includes different elements that make it unique...*



As you progress in understanding your organisation, you also need to understand the human rights and environmental risks related to your organisation and its value chain. Every sector in every country has its own risks related to human rights and the environment. Usually, factory risks will be a selection of sector and country risks. Each factory has their unique risk profile. Some risks need to be addressed with a higher urgency than others. You need to decide what to deal with first, second, third, etc. because you cannot focus on every issue at the same time (more on how to prioritise below). 🔍



For example, there might be a general risk of not paying the minimum wage in the sector. It does not mean that every factory does not pay the minimum wage. But some factories indeed do not. They should focus on that problem.

Another example would be hazardous waste management. It might not be a big problem for the whole sector but some factories have issues managing their hazardous waste. They should focus on that problem.

## GO AHEAD

### Analyse your risks regularly

**Key result:** Learn what information and input you can use to better understand your risks.

To identify and understand your factory risks you need to conduct regular risk assessments. The aim is to uncover how your business activities or relationships could lead to harm to people and the environment. There are many different internal and external sources of information you can take into account (see examples below). The more meaningful information you collect, the more accurate your risk assessments will be. Your factory risks might change over time which is why it is important to review them on an ongoing basis. For example, you can assess your risks every year or whenever you receive reports from your stakeholders about risks you were not aware of. You can use resources and tools listed in the Annex [to find out more and develop a suitable risk assessment process for your organisation.](#)



### Internal sources of information

- Employees, their representatives and trade unions
- Reported grievances or concerns
- Subject matter experts, e.g. occupational safety and health manager, security manager, environmental manager
- Any previous internal assessments
- Observations from visits of suppliers

### External sources of information

- Research and statistics published by NGOs or government agencies
- Industry associations
- Consultancies or experts specialising in HREDD
- Sample risk assessment tools
- Audit results, e.g. from buyers

Different research <sup>4.69</sup> shows the presence of 15 sector risks in the Cambodian GFT industry namely freedom of association and collective bargaining, occupational safety and health (OSH), wage and remuneration, gender-based violence and sexual harassment, child labour, forced labour, labour conditions (contracts, working hours), corruption, greenhouse gas emissions, climate change, water use, water availability, water contamination, waste, and hazardous chemicals.

The below 5 issues are a selection of **sector risks** that are currently particularly relevant for the Cambodian GFT industry based on feedback from stakeholders engaged for the development of this Guide.

## Freedom of association



Employees may be refused their right to form or join a union or other type of workers representation to collectively voice their opinion or negotiate working terms and conditions, or face discrimination if they do.

## Occupational safety & health (OSH)



Factories might not have adequate OSH management and monitoring systems in place which can lead to accidents and injuries. Employees might not receive adequate training on safety procedures, placing them at risk of accidents and long-term health problems.

## Gender-based violence and discrimination



Women make up the majority of the Cambodian GFT industry workforce but they often face sexualised violence, harassment, and unfair working conditions, such as lower wages and discrimination in career advancement.

## Waste management



Garment production generates a lot of waste, including fabric scraps, plastic, hazardous waste and wastewater, which can cause environmental damage if not appropriately managed. Disposal methods such as landfilling or burning can have a detrimental effect on the environment and people's health.

## Subcontracting and short-term contracts



Subcontracted workers are typically employed on a piece-rate basis or doing high-season work in subcontracting factories. Short-term contracts affect job security and access to social protection, representation, minimum wage or other labour rights. Subcontracting can put workers in vulnerable situations where bad working conditions are more prevalent and less visible.

It can be daunting to address all identified risks at once. When you need to prioritise your identified risks you should apply the criteria of '**Likelihood**' and '**Severity**' which can help you decide where to focus.

## Likelihood

Likelihood means the chance or probability of the risk you found causing a negative impact on people or the environment. In other words, likelihood tells you how probable it is for something bad to happen to people or the environment.

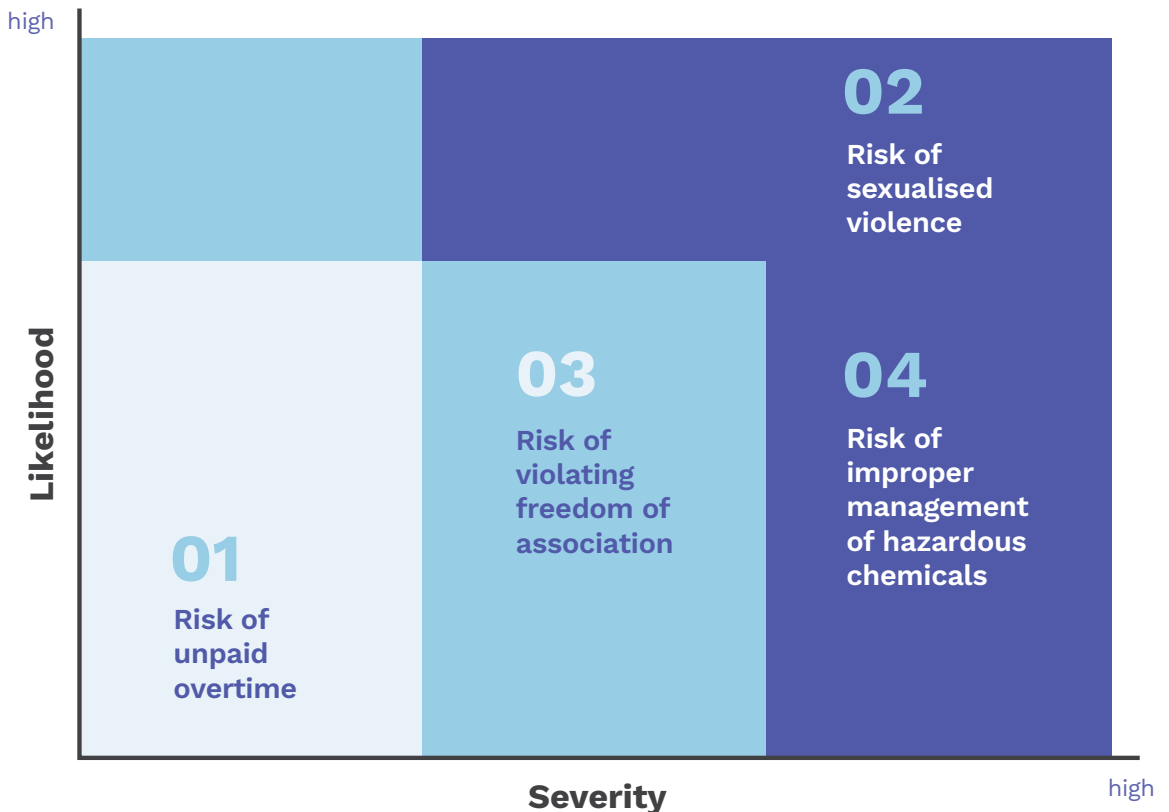
How likely is it that the negative impact on people / the environment actually occurs?

## Severity

Severity means the extent or seriousness of the negative impact. In other words, severity tells you how bad the consequences of something happening can be - seen from the perspective of the people or the environment affected.

How widespread would the impact on people / the environment be? How grave or serious would the impact be? How difficult would it be to put right the harm?

Severity and likelihood are unique to each case and risk. They can therefore not be generally assessed across all sector risks. Below is an example of four risks and how they can be assessed for severity and likelihood at factory-level. The shades of blue represent the respective priority levels.



## 01 Risk of unpaid overtime

### Likelihood - Low

This type of incident generally occurs in the sector but did not previously occur / was not reported at the factory

There is a robust timekeeping system in place at the factory

Control systems can be improved based on learnings

### Severity - Low

Expected to happen only in isolated cases

It is easy to put right the harm by paying outstanding wages to the affected employee immediately

Affected employee would not suffer long-term consequences

## 02 Risk of sexualised violence

### Likelihood - High

Incidents related to gender-based violence were previously reported in the sector and in the factory

There is no robust policy and process in place to prevent such incidents

The risk of this type of incident is not yet acknowledged by the managers and supervisors

### Severity - High

Incident could potentially affect a group of employees

It is difficult, if not impossible, to put right the harm once violence already occurred

Affected employees could suffer long-term health problems

## 03 Risk of violating freedom of association

### Likelihood - Medium

Restrictions on forming a union generally occur in the sector

There is a factory policy stating that employees can form or join a union

One employee previously claimed that they were discriminated against because of their union membership

### Severity - Medium

Violations could potentially affect a group of employees

The harm could be put right over time as previously affected employees form or join unions

Affected employees could experience discrimination, intimidation or other negative consequences

## 04 Risk of improper management of hazardous chemicals

### Likelihood - Medium

Incidents involving hazardous chemicals generally occur in the sector

There is a standard operating procedure (SOP) at the factory to manage hazardous chemicals

The factory lacks specialists and monitoring mechanisms to ensure the SOP is implemented properly

### Severity - High

Violations could potentially affect a group of employees

It is difficult, if not impossible, to put right the harm if peoples' health or the environment has been irreversibly damaged

Affected employees could suffer longterm health problems

As you continuously understand your organisation and your risks, you will also get a better idea of how to address them in a more systematic way. Prioritised, salient risks need to be addressed first and may require the most resources. Over time, all identified risks need to be met with adequate measures. This process will form part of your HREDD implementation plan which we will discuss in the next chapter.

### 2.3 →

## Address your risks and build your HREDD implementation plan

*...You start sketching your garment, adding and erasing details as you go. You might need to change your design if a certain fabric or trim needs to be replaced before your design idea goes into production. First you make a sample to check the outcome and adjust the grading. Once you are happy with the result you start the manufacturing process...*




## GO AHEAD

### Deal with your factory risks

**Key result: Reflect on how to define and develop adequate and effective measures to deal with your identified risks.**

As you identify and prioritise your risks, you should develop concrete measures to deal with these on an ongoing basis. Questions you should consider when developing measures for your own prioritised risks include:


- What is the root cause for the risk? Is it lack of knowledge, lack of procedures or tools, external factors, etc. This is where you need to target your measures.
- What is our main goal, what would we like to change or achieve?
- Are measures in place that could be improved? Or are new measures needed?
- Which internal and external stakeholders need to be involved to effectively address the risk?
- Who is driving the development and implementation of the measures? Make sure to set clear roles and responsibilities, timeline and **SMART goals**?
- How much time do we need to reach our goal?
- What kind of financial support or investment do we need to develop and implement the measures? Can our buyers support us with this?
- How would we know that our measures were effective? How can we monitor and evaluate the measures over time to adjust and improve them as needed?
- Are there any potential challenges or roadblocks? How should we minimise them?

Capture your ideas for potential measures in writing. In the Annex  you will find a template for the HREDD implementation plan where you can include and further define these ideas and the necessary next steps.

## Example of how a factory implemented training as a measure

A Cambodian GFT factory started with the roll-out of training to ensure employees are aware of their rights and relevant processes in place. The steps they took included:

- Selected topics based on risk assessment and employee feedback that are relevant to their employees such as labour law compliance and OSH
- Collaborated with experts on human rights and environment to develop training content
- Designed the training program in modules to cater to different roles
- Incorporated interactive elements such as case studies and simulations

Below are three examples of how factories can approach selected sector risks, listing a range of measures they could take. You can use them for inspiration and you need to make sure your measures make sense and work for your organisation. You will find more examples of concrete measures in the template for the implementation plan in the Annex .



## Freedom of association and collective bargaining

“It is important to see trade unions as partners in HREDD, to understand how employers and trade unions can work together. But also how they can lobby together to improve HREDD. It is an opportunity for both factory management and trade unions to improve working conditions.”

### International trade union organisation

- Firstly, it is important to understand that you all want the same thing - a successful business where employees are proud and happy to work.
- Try to find a constructive way to engage with employees, their representatives and/or unions by creating an open atmosphere.
- Organise an employee assembly and clearly say that all workers are allowed to form a union or join any union they want.

- Employees should receive appropriate time allocated for union meetings.
- Employees that are union members cannot be discriminated against.
- Commit to regular meetings with employees, their representatives and/or unions - the exact stakeholders will be different at every factory.
- Enter into a collective bargaining agreement or a bilateral agreement with unions to elevate industrial relationships.
- Set up a joint decision-making group or committee. You can start with easier topics, for example which food is served in the canteen. You can then move on to topics that are more complicated but important to your employees. For example, transportation to work, breaks and overtime, ventilation, or working hours during hot weather. The specific topics will be different at every factory.
- There might be several unions represented in your factory and it can be difficult to include all opinions - work on feasible solutions together.



## Waste Management

“ We are willing to comply and follow the regulations related to waste management, but we also need a proper policy and support from other stakeholders, such as workers’ representatives and trade unions. ”

### **Cambodian GFT factory**

- Conduct an assessment to identify types and volumes of waste and categorise them appropriately.
- Optimise pattern layout, manage inventory efficiently, and train employees on waste reduction.
- Comply with the local waste and environmental regulation and collaborate with official waste management companies. Try to find waste disposal methods that create higher value than burning and landfilling by aiming for recycling solutions, especially for fabric scraps but also plastic, paper etc.



- Conduct regular training on waste management; engage employees in feedback sessions to understand operational challenges and opportunities better. The training could include:
  - Understanding waste types: Understanding the differences among various types of waste, including general, recyclable, hazardous, electronic, and organic waste is essential for effective waste management.
  - Hazardous waste handling: Properly managing hazardous waste, including its identification, handling, storage, and disposal.
  - Waste management regulations and compliance: Ensuring that waste management practices are environmentally sound and legally compliant.
- Regularly track waste management outcomes, report to stakeholders, and adjust practices based on feedback.
- Collaborate with certification organisations and other businesses to share good practice and useful resources to collectively improve waste management systems.



## Subcontracting and short-term contracts

“Given working conditions and respect for fundamental labour rights, especially freedom of association, are typically worse in subcontractor factories, it is important that an ongoing transparent monitoring mechanism is put in place by both main manufacturers and international buyers to monitor performances of subcontractor factories in their global supply chains, in particular unauthorised ones.”

### **Trade union**

- Discuss your capacities openly with your buyers to forge a long-term and stable business relationship, with clear and realistic production planning.
- Communicate timely and effectively with your buyers and employees on orders and production requirements and any changes.

- Retain your employees by applying long-term or unlimited employment contracts to increase productivity and maintain your production capacity.
- When working with subcontractor factories, make sure to apply responsible purchasing practices such as paying them in full and on time to avoid negative impacts on their workers.
- Publicly disclose information about and list your authorised subcontracts to registered factories.
- Make an explicit commitment to not use unauthorised subcontracts or unregistered factories that could cause harm to employees.
- Require and encourage your subcontractor factories to enable their employees to establish representation and join or form a union, and listen to their concerns on a regular basis.
- Introduce and implement a policy to encourage subcontractor factories to guarantee labour law compliance and protection of workers' rights, especially women workers.
- Discuss with your subcontractor factories challenges and potential risks as well as how to support them to comply with minimum labour standards at the workplace, including capacity-building based on their needs.
- Champion and incentivise subcontractor factories with good practices and compliance with human rights and environmental protection. For example, by placing an increased volume of orders to subcontractor factories with a good record of human rights and environmental performance.

Building on your initial assessment of the status quo (in [Part II, Chapter 1](#)) and a better understanding of your risk assessment processes and possible risk-based measures, you can now determine your current overall HREDD implementation level. This can help you decide what you need to change or add to improve your HREDD processes and create an implementation plan based on the results. Below, you can find an overview of possible HREDD implementation levels within organisations. These are general examples that can help you determine your own level, find your gaps and develop the necessary next steps to progress.

## Launched



Management communicated commitment to HREDD



Fundamental policies, e.g. OSH, are in place



First risk assessment of own operation carried out and main risks found and understood



Plan to address risks in place with clear roles and responsibilities assigned



Foundational grievance mechanism in place, such as complaints box or designated employee



Negative impacts are addressed when they occur

## Established



in addition to Launched



Management engages in regular and ongoing dialogue with employees/their representatives



HREDD policies and processes are documented and available/communicated to employees



Risk assessments are carried out involving employees and other stakeholders at least once a year



Suitable KPIs are used to measure progress and effectiveness of HREDD measures



Direct suppliers have been mapped and potential risks identified



Anonymous, safe and accessible grievance mechanism in place for internal and external stakeholders

## Integrated

in addition to Established



Training programme for employees on their rights rolled out to new and existing employees



(Digital) data management system is in place to collect and analyse information concerning people and the environment



HREDD approach has been developed and shared with employees and external stakeholders



Risks, impacts and progress is reported publicly on a regular basis



Risks are assessed covering direct suppliers and deeper in the supply chain for known risk areas



Programmes are in place to mitigate identified risks



Effective and transparent process for handling grievances and providing access to remedy in place

## Leadership

in addition to Integrated



Factory management proactively requests feedback and improves working conditions based on employees' needs



Stakeholder engagement process in place to build relationships to contribute to sector initiatives



Responsible sourcing strategy is in place to support own suppliers in implementing HREDD and assess their progress



Factory regularly, at least annually, discloses detailed information about their HREDD practices, incl. risk assessment outcomes, risk mitigation measures, remediation cases, KPIs, and more

## GO AHEAD

## Assess your HREDD implementation level

**Key result:** Understand which level you are at and where you would like to get to.


Review the notes you took during the previous **GO AHEAD** exercises, especially those relating to Understand Your Organisation ([Part II, Chapter 1](#)). Based on the information you collected so far and the review of the HREDD implementation levels above, you can evaluate each HREDD core element (see descriptions in [Part I, Chapter 3](#)) and determine which level (launched/ integrated/ advanced/ leadership) describes your current implementation best. Please note, that this is not an exact science - pick the level that feels most appropriate to where you currently stand. Based on this exercise, you can find out your current implementation level. You can also note down your desired implementation level. This will help you understand where you stand and what your next steps could look like to progress towards your desired implementation level. You can review your level from time to time as you progress on your HREDD implementation journey.

It is important to note that reaching a certain implementation level does not mean that your HREDD processes are complete or finished. Maintaining a certain level also requires continuous effort and updates as needed. The levels are a tool to help you develop a plan but they are only one part of your overall HREDD strategy that should continuously evolve with your organisation.

## GO AHEAD

## Define your next steps

**Key result:** Create an implementation plan to respond to your risks and improve your HREDD approach.

You can use the template in the Annex  to develop and track your HREDD implementation plan. It covers both measures to address certain prioritised risks and overall measures to improve your HREDD approach. For example, you might have learned through the exercises that your grievance mechanism needs improvement or you want to go ahead and implement a concrete measure to address a risk you identified. The template helps you define the objectives, activities and responsibilities to implement the necessary changes and keep track of the progress. Your plan needs to remain flexible and you might have to amend it regularly as your HREDD implementation matures.

Someone needs to take the lead to develop, implement and continuously improve HREDD processes in your organisation and steer the HREDD implementation plan. At the same time, many departments might have to work together. Everyone has to understand their roles and responsibilities. To achieve this, you might need to change how much time employees spend on different tasks. You might also have to hire new employees and/or get help from external consultants. HREDD cannot be done as an additional extra task. The person(s) responsible for HREDD in your organisation must receive training to gain knowledge and expertise on this topic. They need tools and resources to do a good job. For example, there is online training available through the Cambodian Garment Training Institute (CGTI) or the OECD you can use .

There are different ways to coordinate your HREDD work and you can often build on existing structures. Here is an example of how a Cambodian GFT factory approached it.

## Example of how to steer implementation

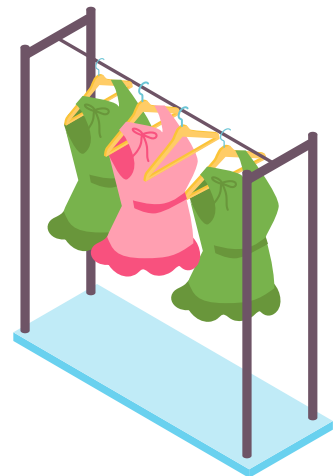
A GFT factory in Cambodia conducted interviews with stakeholders, including employees, customers, suppliers, and NGOs, through their communication channels such as a Complaints Box, Telegram Connection Link, and Facebook Page. One of the questions they asked was: “What are your challenges within our operation related to Labour Law?” Based on the feedback, the factory formed a committee of representatives from various factory departments, including workers’ representatives and a local trade union.

The committee meets monthly to listen to issues reported by employees. The committee wrote down the process for investigating the reported issues that was approved by workers’ representatives. The committee also created an OSH training for new employees and training on labour laws for all employees.

## 2.4 →

### Reflect and improve

*...The style you designed gets updated every season so you get inspired to add new details and use new fabric, ensuring your piece becomes more and more refined over time.*



HREDD needs to be updated on an ongoing basis to remain relevant and fit for purpose, it is never finished or perfect - and that is ok! You should measure and evaluate your HREDD processes regularly to set good goals and make sure you improve.

- Collect data regularly and use KPIs to understand what is working well and what is not to focus your efforts and resources. Really think about what you want to measure and focus on changes and positive impact.
- Every organisation has to define their own KPIs that are linked to their HREDD measures and approach to ensure they are working well. Examples of KPIs include the following:

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### **No-show rates and employee turnover**

Over time, good working conditions should lead to fewer absences and higher employee retention rates.

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### **Grievances received and remediated**

More grievances does not mean your HREDD processes are not working, it often means the opposite - the more grievances you receive and successfully remediate, the more trust you build with your workforce to raise concerns. If your processes to resolve issues and prevent risks are working well your grievance numbers should be decreasing again over time.

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### **Number and percentage of employees who received training on human rights and environmental topics**

As awareness of risks and responsibilities increases, you should see more employee engagement on topics related to people and the environment, incl. initiating improvement of processes, reporting issues and concerns, etc.

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### **Measurable changes of behaviour as a result of training**

## Percentage of forest wood vs percentage of alternative energy sources for heating and steaming

The GFT sector uses a large amount of forest wood for washing, ironing, and dyeing processes which contributes to deforestation and GHG emissions. Transitioning to alternative energy sources such as plantation wood, electric boilers or rice husk briquettes can reduce negative environmental impacts. 

- Be accountable for the shortcomings of HREDD implementation and introduce concrete measures to improve them.
- Be transparent towards your stakeholders by publishing relevant data and information about your HREDD processes.
- Continuously build your understanding and visibility of your deeper value chain - it will help you plan your production and mitigate risks.

### GO AHEAD

## Discuss and learn together

**Key result: Establish regular exchanges to improve your HREDD approach.**

Set up regular meetings with all employees and stakeholders that are involved in your HREDD processes to discuss what is working and what needs to be improved. You can present data you measured and think about what it means together.

For example, if you receive more grievances it does not necessarily mean it is a bad thing. It can also mean that your employees are more comfortable to share problems and trust you to try and find a solution.

Be proactive. Communicate what you are doing, because you are doing a lot. Write a 2-3 page paper summarising your HREDD approach and send it to your buyers proactively. They will be thrilled to receive information from you. Be proud!

**Cambodia-based business association**



# 03

**Conclusion:  
Key  
messages**

# 03

## Conclusion: Key messages

HREDD is a **good and necessary investment** in your business



**Ensure a strategic and continuous approach to implementing HREDD in your organisation** - first understand what processes directed at people and environment are already in place, then build on them to close the gaps

HREDD is about **understanding** and **addressing** risks to people and the environment - **focus on where risks are most severe and likely** from the perspective of those affected



**Ask for help and support,** you are not alone!



**Be open and transparent** - all your stakeholders will appreciate **honesty**, even if it means talking about problems

04

**Annex** 

# Glossary

These definitions were developed based on the following sources:

- [EU Corporate Sustainability Due Diligence Directive](#)
- [German Act on Corporate Due Diligence in Supply Chains](#)
- [OECD Glossary of technical terms related to due diligence](#)
- [UNGP Reporting Framework Glossary](#)
- [UN Human Rights Council OEIGWG 2023 Updated draft binding treaty instrument](#)

## Access to remedy

Access to remedy means that the organisation has to provide acceptable solutions or resolutions to people who experience or experienced harm related to human rights and the environment.

## Accountability system

A system that holds individuals and organisations responsible for their actions, ensuring they meet a set of standards and report on their conduct transparently.

## Corrective Action Plans

A set of steps that need to be taken within a specific timeframe to address a finding or fix an issue that was identified during an audit.

## Due diligence

The process through which organisations can identify, assess, prevent and/or mitigate, remedy, and account for how they address actual or potential negative impacts in their own operations, supply chains, and business relationships.

## Grievance mechanism

Formalised ways to allow individuals or communities to express complaints and seek remedies for the harm they feel has been caused by an organisation.

## Home workers

Individuals who carry out their tasks from their personal residence rather than a centralised workplace. These workers may be part of the informal sector and are often employed through subcontracting arrangements.

## Human rights and environmental risks

Human rights are the basic rights and freedoms that every person has by birth and without discrimination, for example the right to life or freedom of speech. Labour rights, such as freedom of association or occupational safety and health, are also human rights. Human rights are closely linked to the environment, such as the right to a clean, healthy and sustainable environment. The minimum core of internationally recognised human rights are those rights included in the [International Bill of Human Rights](#) and the [ILO Declaration on Fundamental Principles and Rights at Work](#).

## Key Performance Indicators (KPIs)

Key Performance Indicators (KPIs) are quantifiable measures used to evaluate the success of an organisation, department, or process in achieving key objectives. They provide a way for companies and individuals to assess the effectiveness of their actions and strategies against predefined goals, enabling them to make informed decisions and adjustments as needed.

## Mitigate/mitigation

The mitigation of a negative human rights or environmental impact refers to actions taken to reduce the extent of the impact or the likelihood that a potential negative impact will occur.

## Responsible Purchasing Practices

The Common Framework for Responsible Purchasing Practices defines ‘purchasing practices’ as ‘the actions taken by a buying company in order to purchase a product or service (in whole or in part) from a supplying business. They encompass design and product development, planning and forecasting, critical path management, contracts, technical specifications, order placement and lead times, cost and price negotiations, payment terms and also the underlying behaviours, values and principles of purchasers which impact supplying companies and ultimately workers’ lives.’ Implementing ‘responsible’ purchasing practices can support ‘suppliers’ ability to plan production effectively, manage working hours, pay workers fairly and invest in improving labour conditions, which in turn helps to boost productivity, stabilise suppliers’ workforces and build resilience in supply chains.’

## Rights holders

Rights holders are people whose human rights could be negatively affected by business activities. Rights holders are also often referred to as ‘affected stakeholders’ (see Stakeholder definition). Organisations should consider the perspective of rights holders, especially the most vulnerable among them (depending on context children and adolescents, women, older persons, minorities, persons with disabilities, migrants, etc.)

## Salient risks

Human rights and environmental risks whose impact on people and the environment could be the most severe and/or likely.

## Shared responsibility

Shared responsibility refers to a framework or principle where duties, obligations, or liabilities are divided among multiple parties. Instead of one party being solely responsible for an action or its outcomes, the responsibility is distributed among several stakeholders, each contributing a portion to the overall responsibility.

## SMART goals

SMART goals are Specific, Measurable, Achievable, Relevant, and Time-Bound.

## Stakeholders

Any individual or organisation that may affect, or be affected, by a company’s actions and decisions. Particularly relevant stakeholders in the context of HREDD are rights holders and their legitimate representatives, including trade unions, as well as civil society organisations and others with experience and expertise related to business impacts on human rights.

## Subcontractors

Third-party operators, often smaller businesses or individuals, hired by an organisation to perform specific tasks as part of a larger project.

## Value chain

An organisation’s value chain encompasses the activities that convert input into output by adding value. It includes entities with which it has a direct or indirect business relationship and which either (a) supply products or services that contribute to the organisation’s own products or services or (b) receive products or services from the organisation.

# Tools/Resources

## Key overarching frameworks and tools

- [UN Guiding Principles on Business and Human Rights](#) by the Office of the United Nations High Commissioner for Human Rights
- [OECD Due Diligence Guidance for Responsible Business Conduct](#) by the Organisation for Economic Cooperation and Development (OECD)
- [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#) (Khmer and Mandarin translation)
- [OECD Due Diligence Alignment Assessment Tool for responsible supply chains in the garment and footwear sector](#)
- [OECD Due Diligence Checker, Garment and Footwear Sector](#)

## Information on HREDD Legislation

- [An Apparel Supplier's Guide: Key Sustainability Legislations in the EU, US and UK](#) by Epic Group, Simple Approach, Shahi Exports, and Norlanka with support from Transformers Foundation and GIZ-FABRIC

## Integration

- [People and planet in business - A simple guide to how small and micro companies can start or strengthen their due diligence](#) by Fairtrade International
- [A Guide for Integrating Human Rights into Business Management](#) by UN Global Compact and the Office of the United Nations High Commissioner for Human Rights

- [A Guide for Business: How to Develop a Human Rights Policy](#) by UN Global Compact and the Office of the United Nations High Commissioner for Human Rights
- [The Common Framework for Responsible Purchasing Practices](#) by the Multi-Stakeholder Initiative Working Group on Responsible Purchasing Practices
- [Human Rights Due Diligence and the Environment: A Guide for Business](#) by the UN Development Programme (UNDP)

## Risk assessment

- [SME Compass risk analysis tool](#) by the Helpdesk for Business and Human Rights
- [Supply chain mapping, transparency and traceability 1.0: A practical guide for companies and suppliers](#) by Fair Labour Association
- [Assessing Human Rights Risks and Impacts, Perspectives from Corporate Practice](#) by UN Global Compact Network Germany and the Institute for Human Rights

## Grievance mechanism and remediation

- [Grievance Mechanisms in the Textile and Garment Sector in Cambodia](#) by Responsible Business Hub (RBH) Cambodia
- [Access to Remedy in Cases of Business-Related Human Rights Abuse: An Interpretive Guide](#) by the Office of the United Nations High Commissioner for Human Rights

## Training

- [Cambodian Garment Training Institute](#) (Course on Due Diligence Awareness)
- [OECD e-learning Academy on Responsible Business Conduct](#)

## Monitoring and evaluation

- [Setting up an effective monitoring system for your company's supply chain - Understanding and implementing due diligence obligations](#) by the Partnership for Sustainable Textiles

## Stakeholder engagement

- OECD due diligence expectations on meaningful engagement with worker representatives and trade unions in the garment and footwear sector (forthcoming)
- [What makes stakeholder engagement meaningful? 5 insights from practice](#) by UN Global Compact Network Germany

## Communication


- [UN Guiding Principles Reporting Framework](#) by Shift Project and Mazars
- [Living wage public reporting](#) by Fair Labour Association

## Guidance for Suppliers

- [Supply chain collaboration between obligated companies and their suppliers - The most important questions and answers for SMEs](#) by the German Federal Office for Economic Affairs and Export Control (BAFA)
- [Supply chain collaboration between obligated companies and their suppliers - The most important questions and answers for SMEs](#) (Khmer and Mandarin translations)
- [Supply Chain Due Diligence - A Beginner's guide for international suppliers](#) by the Bavarian Environment Agency



## Template: HREDD implementation plan

HREDD core element or risk topic	Objective	Activities	Who is involved	Who is leading	Timeline	KPI	Status
CORE ELEMENT EXAMPLE: Training	Raise awareness of employees' rights to promote reporting risks and violations	Training for new employees during onboarding  Annual refresher for all employees	HR department  Legal	<i>Employee name</i>	First training to launch in Q1 of 2024	Number of employees who received training each year	Rolled-out
CORE ELEMENT EXAMPLE: Grievance mechanism	Enable anonymous reporting of concerns by internal and external stakeholders	Launch new reporting system using text messages  Promote new system using posters, social media, employee assemblies, etc.	HR department  IT  Employees (their representatives/ unions)	<i>Employee name</i>	January to October 2025	Grievances received, investigated, closed or remediated	Project kick-off in January 2025
RISK TOPIC EXAMPLE: Freedom of association	Ensure employees know that they are free to form or join unions of their own choice	Conduct training for HR, Legal and employees on the legal framework and principle of the right of freedom of association  Introduce new freedom of association policy	HR department  Legal department  Employees (their representatives/ unions)	<i>Employee name</i>	January to December 2025	Number of unions formed; number of employees joining unions	Project kick-off in January 2025
RISK TOPIC EXAMPLE: Waste management	Clarify and promote employees' responsibility in waste management	Roll out and monitor recycling program with proper support such as training and Guide material  Form a committee to track and measure waste management activities with regular reporting to management activities with regular reporting to management	Operations  Legal or Compliance department  Management	<i>Employee name</i>	November 2024 to June 2025	Waste collection fee; number of employees who received training; amount of waste per waste category; percentage of reusable materials	Project kick-off in November 2024
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## Relevant laws

### Selection of National Law relevant for many buyers:

- EU Corporate Sustainability Due Diligence Directive
- German Act on Corporate Due Diligence Obligations in Supply Chains
- German Act on Corporate Due Diligence Obligations in Supply Chains  
(Khmer and Mandarin translations)
- French Corporate Duty of Vigilance Law

### International Law ratified by Cambodia:

- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- ILO's Convention on Forced Labour
- ILO's Convention on Freedom of Association and Protection of the Right to Organise
- ILO's Convention on the Right to Organise and Collective Bargaining
- ILO's Convention on Equal Remuneration
- ILO's Convention on Abolition of Forced Labour
- ILO's Convention on Discrimination (Employment and Occupation)
- ILO's Convention on Minimum Age
- ILO's Convention on Worst Forms of Child Labour

### Cambodian Law:

- Constitution of the Kingdom of Cambodia
- Law on Labour
- Law on Trade Union
- Law on Minimum Wage
- Law on Social Security Schemes
- Environment and Natural Resources Code
- Sub-Degree on Water Pollution Control
- Sub-Degree on Air and Sound Pollution Control
- Sub-Degree on Wates and Solid Waste Management
- Sub-Degree on Plastic Bag Management
- Sub-Degree on Drainage and Wastewater Treatment Systems Control



# A Guide for Cambodian Garment, Footwear and Travel Goods Manufacturers to Why Human Rights & Environmental Due Diligence Matters and How to Approach It.

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