



MINISTRY OF HUMAN RIGHTS  
GOVERNMENT OF PAKISTAN

FIRST FIVE YEAR  
**NATIONAL  
ACTION PLAN ON  
BUSINESS AND  
HUMAN RIGHTS**

(2021-2026)

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## FOREWORD



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The Ministry of Human Rights, with the support of United Nations Development Programme, is pleased to publish Pakistan's first National Action Plan on Business and Human Rights, aimed at fulfilling Pakistan's commitment to protect against adverse human rights impacts resulting from business activity, and creating an environment conducive to fostering corporate respect for human rights. Further, in preparing this National Action Plan, Pakistan expresses its commitment to fully comply with its obligations vis-à-vis ensuring access to effective remedies in cases of human rights abuses that occur during business operations.

As a developing economy, Pakistan understands the need to ensure stability, security, good governance, and the rule of law within its territory to secure sustainable and long-term economic growth. However, it must be emphasised that the fundamental purpose of economic growth is to promote the equal opportunity for all citizens to live their lives with dignity. In that regard, the Protect, Respect, and Remedy framework, as contained in the United Nations Guiding Principles on Business and Human Rights provides a strong foundation to steer Pakistan's economic development in a manner which places the continuous advancement of human rights as the core national objective. To operationalise this framework, Pakistan intends to adopt a pragmatic mix of mandatory and voluntary measures to promote the protection and respect for human rights in all forms of business activity, and provide remedies for adverse human rights impacts where they have occurred.

Prior to undertaking preparation and finalisation of the National Action Plan, the efforts of the Government of Pakistan in protecting and promoting human rights, particularly of women, vulnerable and marginalised groups, highlight its commitment to fulfilling its international human rights obligations. Actions include legislative initiatives, operationalisation and implementation of laws, research and survey work, sensitisation, awareness and education campaigns, and engagement with key stakeholders through a range of conferences and workshops.

A key objective of the Government of Pakistan is institutional development and capacity-building to enhance responses to human rights violations resulting from business activity. The National Action Plan details how the State of Pakistan will ensure, through legislative, judicial, administrative, and other appropriate means, access to an effective remedy where human rights abuses occur. Consequently, this Action Plan is a logical corollary to the capacity-building and reform efforts the Government has undertaken recently.

## INTRODUCTION

### What are the United Nations Guiding Principles on Business and Human Rights?

In June 2011, the United Nations Human Rights Council (UNHRC) endorsed the UN Guiding Principles on Business and Human Rights (UNGPs) to address the adverse human rights impacts resulting from business activity. The UNGPs were the culmination of several years of consultations amongst States, business enterprises and civil society organisations, led by the then Special Representative to the UN Secretary General, Professor John Ruggie. The UNGPs provide a global standard for addressing and preventing human rights issues and abuses resulting from business activity. They do not create any new international obligations on the State but stand to substantiate the ones that have already been ratified.

The UNGPs are based on what has come to be known as the “Protect, Respect and Remedy Framework”, which rests on three pillars<sup>1</sup>:

- **Pillar I:** States’ existing obligations to respect, protect and fulfil human rights and fundamental freedoms
- **Pillar II:** The role of business enterprises as specialized organs of society performing specialized functions, required to comply with all applicable laws and to respect human rights
- **Pillar III:** The need for rights and obligations to be matched to appropriate and effective remedies when breached

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### Statement of Commitment to Implement the United Nations Guiding Principles on Business and Human Rights by the State of Pakistan

Through the National Action Plan (NAP), Pakistan intends to provide a framework for the implementation of the UNGPs and ensure that the fundamental rights of its citizens are protected against adverse human rights impacts resulting from business activity. In addition to

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1. UN Office of the High Commissioner on Human Rights (OHCHR). United Nations Guiding Principles on Business and Human Rights. [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

the protection of human rights, Pakistan also aims to strengthen its redressal mechanisms to ensure that victims are provided adequate remedies where business activity violates human rights.

Commitment to the protection and promotion of human rights is a cornerstone of Pakistan's Constitution. Further, Pakistan has ratified several fundamental international human rights instruments, which have been transposed into the domestic regime through a variety of Federal and Provincial laws and policies. These include seven of the nine core human rights treaties Pakistan is a State Party to.<sup>2</sup> Pakistan has also ratified International Labour Organization's (ILO) eight core labour standards<sup>3</sup>, in addition to several further ILO conventions. Finally, Pakistan is also committed to achieving its targets under the Sustainable Development Goals (SDGs) which also reflect fundamental principles of human rights.

While the NAP relates primarily to the proposed actions under eight priority areas through which Pakistan aims to implement the UNGPs framework (Chapter 3), it also explicitly specifies the State of Pakistan's expectations of business enterprises (Chapter 4). These expectations relate to both the respect of human rights throughout the operations and value chains of a business enterprise, and the provision of adequate remedies to address adverse impacts.

Implementation of the NAP, and the proposed actions under each priority area, in addition to effective inter-ministerial and inter-provincial coordination, will also require commitment from and credible action taken by the business community. Additionally, the inclusive participation and the vocal oversight of civil society, workers' organisations, and other stakeholders will be vital in helping ensure that adverse human rights impacts occurring through business activity are brought to light and corrective action is taken in a timely manner.

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2. That is, the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), the Convention on the Rights of the Child (CRC), Convention on the Rights of Persons with Disabilities (CRPD), Convention on the Elimination of All Forms of Racial Discrimination (ICERD), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and the Convention against Torture (CAT).

3. That is, Forced Labour Convention, 1930 (No. 29); Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); Right to Organise and Collective Bargaining Convention, 1949 (No. 98); Equal Remuneration Convention, 1951 (No. 100); Abolition of Forced Labour Convention, 1957 (No. 105); Discrimination (Employment and Occupation) Convention, 1958 (No. 111); Minimum Age Convention, 1973 (No. 138); and, Worst Forms of Child Labour Convention, 1999 (No. 182).

## NATIONAL ACTION PLAN ON BUSINESS AND HUMAN RIGHTS

### 1.1 | What is the National Action Plan on Business and Human Rights?

In relation to Business and Human Rights (BHR), the UNHRC established the UN Working Group on Business and Human Rights (UNWG) in 2011, which works to “promote the effective and comprehensive dissemination and implementation of the Guiding Principles on Business and Human Rights.”<sup>4</sup> The UNWG has strongly urged States to adopt National Action Plans on BHR which form an effective platform for the implementation of the UNGPs.

National Action Plans are policy documents through which States articulate priorities and actions that they intend to adopt to support the implementation of international and domestic obligations with respect to specific policy areas. In relation to BHR, a NAP is defined as an “evolving policy strategy developed by a State to protect against adverse human rights impacts by business enterprises in conformity with the UN Guiding Principles on Business and Human Rights.”<sup>5</sup>

Many businesses in Pakistan are cognisant of their responsibility towards the protection and promotion of human rights. Some multinational companies and State-owned companies have incorporated policies that reflect international human rights standards, which can be further strengthened through complying with the State Expectations laid out in the NAP, as well as staying abreast of relevant legislative and regulatory actions being proposed. Further, the NAP builds awareness on the importance of human rights due diligence in business operations and supply chain management, which has emerged as a salient feature of the international human rights and sustainable development agenda.

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4. OHCHR. Working Group on the issue of human rights and transnational corporations and other business enterprises. <https://www.ohchr.org/EN/Issues/Business/Pages/WGHRandtransnationalcorporationsandotherbusiness.aspx>

5. United Nations Working Group on Business and Human Rights (UNWG). Guidance on National Action Plans on Business and Human Rights. [https://www.ohchr.org/Documents/Issues/Business/UNWG\\_NAPGuidance.pdf](https://www.ohchr.org/Documents/Issues/Business/UNWG_NAPGuidance.pdf)

## 1.2 | Five-Phase Process of the National Action Plan

The formulation of the NAP is the result of a series of consultations with multiple stakeholders and a National Baseline Assessment (NBA) on legislation and policy relevant to BHR in Pakistan. Pakistan proceeded in accordance with the five phase NAP process, as provided in the 'Guidance on National Action Plans on Business and Human Rights' (hereafter, NAP Guidance Document), published by the UNWG, that is, (1) initiation; (2) assessment and consultation; (3) drafting; (4) implementation; and, (5) update. With the finalisation and launch of this NAP, the first three phases have been completed.

### i. Initiation

As a first step in the process, a formal commitment by the Government of Pakistan to develop a NAP was announced in November 2018 by the Joint Secretary, Ministry of Human Rights (MoHR) at the Annual Forum on Business and Human Rights in Geneva. This was followed by MoHR hosting an inter-ministerial meeting with relevant stakeholders, informing them of the plan and bringing them on-board, including through subsequent consultations with respective Provincial Line Departments. The Secretary, MoHR also reiterated Pakistan's commitment to developing a NAP during the Asia Pacific Forum held in June 2020. In September 2020, the MoHR, in the presence of Cabinet Ministers, and international and national stakeholders restated this commitment. Relevant government departments, civil society, and other stakeholders were identified and included in the subsequent NAP development process. An important step was the translation of the UNGPs in Urdu to facilitate awareness on the contents of the UNGPs.

### ii. Assessment and Consultation

As part of the assessment and consultation process, an NBA was conducted to lay the groundwork for a comprehensive and targeted NAP, manifesting Pakistan's commitment to overcoming the challenges and adverse human rights impacts resulting from business activity. The NBA was carried out utilising the Danish Institute for Human Rights (DIHR) - International Corporate Accountability Roundtable (ICAR) Framework, which has been designed to adequately inform the formulation and prioritisation of actions in the NAP. The template



proposes a methodology to evaluate the current level of implementation in relation to all three pillars, and was contextualized to Pakistan's requirements. In line with the DIHR template, each thematic area within the NBA was also aligned with the SDGs. The NBA was conducted using a combination of quantitative and qualitative methods. These included:

- Desk review of (1) Constitutional obligations, legislation, judicial precedent, international laws and normative principles of thematic policy areas identified in the DIHR template; (2) Publicly available statements, policies, and procedures of over 100 companies; (3) Reports on corporate behavior in relation to business implementation of the UNGPs; and, (4) judicial and non-judicial grievance mechanisms as well as barriers to accessing them
- Quantitative survey of a sample of companies focusing on human rights policies and frameworks within their organisations
- Multi-stakeholder consultations and focus group discussions in Islamabad, Quetta, Peshawar, Karachi, Lahore, Sialkot, Faisalabad, and Gilgit-Baltistan

This process revealed several major issues concerning the protection, respect, and remediation of human rights in business activity. These included financial transparency and corruption in public procurement contracts, gender-based discrimination and equal opportunity in the workplace, lack of human rights due diligence mechanisms, limited scope as well as the poor implementation of occupational health and safety standards, inhumane working conditions and wages, prevalence of child and forced or bonded labour, heightened vulnerabilities of workers in the informal economy, and more.

Additionally, through the NBA, it was demonstrated that while the UNGPs and BHR in Pakistan are relatively new concepts, several companies in the surveyed sample have in place Corporate Social Responsibility Initiatives and Company Codes of Conduct. Most survey respondents stated that their companies have some form of internal human rights policies, including policies on the enforcement of the principle of non-discrimination, protection from sexual harassment, etc. Additionally, most respondents also stated that these human rights policies are communicated to company employees as well as third party stakeholders. However, only a few respondents stated that their companies employed more than a minute proportion of ethnic or religious proportions, and a minority of respondents stated that their companies had a fixed quota for the employment of women. Similarly, most respondents stated that their company did not allow their workers to exercise their right to freedom of association.

### iii. Drafting

The process of drafting the NAP was in accordance with the NAP Guidance Document of the UNWG.<sup>6</sup> Following the preparation of the zero draft, additional multi-stakeholder consultations were held in Quetta, Karachi, and Peshawar and further proposed actions were obtained through this approach. Relevant inputs from the consultations were then incorporated into the first draft of the NAP. In March 2021, this draft of the NAP was disseminated for comments to various Federal Ministries and Provincial Departments, as well as National Human Rights Institutions (NHRIs), and other stakeholders, with a reminder for comments sent in July 2021. Additionally, the draft NAP was also uploaded on a dedicated BHR website, hosted by the Ministry of Human Rights, with an open call for public feedback from civil society, academia, and international development organisations.<sup>7</sup> Inputs received through these channels were carefully reviewed and incorporated into the NAP where relevant and feasible.

### iv. Implementation

A NAP Secretariat will be established within the Ministry of Human Rights with the responsibility of coordinating efforts related to implementation of the NAP. Additionally, an inter-Ministerial and inter-Departmental NAP Steering Committee will be notified which will be composed of the major entities at Federal and Provincial levels responsible for implementation of the proposed actions of the NAP.

The roles and responsibilities of the NAP Secretariat will include:

1. Coordination with relevant entities, at Federal and Provincial levels
2. Facilitation of NAP Steering Committee meetings
3. Any initial update, clarification, or strengthening of implementation plan if required, with approval of NAP Steering Committee
4. Data collection and management relevant to NAP
5. Conducting of NAP mid-term review
6. Translation of NAP into Urdu
7. Promotion of NAP and related awareness, education, advocacy, and capacity-building initiatives, in coordination with relevant stakeholders including government, NHRIs, civil society, and business

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6. UNWG. Guidance on National Action Plans on Business and Human Rights.

7. Ministry of Human Rights. Business and Human Rights Webpage. <https://bhr.com.pk>

## v. Update

The NAP Secretariat will conduct a mid-term review through consultations with all relevant stakeholders to gauge progress on the implementation of the NAP and identify any adjustments required. Near the conclusion of the five-year implementation period, the NAP Secretariat, will lead an evaluation to provide recommendations for the development of the subsequent NAP.

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### 1.3 | NAP Priority Areas

Informed by the recommendations of the NBA, strengthened by the consultations and focus group discussions with stakeholders at the Federal and Provincial levels, and under the framework of Pakistan's legislative and policy framework, eight priority areas and constituent proposed actions have been identified. In accordance with devolution following the 18th Constitutional Amendment, where applicable, proposed actions are disaggregated by the Federal and Provincial levels.

A total of 69 actions are proposed at the Federal and Provincial levels, under the following priority areas:

1. Financial Transparency, Corruption and Human Rights Standards in Public Procurement Contracts
2. Anti-Discrimination, Equal Opportunity, and Inclusion
3. Human Rights Due Diligence
4. Labour Standards and the Informal Economy
5. Child Labour
6. Forced or Bonded Labour
7. Occupational Health and Safety
8. Access to Remedy

## 1.4 | Coherence between the National Action Plan, Other Government Policies, and Pakistan's International Commitments

The protection of human rights is a fundamental concern for the State of Pakistan, and is enshrined in its Constitution and legislative framework. It is also reflected in its policy frameworks, including economic policies, which chart Pakistan's ambitions and roadmap for strong and sustainable economic growth in the coming years. Pakistan is committed to inclusive and sustainable economic growth that places human dignity at its center. Consequently, a National Action Plan on Business and Human Rights, serves as a normative and operational framework to complement economic development that does not come at the expense of the protection and respect for human rights.

The NAP also complements Pakistan's National Action Plan on Human Rights 2016<sup>8</sup>, focused on the implementation of key human rights priorities and international instruments, as well as crosscutting interventions for the protection of human rights. The Action Plan calls for a rights-based approach to development planning, strengthening of the National Human Rights Institutes (NHRI), the implementation of international commitments through capacity-building programs, and the effective functioning of Treaty Implementation Cells (TICs).

The NAP will align with Pakistan's commitments, and domestic frameworks relevant to the international human rights treaties and labour conventions introduced in the previous section, as well as reporting mechanisms relevant to treaty bodies, Universal Periodic Review, and the Committee of Experts on the Application of Conventions and Recommendations. The increased awareness amongst rights-holders of the protections owed to them and the State expectations of businesses will help bolster a national effort towards the protection of human rights in the business context in Pakistan. This will strengthen Pakistan's position as a responsible trading partner in the region and will also support its fulfillment of reporting requirements for international human rights mechanisms and other relevant frameworks. Additionally, the NAP will also support

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8. MoHR. National Action Plan on Human Rights 2016. <http://www.mohr.gov.pk/Sitelimage/Misc/files/APBL.pdf>

and complement Pakistan's commitment to the SDGs, which seek to "advance the realization of human rights for all"<sup>9</sup>. Most of the SDGs directly or indirectly reflect international human rights and labour standards.<sup>10</sup>

The NAP will also complement frameworks with similar principles related to the protection and promotion of socially inclusive, sustainable, and responsible business operations, for example, Pakistan's commitment to the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration). Recently, Pakistan became the first country in the Asia-Pacific region to appoint a National Focal Point for the application of the MNE Declaration, that is, the Employers' Federation of Pakistan. With the launch of the NAP, and in conjunction with complementary principles such as the MNE Declaration, Pakistan demonstrates its ongoing commitment to protect and promote human rights in business activity.

Pakistan's GSP+ Status, which was granted in light of and to support Pakistan's efforts at strengthening compliance with the 27 core international conventions pertaining to human rights, labour, corruption and the environment, is contingent upon the implementation of these conventions, and will be further strengthened through the protection of human rights in business activity. The NAP provides a strong framework to support Pakistan's commitments under schemes such as GSP+.

It is incumbent upon all stakeholders, including business enterprises and civil society, to support the principles of the Protect, Respect, and Remedy framework, and the implementation of the NAP at the grass-roots level. It is hoped that this framework will help galvanise a national dialogue and effort with regards to a simple, but powerful, message that human rights and economic growth through business activity are not, and should not be perceived as, contradictory or mutually exclusive. The protection and respect for human rights in business activity in Pakistan will simultaneously fulfill the fundamental rights of its citizens, and also promote Pakistan's economic competitiveness and role in a global market which increasingly emphasises ethical and responsible business practices.

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9. OHCHR. Human Rights and the 2030 Agenda for Sustainable Development. <https://www.ohchr.org/en/issues/SDGS/pages/the2030agenda.aspx>

10. For a full list of linkages between SDGs and human rights, please refer to the following summary table - OHCHR. Summary table on the linkages between the SDGs and relevant international human rights instruments. [https://www.ohchr.org/Documents/Issues/MDGs/Post2015/SDG\\_HR\\_Table.pdf](https://www.ohchr.org/Documents/Issues/MDGs/Post2015/SDG_HR_Table.pdf)

## 1.5 | COVID-19 and the NAP

The COVID-19 pandemic has brought about an unprecedented crisis, exacerbating existing inequalities and endangering human rights, as detailed in a recent study conducted by MoHR in partnership with UNDP.<sup>11</sup> It has also brought to light the fundamental relationship between business activity and human rights, and increased awareness about the responsibility of business enterprises to take actions to minimise the potential negative impacts of the pandemic on human rights in the context of business activity, through dialogue and collaboration with other stakeholders.

Therefore, the pandemic has provided businesses with an opportunity to embed respect for human rights into their values, play an instrumental role in enhancing economic and social resilience to future crises, and support sustainable development. To build back from the epidemic sustainably, businesses should assess the impacts of COVID-19 on stakeholders, including the impact on workers related to their business operations as well as value chains. Workers should be retained where possible, with businesses endeavoring to mitigate, as much as is possible, the negative impacts of unemployment through consultation and dialogue with unions and other worker bodies. There must also be an acknowledgment that socially vulnerable groups, such as women, children, elderly persons, persons with disabilities, minorities, transgender persons, and others, are particularly vulnerable to both the epidemiological and social impacts of the COVID-19 pandemic, and as such businesses should seek to mitigate the impacts upon them. Remedial mechanisms must also be strengthened to adequately handle complaints and problems raised by employees and other stakeholders, with a view to ensuring access to remedy.

Additionally, the COVID-19 pandemic has had a major impact on the nature of business in terms of the increasing amount of corporate activity moving to the digital realm, and the rapidly increasing role of freelance work and the gig economy. In light of these rapid changes, it is imperative that human rights are given the same level of importance in the digital economy. It is crucial that the rights of workers in the digital economy are respected, and ethical guidelines concerning data protection and privacy are adhered to.

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11. MoHR and UNDP. COVID-19 and Disaster Vulnerability in Pakistan: A Human Rights Based Analysis. <http://www.mohr.gov.pk/SiteImage/Misc/files/COVID-19%20and%20Human%20Rights%20Taskforce%20Report%20-%20FINAL%20edit.pdf>

02

## PROTECT, RESPECT, REMEDY FRAMEWORK

### Pillar I | State Duty to Protect Human Rights

The UNGPs require States to protect human rights in the context of business activity. These principles may be seen as a restatement of Pakistan's existing international obligations under the core UN human rights treaties and core ILO Conventions to which Pakistan is a State Party. Pakistan's domestic legal framework provides various guarantees and includes protection of the rights of workers especially in relation to discrimination, minimum wage, forced labour and the elimination of child labour. There are several other laws that specifically deal with the human rights of citizens with regards to protection from environmental degradation, corrupt practices, unlawful land arrangements, tax evasion, etc.

Additionally, Pakistan's Constitutional and legal framework encompasses core principles of remediation, such as the independence of the judiciary and adequate access to justice. The NHRIs in Pakistan have an evolving role and special powers to protect human rights and improve Pakistan's reporting standards internationally. In addition to the National Commission for Human Rights (NCHR), other NHRIs include the National Commission on Child Welfare and Development (NCCWD), the National Commission on the Rights of the Child (NCRC), and the National Commission on the Status of Women (NCSW). Additionally, the process is underway for the establishment of Pakistan's National Commission on Minorities (NCM). The State of Pakistan is committed to introducing robust implementation mechanisms and legislative amendments to bridge existing gaps and provide effective remedies to those who are adversely affected by business activity.

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### Pillar II | Corporate Responsibility to Respect Human Rights

The UNGPs attach great significance to the responsibility of businesses in respecting human rights, and this responsibility applies regardless of the size of the business enterprise. However, the means to address both potential and prevailing adverse human rights impacts are expected to be proportionate to the size of individual businesses and

the severity and scale of their human rights impacts. Further, the responsibility to respect human rights under the UNGPs is not limited to only the immediate and visible operations of a business, but also its relationships across its value chains.

Principles 11 to 24 of the UNGPs relate to the corporate responsibility to respect human rights. The foundational principles explain that businesses have a fundamental responsibility to respect human rights and take action against any human rights impacts occurring, or with the reasonable potential to occur, as a result of their activities. The operational principles provide specific recommendations and guidelines for businesses with regard to their obligations in this regard.

Businesses, across all sectors, have an immense capacity to affect human rights and thus must work with the State to ensure the protection and promotion of the fundamental rights enshrined in the Constitution. Additionally, it must be emphasised that the onus to respect human rights applies to all forms of business and economic activity, and thus applies equally to the informal economy, including home-based work and domestic work.

In relation to the legal obligations upon business enterprises and employers relating to human rights, there are several laws that regulate the rights of workers, provide for the protection of vulnerable or marginalised communities and safeguard equal opportunity and remuneration for different classes of workers. Pakistan also has in place laws relating to corruption & bribery, protection of the environment, taxation, land arrangements, consumer protection and the right to information in the context of business activity.

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### **Pillar III | Access to Remedy**

In relation to the third pillar of the UNGPs, States are obliged to take appropriate steps for the provision of and access to effective and timely remedial mechanisms, judicial or non-judicial, to victims of adverse human rights impacts resulting from business activity.

In relation to judicial mechanisms, the Constitution of Pakistan safeguards the independence of the judiciary and the right to a fair trial and due process. A significant challenge, in this regard, is the cost of litigation and the slow dispensation of justice due to the backlog of cases in Courts. Therefore, access to effective and timely justice is a serious concern for most litigants, especially those who fall in the lower income bracket. In this regard, the State of Pakistan has



taken several steps, including enacting the Cost of Litigation Act of 2017, which amongst several important measures, also discourages untimely and unnecessary adjournments in proceedings.

In addition to judicial mechanisms, quasi-judicial bodies exist to regulate competition in business, unfair labour practices and industrial disputes. These bodies include the Ombudsperson Offices in all four Provinces relating to sexual harassment at the workplace, taxation, insurance and any complaints faced by the public from Federal Government Departments including State Owned Entities. Additionally, the National Industrial Relations Commission (NIRC) has been established with the jurisdiction to resolve industrial disputes and unfair labour practices. Moreover, the NCHR has been established as an independent State body with an extensive mandate to protect and promote human rights. The NCHR has also been granted a quasi-judicial competence to investigate violations of human rights abuses either through individual complaints or through a suo motu capacity.

## 03

## NATIONAL ACTION PLAN PRIORITY AREAS AND PROPOSED ACTIONS

The following sections list eight general proposed actions followed by proposed actions under each of the priority areas of the NAP. Attached to each proposed action are suggested performance indicators, to measure the progress of implementation, as well as relevant UNGP(s) and SDG(s) against which the proposed actions are expected to deliver progress. An implementation plan is provided in Annex 1 which lists entities relevant to the implementation of the proposed actions.

To ensure policy coherence and fulfillment of the State of Pakistan's commitment to the implementation of the UNGPs, as well as its binding international obligations, implementation of the proposed actions will require committed and ongoing inter-ministerial and inter-provincial coordination and cooperation. Furthermore, in addition to the responsibility of implementing entities, the inclusion and active participation of civil society, employers and workers organisations, the business community, NHRIs, and other stakeholders will be critical in the implementation of the NAP and the advancement of the Protect, Respect, and Remedy framework across business activity.

### 3.1 | General Proposed Actions

#### Federal

1. Conduct a mapping exercise to chart national progress made against, and steps required to advance, the four elements of the Fundamental Principles and Rights at Work, that is: (1) the eradication of modern slavery; (2) abolishment of child labour; (3) elimination of discrimination in business activity and the workplace, including the gender pay gap, and; (4) protection of the right to freedom of association.

**Performance indicator(s):** (i) Mapping exercise report

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

2. Review framework, engage with, and build the capacity of, National Human Rights Institutions to promote and sustain effective support to the implementation and oversight of the protection, respect, and remediation of human rights in the context of business activity.

**Performance indicator(s):** (i) Review report; (ii) Number of capacity-building activities conducted with NHRIs in Pakistan

**UN Guiding Principle(s):** 3, 8, 25, 27

**Relevant SDG(s):** Goal 16 – Peace, Justice & Strong Institutions

3. Conduct a mapping exercise, including a consultative process, to assess the national legislative, policy, and regulatory framework relevant to human rights in the digital economy, including freelance work and the gig economy, and gather recommendations on steps needed to ensure the application of the Protect, Respect, and Remedy framework to the digital economy.

**Performance indicator(s):** (i) Mapping exercise report (2) Number of consultations held

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions

## Federal and Provincial

4. Review and update existing legislation to strengthen the protection of human rights within the context of business activity, incorporating gender equality as a foundational and cross-cutting theme, in line with Pakistan’s Constitutional and international obligations, and in support of the framework of the UNGPs.

**Performance indicator(s):** (i) Review report; (ii) Number of laws updated

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

5. Issue and disseminate BHR guidelines for business enterprises in line with the NAP—its priority areas, proposed actions and State expectations of business enterprises—and with regards to non-financial reporting on corporate human rights policies, human rights due diligence, and remedial mechanisms.

**Performance indicator(s):** (i) Development of Guidelines; (ii) Number of businesses to which Guidelines are disseminated

**UN Guiding Principle(s):** 1, 2, 3

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

6. Strengthen regulations, with respect to overseas labour abuse, on the registration and oversight of recruitment agencies providing overseas employment opportunities, and work with other Governments to ensure safe and just labour migration.

**Performance indicator(s):** (i) MOUs signed with other Governments; (ii) Number of recruitment agencies registered; (iii) Number of regulations strengthened

**UN Guiding Principle(s):** 1, 2, 3

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 17 – Partnerships for the Goals

7. Clear the backlog of cases in Courts, and explore the feasibility of strengthening and promoting alternate dispute resolution mechanisms for the fair, effective, and timely redressal of human rights violations resulting from business activity.

**Performance indicator(s):** (i) Number of cases resolved; (ii) Usage of alternate dispute resolution mechanisms

**UN Guiding Principle(s):** 1, 3, 8, 25, 26, 27, 28

**Relevant SDG(s):** Goal 16 – Peace, Justice and Strong Institutions

8. Incorporate mandatory principles of Business and Human Rights, including the NAP and the UNGPs, into technical and vocational training.

**Performance indicator(s):** (i) Number of TVET programs incorporating principles of BHR, NAP, and UNGPs

**UN Guiding Principle(s):** 2, 3, 8

**Relevant SDG(s):** Goal 4 – Quality Education; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

## 3.2 | NAP Priority Areas

In addition to the eight general proposed actions above, the following sections elaborate on the proposed actions for each of the priority areas, introduced in Chapter 1.3, at the Federal and Provincial levels:

### 3.2.1 | Financial Transparency, Corruption and Human Rights Standards in Public Procurement Contracts

As established during the NBA and consultative process, lack of financial transparency especially in relation to corruption and bribery are prevalent in Pakistan. These have a direct correlation with human rights as the lack of financial transparency contributes to money laundering, terror financing and tax evasion, which negatively impact social development programmes and human rights. Additionally, the nexus between corruption and the adverse impact on human rights needs to be explicitly highlighted in legislation and policies, and in the working of law enforcement bodies.

Various laws and regulations have been introduced by the State of Pakistan to curb corrupt practices and activities involving bribery. Similarly, enforcement mechanisms have also been established to ensure the effective implementation of the laws and regulations prohibiting corruption and activities involving bribery. Public procurement in Pakistan is governed by various legislative instruments and the entire process is managed by the Public Procurement Regulatory Authority. Implementation of human rights standards in the context of business operations can be encouraged in public procurement processes by requiring evidence of demonstrable respect for human rights as part of the bid. In addition to this, financial transparency of companies should also be considered a condition for the approval of a bid.

### Proposed Actions Federal

9. Pass the Whistleblower Protection and Vigilance Commission Bill 2019 to ensure protection of whistle-blowers disclosing information related to financial discrepancies and corruption.

**Performance indicator(s):** Enactment of the Whistleblower Bill

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 16 – Peace, Justice and Strong Institutions

10. Review and update the Public Procurement Regulatory Authority Rules to incorporate human rights due diligence as a key criterion in the bidding and evaluation process, and give preference to businesses that demonstrate actions taken to meet their human rights obligations.

**Performance indicator(s):** (i) Updated rules incorporating human rights due diligence

**UN Guiding Principle(s):** 1, 2, 3, 4, 5, 6, 8, 9

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions

11. Develop a model Code of Conduct, making explicit the relationship between business and human rights, for businesses that are State owned, controlled or which work with the State.

**Performance indicator(s):** (i) Development of a Code of Conduct; (ii) Number of businesses to which the Code of Conduct is disseminated; (iii) Number of businesses that formally announce the adoption of Code of Conduct

**UN Guiding Principle(s):** 1, 2, 3, 4, 5, 6, 8, 9

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions

12. Further strengthen judicial processes and create awareness on issues related to Anti-Money Laundering/Counter Terror Financing (AML/CTF) to encourage financial transparency.

**Performance indicator(s):** Number of trainings on AML/CTF

**UN Guiding Principle(s):** 1, 2, 3, 25

**Relevant SDG(s):** Goal 16 - Peace, Justice and Strong Institutions

### 3.2.2 | Anti-Discrimination, Equal Opportunity, and Inclusion

As established during the NBA and consultative process, the discriminatory treatment in business activity of women and vulnerable or marginalised groups, including transgender persons, Persons with Disabilities, minorities, migrant and refugee workers, and others, remains an ongoing challenge. Though legislation at both the Federal and Provincial levels exist for the protection of marginalised or vulnerable groups, further action is needed for the elimination of all forms of discrimination in business activity and the workplace.

Pakistan, in line with its Constitution which embeds equality for all as a fundamental right, and in line with its international obligations emanating as State Party to ICCPR, ICESCR, CEDAW, ILO Convention No. 100 (Equal Remuneration), ILO Convention No. 111 [Discrimination (Employment and Occupation)], and others, is fully committed to ensuring the equal participation without discrimination and equal protection before the law of women and vulnerable or marginalised groups.

**Proposed Actions**  
**Federal**

13. Ratify ILO Convention No. 190 (Violence and Harassment).

**Performance indicator(s):** (i) Steps taken required prior to ratification; (ii) Ratification of Convention

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 16 - Peace, Justice and Strong Institutions

14. Enact proposed amendments to the Protection Against Harassment of Women at the Workplace Act, including but not limited to clarifying, and expanding where required, definitional ambiguities in light of the objective and purpose of the Act, and to promote effective and comprehensive safeguarding against all forms of harassment in all workplaces.

**Performance indicator(s):** (i) Enacting of proposed amendments

**UN Guiding Principle(s):** 1, 3, 25, 26, 27, 28

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 16 - Peace, Justice and Strong Institutions

15. Conduct a national study to determine the sectors in which significant gender disparity is prevalent, and utilise the findings of the study to assess and develop a policy regarding the mandatory reservation of quotas for women in different sectors.

**Performance indicator(s):** (i) Report of national study; (ii) Number of consultations for the study; (iii) Development of a policy based on the consultations and baseline assessment

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

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**Federal and Provincial**

16. Review, and amend where required, existing laws pertaining to all forms of violence against women and girls, and ensure effective functioning of Gender-Based Violence Courts.

**Performance indicator(s):** (i) Review report; (2) Number of laws amended

**UN Guiding Principle(s):** 1, 2, 3, 8, 25, 26, 27, 28

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions

17. Create Women and Transgender Persons' Business Incubation Centres, and strengthen and facilitate existing ones in all Provinces, and provide equal funding opportunities for women and transgender-led businesses.

**Performance indicator(s):** (i) Number of Centres created or strengthened

**UN Guiding Principle(s):** 1, 2, 3, 5, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

18. Develop Labour Policies, or ensure implementation of existing Policies, which introduce a requirement for businesses to create an Internal Equal Opportunity Committee that receives complaints and conducts inquiries regarding wage gaps and discriminatory hiring practices.

**Performance indicator(s):** (i) Policies developed or implemented; (ii) Notification of requirement regarding internal equal opportunity committee; (iii) Number of businesses that have established an equal opportunity committee

**UN Guiding Principle(s):** 1, 2, 3, 22, 27, 28, 29, 30

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

19. Strengthen existing, and develop where required, civil remedies for discriminatory action based on gender, ethnicity, religion, disability, age, or any other factor.

**Performance indicator(s):** (i) Number of remedies developed or strengthened

**UN Guiding Principle(s):** 25, 26, 29

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

20. Increase access to low-interest or interest-free loans to women and vulnerable or marginalised groups.

**Performance indicator(s):** (i) Number of consultations with financial institutions (private & public); (ii) Establishing a policy framework in conjunction with women's advocacy groups; (iii) Implementation of policy



**UN Guiding Principle(s):** 1, 2, 3, 8, 12

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

21. Provide capacity-building support in the value chain for women and vulnerable or marginalised groups, and build awareness about their rights under the law as well as available remedial mechanisms in case of violations of their human rights in business activity or the workplace.

**Performance indicator(s):** (i) Number of capacity-building and awareness-raising activities

**UN Guiding Principle(s):** 1, 2, 3, 8, 11, 12, 25, 26, 27, 28, 29

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

22. Streamline regulatory requirements and procedures for business enterprises, aiming to reduce barriers to entry in business activity faced by women and vulnerable or marginalised groups.

**Performance indicator(s):** (i) Number of regulatory requirements and procedures streamlined

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

## Provincial

23. Develop Provincial policies and mechanisms, or ensure implementation of existing ones, related to the non-discrimination and inclusion of women and vulnerable or marginalised groups in business activity, and the provision of safe, healthy, and dignified working spaces for women and vulnerable or marginalised groups in the workplace.

**Performance indicator(s):** (i) Policies developed; (ii) Number of safe, healthy, and dignified working spaces established

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

24. Identify areas through a consultative process where additional funds need to be allocated to address gender inequality in business activity and the workplace.

**Performance indicator(s):** (i) Number of multi-stakeholder consultations for identification of areas that require budgetary allocation; (ii) Report on areas identified where additional funding is required

**UN Guiding Principle(s):** 1, 2, 3, 8, 25

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

25. Increase awareness about harassment at the workplace and gender-based discrimination, and existing reporting and remedial mechanisms, such as the Provincial Ombudsperson.

**Performance indicator(s):** (i) Number of awareness-raising activities

**UN Guiding Principle(s):** 2, 3, 8, 27

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions

26. Conduct Provincial mapping exercises to comprehensively assess existing challenges and deficits, and provide recommendations to eliminate discriminatory practices against women and vulnerable or marginalised groups in business activity or in the workplace.

**Performance indicator(s):** (i) Mapping exercise report

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

27. Build, or further strengthen existing, partnerships with and facilitate businesses to increase disability inclusion in business activity and at the workplace.

**Performance indicator(s):** (i) Number of partnerships and activities with businesses on disability inclusion

**UN Guiding Principle(s):** 2, 3, 8, 11, 12

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

28. Encourage private and public sector businesses to reduce gender gap and consider developing quotas to ensure adequate participation of women in the economy.

**Performance indicator(s):** (i) Consultations with relevant Government/private entities and stakeholders; (ii) Formulation of Policy on quotas for marginalised groups; (iii) Number of public & private organizations that have adopted the Policy

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 10 – Reduced Inequalities

29. Establish Provincial Entrepreneurial Advisory Cells for and led by women and vulnerable or marginalised groups.

**Performance indicator(s):** (i) Number of cells established

**UN Guiding Principle(s):** 2, 3, 8, 11, 12

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

30. Develop mechanisms to ensure vocational training of female prisoners to rehabilitate them and ensure their participation in the economy after completion of their prison sentences.

**Performance indicator(s):** (i) Number of female prisoners trained

**UN Guiding Principle(s):** 3, 9

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

### 3.2.3 | Human Rights Due Diligence

As established during the NBA and consultative process, the concept of human rights due diligence in Pakistan currently lacks a legislative framework. An anticipated challenge in the implementation of human rights due diligence is uncertainty and reluctance amongst businesses regarding the regulatory requirements and potential costs of abiding by human rights due diligence standards. The responsibility to respect human rights applies to all businesses irrespective of their size. However, effective human rights due diligence frameworks account for the differences between the sectors, operating contexts, and circumstances of different kinds of business enterprises, and the potential severity and scope of their human rights impacts. Consequently, the scale and complexity of human rights due diligence actions undertaken by different enterprises may vary.

Human rights due diligence is an increasingly prominent area of discussion around the globe, not as a tick-box compliance exercise, but as a vital means to obtaining better human rights outcomes. It is anticipated that export markets will be negatively affected in countries which fall behind in addressing human rights violations across their supply chains. A pragmatic mix of human rights due diligence mechanisms, including the adoption of voluntary and common standards by businesses, as well as the development of a legislative and regulatory framework, will support the strengthening of a sustainable and resilient Pakistani economy. The progress of mandatory human rights due diligence legislation around the globe, especially in important trading partners, will be closely followed by the Government of Pakistan. Pakistan benefits from trade schemes such as GSP+, and the continuous and improved protection of human rights in business activity will only serve to further strengthen Pakistan's international trading relationships.

Consistent Federal and Provincial coordination will be required to effectively conduct oversight and monitoring of compliance with human rights due diligence expectations. Progress in this regard will require strong communication and cooperation between relevant Ministries, Provincial Departments, and regulatory bodies for the establishment and oversight of human rights due diligence standards and guidelines, followed by the gradual development of a legislative framework.

## Proposed Actions Federal

31. Develop policy, including a proposed regulatory model, on the requirement of human rights due diligence for the approval of large-scale projects where the business activity poses a significant risk to the rights of a community at large, and incorporate into relevant existing Rules and Guidelines.

**Performance indicator(s):** (i) Policy development; (ii) Incorporation into relevant existing Rules and Guidelines

**UN Guiding Principle(s):** 1, 2, 3, 4, 5, 6, 8, 17, 23

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

32. Conduct feasibility study of human rights certification and provision of market incentives for businesses which demonstrate respect for human rights across their operations, including conducting human rights due diligence and publicising their efforts.

**Performance indicator(s):** (i) Feasibility study report

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

33. Conduct feasibility study on the future enactment of mandatory human rights due diligence legislation in Pakistan, studying the legislative, regulatory, and economic framework in this regard.

**Performance indicator(s):** (i) Feasibility study report

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

34. Conduct a study on the potential impact of the future enactment of mandatory human rights due diligence legislation by major trading partners, such as the European Union, on Pakistan's competitiveness in export markets, inflows of foreign direct investment, Pakistan's role in global supply chains, and schemes such as GSP+.

**Performance indicator(s):** (i) Assessment report

**UN Guiding Principle(s):** 1, 2, 3, 8, 9

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 12 – Responsible Consumption and Production; Goal 17 – Partnerships for the Goals

**Federal and  
Provincial**

35. Develop and launch a Human Rights Due Diligence Partnership Project with the private sector, for the purpose of establishing a framework and standards for human rights due diligence reporting.

**Performance indicator(s):** (i) Launch of Partnership Project

**UN Guiding Principle(s):** 2, 3, 11, 12, 15, 17, 23

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

36. Establish voluntary and common standards for conducting and reporting human rights due diligence in business activity, applicable to both the direct operations and across the value chains of public and private enterprises.

**Performance indicator(s):** (i) Development and dissemination of voluntary standards in line with international best practices

**UN Guiding Principle(s):** 1, 2, 3, 11, 12, 15, 17, 23

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

### 3.2.4 | Labour Standards and the Informal Economy

As established during the NBA and consultative process, Pakistan's labour challenges stem from the lack of strict enforcement of labour laws at the ground level. In addition to child labour and forced or bonded labour, the focus of the subsequent sections, challenges include the working conditions of domestic and home-based workers, curbs on trade union activity, and sexual and physical abuse at the workplace.

The respective Provincial Governments of Punjab, Sindh, and Khyber Pakhtunkhwa each passed a Labour Policy in 2018 committing to the provision of decent work for workers, in accordance with several ILO Conventions, and focusing on Occupational Health and Safety for workers, and the eradication of child labour as well as forced labour. Additionally, Punjab and the Islamabad Capital Territory have legislation regarding the rights of Domestic Workers. Pakistan has also ratified several ILO Conventions that require States to protect the rights of workers, eradicate child labour, forced labour or any forms of modern slavery. These conventions also require States to restrict working hours, prohibit all sorts of discrimination in employment and occupation, compensate workers incapacitated by occupational diseases, accidents or injuries and habilitation of disabled workers etc. The strengthened and effective enforcement of labour standards will promote the growth, benefits, protection, freedom, dignity, and equality of all workers across all sectors.

### Proposed Actions Federal

37. Adopt a National Policy on Home Based Workers (HBW).

**Performance indicator(s):** (i) Adoption of Policy

**UN Guiding Principle(s):** 1, 2, 3

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

38. Ratify ILO Convention No. 177 (Home Workers).

**Performance indicator(s):** (i) Steps taken required prior to ratification; (ii) Ratification of Convention

**UN Guiding Principle(s):** 1, 2, 3

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

39. Ratify ILO Convention No. 189 (Domestic Workers).

**Performance indicator(s):** (i) Steps taken required prior to

ratification; (ii) Ratification of Convention

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

## Federal and Provincial

40. Incorporate the terms of all ratified ILO conventions into the legal framework governing the rights of all workers in Pakistan, including those in the informal economy.

**Performance indicator(s):** (i) Amendments made to legislation of High-Level Meetings and consultations with Stakeholders on the scope of the ILO Conventions; (ii) Enactment of relevant legislation; (iii) Development of relevant policies

**UN Guiding Principle(s):** 1, 2, 3

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 - Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

41. Strengthen labour inspection mechanisms, including by ensuring the sufficient funding and capacity of the mechanisms, and conduct regular inspections of business enterprises, including in the informal economy, to safeguard adherence to minimum wage and other labour rights. Ensure inclusion of women as labour inspectors as well.

**Proposed Performance indicator(s):** (i) Measures taken to strengthen labour inspection mechanisms; (ii) Number of inspections carried out

**UN Guiding Principle(s):** 1, 2, 3, 4

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

42. Conduct a review process of labour laws, standards, and policies to gauge the differentiated impacts or deficits of these laws, standards and policies on women and vulnerable or marginalised workers, including in the informal economy, and identify and enact as required new or amended laws, standards, or policies.

**Performance indicator(s):** (i) Review process reports; (ii) Proposal of Amendments; (iii) Laws, standards, or policies enacted

**UN Guiding Principle(s):** 1, 3, 8



**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

43. Register all labour, including in the informal economy, and establish, or strengthen existing, Labour Management Information Systems.

**Performance indicator(s):** (i) Number of newly registered individuals; (ii) Establishment or steps taken to strengthen of Labour Management Information Systems

**UN Guiding Principle(s):** 1, 3, 8

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

44. Formalise all enterprises, including in the informal economy, and digitise business data.

**Performance indicator(s):** (i) Number of enterprises formalised; (ii) Number of businesses that have adopted digitisation

**UN Guiding Principle(s):** 1, 3, 8, 11, 15, 21

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

45. Formalise and strengthen wage payment mechanisms across all sectors, including the informal economy.

**Performance indicator(s):** (i) Formalisation of wage payment mechanism; (ii) Number of persons newly covered under formalized wage payment mechanism

**UN Guiding Principle(s):** 1, 3, 8, 11, 13, 15, 17, 22, 23

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

46. Provide life insurance and ensure compulsory EOBI Registration.

**Performance indicator(s):** (i) Number of newly registered establishments/industries; (ii) Number of newly registered insured persons

**UN Guiding Principle(s):** 1, 2, 3, 8

**Relevant SDG(s):** Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

## Provincial

47. Ensure provision of appointment letter or employment contracts as a requirement in the informal economy.

**Performance indicator(s):** (i) Number of employees issued appointment letters/contracts; (ii) Results of labour inspections/spot-checks

**UN Guiding Principle(s):** 1, 2, 3, 11

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

48. Pass Provincial legislation, or strengthen compliance with existing legislation, on Domestic Workers.

**Performance indicator(s):** (i) Provincial legislation passed or steps taken to strengthen compliance

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

49. Conduct awareness raising campaigns including mass media drives, capacity-building workshops, and industry-specific campaigns about the unique challenges faced by informal workers and steps needed to address them.

**Performance indicator(s):** (i) Number of awareness-raising activities; (ii) Number of industries targeted

**UN Guiding Principle(s):** 2, 3, 8

**Relevant SDG(s):** Goal 8 - Decent Work and Economic Growth

50. Conduct an Impact Assessment of COVID-19 on the tourism industry (including a gender impact assessment), with a focus on adverse human rights impacts.

**Performance indicator(s):** (i) Impact Assessment Reports

**UN Guiding Principle(s):** 1, 3, 8

**Relevant SDG(s):** Goal 1 – Zero Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 11 – Sustainable Cities and Communities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

### 3.2.5 | Child Labour

As established during the NBA and consultative process, legislation regarding child labour in Pakistan requires more effective implementation and enforcement at the ground level. Additionally, lapses in procedural safeguards such as the appointment of labour inspection mechanisms hinder progress. Furthermore, greater consensus and coherence regarding the definitions of child labour, hazardous work, and the worst forms of child labour is also needed. The State of Pakistan is committed to fulfilling its obligation to eliminate child labour as per the Constitution, and the Convention on the Rights of the Child, ILO Convention No. 138 (Minimum Age), ILO Convention No. 182 (Worst Forms of Child Labour), as well as other international and domestic legal instruments. Additionally, in March 2019, the Ministry of Human Rights, with the support of UNICEF, launched a national Child Labour Survey. The results of this survey will be used to generate evidence-based cross-sectoral responses to support the eradication of child labour across Pakistan.

#### Proposed Actions Federal

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51. Conduct a national study to determine progress made against the elimination of child labour in all its forms by 2025 in line with SDG 8.7, and provide recommendations and actions for rectification of gaps.

**Performance indicator(s):** (i) Amendment of law

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

52. Amend the Children (Pledging of Labour) Act 1933 to raise the penalties payable, by both parents/guardians and employers, for the pledging and employment of children.

**Performance indicator(s):** (i) Amendment of law

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

#### Federal and Provincial

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53. Pass legislation, and amend existing legislation where applicable, and ensure implementation, on Employment of Children to (1) raise the age of a child, as defined by the legislation, to the compulsory school-going age of 16, per Article 25-A of the Constitution; (2) prohibit hazardous work under the age of 18; (3) raise the penalties payable for violations; and (4) include domestic work amongst schedule of hazardous occupations.

**Performance indicator(s):** (i) Legislation or amendments enacted

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

54. Conduct nationwide awareness and advocacy campaigns on children’s fundamental right to education and the elimination of child labour.

**Performance indicator(s):** (i) Number of awareness-raising activities

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

### 3.2.6 | Forced or Bonded Labour

As established during the NBA and consultative process, there is a strong Federal and Provincial legislative framework to address forced labour, however, challenges remain in implementation at the ground-level, including low conviction rates, and a lack of awareness amongst bonded labourers about their rights under the law.

The Constitution of Pakistan and Pakistan’s core criminal legislation, the Pakistan Penal Code, prohibit forced or bonded labour. The Prevention of Trafficking in Persons Act 2018 and the Bonded Labour (Abolition) Act 1992 also prohibit bonded labour. Additionally, the Bonded Labour (Abolition) Act calls for the establishment of Vigilance Committees at the district level to monitor and report any instances of forced or bonded labour. Pakistan has ratified ILO Convention No. 29 (Forced Labour) and ILO Convention 105 (Abolition of Forced Labour), and is committed to eliminating forced or bonded labour.

### Proposed Actions Federal

55. Ratify Protocol to ILO Convention No. 29 (Forced Labour).

**Performance indicator(s):** (i) Steps taken required prior to ratification; (ii) Ratification of Convention

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

56. Amend the Bonded Labour (Abolition) Act 1992 to provide more stringent punishments against those violating the law and to incorporate provisions on Government aid and rehabilitation programs for victims of forced or bonded labour.

**Performance indicator(s):** (i) Amendment to law

**UN Guiding Principle(s):** 1, 3, 25

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth;  
Goal 16 – Peace, Justice and Strong Institutions

57. Amend Section 374 of the Pakistan Penal Code (in relation to unlawful compulsory labour) to increase the sentence from the current one-year sentence up to a maximum of life imprisonment for the most severe violations.

**Performance indicator(s):** Amendment to the Pakistan Penal Code

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth;  
Goal 16 – Peace, Justice and Strong Institutions

### Federal and Provincial

58. Ensure the establishment, proper functioning, and introduce capacity-building programmes for District Vigilance Committees, established under the Bonded Labour System (Abolition) Act 1992.

**Performance indicator(s):** (i) Number of District Vigilance Committees established and functional; (ii) Number of capacity-building activities

**UN Guiding Principle(s):** 1, 3, 8

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth;  
Goal 16 – Peace, Justice and Strong Institutions

### 3.2.7 | Occupational Health and Safety

As established during the NBA and consultative process, major challenges in Pakistan regarding occupational health and safety include an outdated legislative and policy framework which tends to limit its scope to factories and industrial sites. Additionally, there is a lack of consensus on definitions and criteria for what counts as a safe and healthy working environment. Furthermore, there is limited awareness or acknowledgement of the potential long-term impacts on the health of workers, specific to different industries and occupations, and the obligations of employers in this regard.

Over the course of 2020 and 2021, COVID-19 has brought occupational health and safety to the forefront, resulting in ongoing national and

local debates on the right to health. Both the State and businesses are focused on the resumption and normalisation of economic activity, but this must be done in tandem with appropriate health and safety protections and preventive measures.

## Proposed Actions Federal

59. Amend the Workmen's Compensation Act 1923 with an updated list of scheduled diseases, including COVID-19, against which compensation can be claimed.

**Performance indicator(s):** (i) Amendment with updated list

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth

60. Update the Pakistan Penal Code to provide a comprehensive list of occupational hazards and the ambit of protection therein.

**Performance indicator(s):** (i) Amendment with updated list

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

61. Ratify ILO Convention No. 155 (Occupational Safety and Health) and ILO Convention No. 187 (Promotional Framework for Occupational Safety and Health).

**Performance indicator(s):** (i) Steps taken required prior to ratification; (ii) Ratification of Conventions

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

## Federal and Provincial

62. Bring up-to-date health and safety legislation, standards, rules and guidelines, and independent enforcement mechanism for all sectors, with immediate priority allotted to the most hazardous sectors based on available data or reported concerns, and account for the differentiated needs of workers, including women, elderly workers, and others.

**Performance indicator(s):** (i) Number of new or updated laws, standards, rules, guidelines, and independent enforcement mechanisms

**UN Guiding Principle(s):** 1, 3

**Relevant SDG(s):** Goal 3 – Good Health and Well-being; Goal 5 – Gender Equality; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

### 3.2.8 | Access to Remedy

As established during the NBA and consultative process, challenges in terms of access to remedy include unequal levels of access to remedy for women and vulnerable or marginalised groups, potentially high costs of litigation, lengthy delays in courts, and lack of awareness about legal rights and existing remedial mechanisms.

The State of Pakistan commits to improving the effectiveness of its judicial and non-judicial grievance redressal mechanisms, and also expects businesses to ensure a reduction in barriers to accessing internal remedies within organisations. With respect to non-judicial grievance mechanisms (State-based and non-State-based), the principles of transparency, impartiality and predictability must be adhered to.

### Proposed Actions Federal

63. Conduct a national mapping exercise to identify existing reporting procedures for human rights violations occurring from business activity, and make recommendations for improved effectiveness.

**Performance indicator(s):** (i) Mapping exercise report

**UN Guiding Principle(s):** 1, 25

**Relevant SDG(s):** Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

64. Conduct a national study on barriers to entry and advancement of women in the justice sector.

**Performance indicator(s):** (i) National study report

**UN Guiding Principle(s):** 1, 25

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions

### Federal and Provincial

65. Establish Labour Courts in all districts, and review the existing framework of Labour Courts, including assessment of gender-responsiveness, and utilise the findings to increase and strengthen functioning of Courts to provide for the efficient handling of industrial disputes and the effective protection of labour rights.

**Performance indicator(s):** (i) Number of newly established Labour Courts; (ii) Review reports; (iii) Budgetary allocations

**UN Guiding Principle(s):** 1, 3, 25, 26

**Relevant SDG(s):** Goal 8 - Decent Work and Economic Growth; Goal 16 - Peace, Justice and Strong Institutions

66. Establish Child Protection Courts in all districts, and review the framework of existing Child Protection Courts to include the authority to direct the training and rehabilitation of victims of child labour.

**Performance indicator(s):** i) Number of newly established Child Protection Courts; (ii) Review reports; (iii) Budgetary allocations

**UN Guiding Principle(s):** 1, 3, 25, 26

**Relevant SDG(s):** Goal 8 - Decent Work and Economic Growth; Goal 16 - Peace, Justice and Strong Institutions

67. Establish and strengthen existing guidelines and compile best practices for the Judiciary to ensure effective remediation of human rights abuses occurring through business activity.

**Performance indicator(s):** (i) Development of guidelines and best practices; and (ii) Dissemination of Guidelines

**UN Guiding Principle(s):** 1, 3, 25, 26

**Relevant SDG(s):** Goal 16 - Peace, Justice and Strong Institutions

68. Ensure the effective functioning of public grievance redressal mechanisms such as the Ombudsperson Offices and enhance their capacity to resolve complaints.

**Performance indicator(s):** (i) Development of Capacity-building Initiatives; and (ii) Number of Capacity-building Trainings

**UN Guiding Principle(s):** 1, 3, 27

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

## Provincial

69. Conduct compliance review to verify that effective and gender responsive organizational remedial mechanisms, including Inquiry Committees, are established in all public and private enterprises.

**Performance indicator(s):** (i) Compliance review report

**UN Guiding Principle(s):** 1, 2, 3, 12, 15, 22, 23, 25, 28, 29

**Relevant SDG(s):** Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities



04

## STATE EXPECTATIONS OF BUSINESS ENTERPRISES

To facilitate and guide business enterprises in ensuring compliance with and supporting the effective implementation of the NAP priority areas and the UNGPs, the State of Pakistan expects business enterprises to:

1. Evaluate their compliance with all applicable domestic laws relevant to the respect for human rights in business activity, and provision of corrective or remedial action in response to potential, ongoing, or past human rights violations resulting directly from their activity or through their business relationships across their value chains.
2. Ensure the elimination of child labour, forced or bonded labour, and all forms of modern slavery from their business operations and supply chains. This may be expedited through the utilisation of effective and thorough human rights due diligence (See Point 6 below).
3. Prevent, monitor, and address all forms of workplace discrimination and harassment. This can be done by complying with the Anti-Workplace Harassment Act through the establishment and operationalisation of Inquiry Committees for investigating claims of harassment within the workplace.
4. Develop and make publicly available a comprehensive human rights corporate policy which includes protection for women and vulnerable or marginalised groups.
5. Ensure that human rights corporate policies are communicated to their employees which can be done through mandatory human rights trainings at the start of employment and through regular trainings thereafter. Specific mandatory trainings should also be conducted for all personnel, including managerial and hiring staff, on anti-discrimination and equality at the workplace, focusing on anti-harassment, equal opportunity, workplace security and maternity leave/pay.
6. Establish adequate human rights due diligence mechanisms to identify, prevent, and remedy human rights impacts. Human rights due diligence should consider both internal risks that stem directly from business operations as well as external risks, which

relate to all other entities that the business work with across their operations or are linked with through their value chains. Human rights due diligence should be carried out before commercial operations and business activities, proportionate to the size and scope of the enterprise and the scale and complexity of its potential human rights impacts, and on a continuous basis to ensure that integrated findings from impact assessments shape future business decisions. Businesses should also ensure that the risks identified through due diligence and corrective actions taken are adequately reported and communicated to stakeholders, preferably in the form of an annual human rights due diligence report.

7. Identify and manage the human rights impacts of their operations during COVID-19 by using tools such as the Human Rights Due Diligence and COVID-19 Rapid Self-Assessment tool developed by UNDP within the BHR framework.<sup>12</sup>
8. Develop key performance indicators corresponding to the achievement of human rights goals and routinely review and update them to reflect national legislative and policy changes.
9. Ensure that all employees are given formal contracts of employment, which lay down their rights and obligations.
10. Develop, embed, and implement a corporate remedy strategy, which outlines the standard established by the business to provide for redressal of human rights complaints. Business enterprises are encouraged to provide publicly available information in relation to the redressal mechanisms (to relevant stakeholders) and how the same are used (through specific trainings to employees) to ensure that complainants understand avenues of redressal if their rights have been violated.
11. Make available remediation for human rights abuses in the supply and value chains of a business even when a business is not directly involved in a human rights violation but has the potential to adversely affect human rights.

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12. UNDP. Human Rights Due Diligence and COVID-19: Rapid Self-Assessment for Business. <https://www.undp.org/publications/human-rights-due-diligence-and-covid-19-rapid-self-assessment-business>

12. Provide remedies to individuals who reside in the communities in which they operate. For this purpose, businesses should ensure that they have an open-door policy and are encouraged to enforce the right of access to information by providing publicly available information on how their human rights standards are maintained.
13. In addition to the UNGPs, be cognisant of and guided by international guidelines and principles such as the Gender Dimensions of the UNGPs<sup>13</sup>, OECD Guidelines for Multinational Enterprises<sup>14</sup>, OECD Due Diligence Guidance for Responsible Business Conduct<sup>15</sup>, ILO's Fundamental Principles and Rights at Work<sup>16</sup>, The Ten Principles of the United Nations Global Compact<sup>17</sup>, Women's Empowerment Principles<sup>18</sup>, OECD-FAO Guidance for Responsible Agricultural Supply Chains<sup>19</sup>, OECD Due Diligence Guidelines for Responsible Supply Chains in the Garment and Footwear Sector<sup>20</sup>, OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector<sup>21</sup>, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>22</sup>, OECD Practical

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13. OHCHR and UNDP. Gender Dimensions of the Guiding Principles on Business and Human Rights. <https://www.ohchr.org/Documents/Issues/Business/BookletGenderDimensionsGuidingPrinciples.pdf>
  14. OECD. OECD Guidelines for Multinational Enterprises. [https://www.oecd.org/daf/inv/mne/48004323.pdf?\\_ga=2.151148985.1091937179.1621413404-1496119172.1618375870](https://www.oecd.org/daf/inv/mne/48004323.pdf?_ga=2.151148985.1091937179.1621413404-1496119172.1618375870)
  15. OECD. OECD Due Diligence Guidance for Responsible Business Conduct. <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>
  16. ILO. ILO Declaration on Fundamental Principles and Rights at Work. <https://www.ilo.org/declaration/lang--en/index.htm>
  17. United Nations Global Compact. Ten Principles. <https://www.unglobalcompact.org/what-is-gc/mission/principles>
  18. Women's Empowerment Principles. <https://www.weps.org/>
  19. OECD and FAO. OECD-FAO Guidance for Responsible Agricultural Supply Chains <https://www.oecd.org/daf/inv/investment-policy/rbc-agriculture-supply-chains.htm>
  20. OECD. OECD Due Diligence Guidelines for Responsible Supply Chains in the Garment and Footwear Sector. <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-Garment-Footwear.pdf>
  21. OECD. OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector. <https://mneguidelines.oecd.org/stakeholder-engagement-extractive-industries.htm>
  22. OECD. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. <https://mneguidelines.oecd.org/mining.htm>

Actions for Companies to Identify and Address the Worst Forms of Child Labour in Mineral Supply Chains<sup>23</sup>, IFC Performance Standards<sup>24</sup>, and other guidelines and standards applicable to their respective sectors.

14. Abide by relevant international standards under the International Organisation for Standardization, particularly ISO 26000 – Social Responsibility<sup>25</sup>, and ISO 45001 – Occupational Health and Safety.<sup>26</sup>
15. Businesses are also encouraged to participate in initiatives such as the UN Global Compact<sup>27</sup>, Fair Labor Association<sup>28</sup>, Global Network Initiative<sup>29</sup>, Ethical Trading Initiative<sup>30</sup>, Extractive Industries Transparency Initiative<sup>31</sup>, and similar networks, which will allow them to better understand and implement international human rights standards within the business context.
16. Utilise the available guidelines, resources, and toolkits on how to ensure respect for human rights in business activity provided by organisations such as the Business and Human Resource Centre<sup>32</sup>, Danish Institute of Human Rights<sup>33</sup>, Shift<sup>34</sup>, and several others.

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23. OECD. OECD Practical Actions for Companies to Identify and Address the Worst Forms of Child Labour in Mineral Supply Chains. <https://mneguidelines.oecd.org/child-labour-risks-in-the-minerals-supply-chain.htm>

24. International Finance Cooperation. Performance Standards. [https://www.ifc.org/wps/wcm/connect/Topics\\_Ext\\_Content/IFC\\_External\\_Corporate\\_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards](https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards) 25. ISO 26000. <https://www.iso.org/iso-26000-social-responsibility.html>

26. ISO 45001. <https://www.iso.org/iso-45001-occupational-health-and-safety.html>

27. United Nations Global Compact. <https://www.unglobalcompact.org/>

28. Fair Labor Association. <https://www.fairlabor.org/>

29. Global Network Initiative. <https://globalnetworkinitiative.org/>

30. Ethical Trading Initiative. <https://www.ethicaltrade.org/>

31. Extractive Industries Transparency Initiative. <https://eiti.org/>

32. Business and Human Rights Resource Centre. <https://www.business-humanrights.org/en/>

33. Danish Institute of Human Rights. <https://www.humanrights.dk/business-human-rights>

34. Shift. <https://shiftproject.org/>

## ANNEXURES

### Annex I | Implementation Plan

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
1	Conduct a mapping exercise to chart national progress made against, and steps required to advance, the four elements of the Fundamental Principles and Rights at Work, that is: (1) the eradication of modern slavery; (2) abolishment of child labour; (3) elimination of discrimination in business activity and the workplace, including the gender pay gap, and; (4) protection of the right to freedom of association	Ministry of Human Rights; Ministry of Overseas Pakistanis and Human Resource Development; Ministry of Commerce		(I) Mapping exercise report	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
2	Review framework, engage with, and build the capacity of, National Human Rights Institutions to promote and sustain effective support to the implementation and oversight of the protection, respect, and remediation of human rights in the context of business activity.	Ministry of Human Rights; National Commission for Human Rights; National Commission for Child Welfare and Development; National Commission on the Status of Women; National Commission on the Rights of the Child	Provincial Human Rights Departments; Provincial Labour Departments	(I) Review report; (ii) Number of capacity-building activities conducted with NHRIs in Pakistan	3, 8, 25, 27	Goal 16 – Peace, Justice & Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
3	<p>Conduct a mapping exercise, including a consultative process, to assess the national legislative, policy, and regulatory framework relevant to human rights in the digital economy, including freelance work and the gig economy, and gather recommendations on steps needed to ensure the application of the Protect, Respect, and Remedy framework to the digital economy.</p>	<p>Ministry of Human Rights; Ministry of Information Technology and Telecommunication</p>		<p>(I) Mapping exercise report (2) Number of consultations held</p>	<p>1, 2, 3, 8</p>	<p>Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions</p>

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
4	<p>Review and update existing legislation to strengthen the protection of human rights within the context of business activity, incorporating gender equality as a foundational and cross-cutting theme, in line with Pakistan's Constitutional and international obligations, and in support of the framework of the UNGPs.</p>	<p>Ministry of Human Rights; Ministry of Law and Justice</p>	<p>Cabinet Secretariat; Provincial Human Rights Departments; Provincial Social Welfare Departments; National Commission on Human Rights; National Commission on Child Welfare and Development; National Commission on the Status of Women; Ministry of Industries and Production; Ministry of Commerce; Chambers of Commerce; Labour Unions; Ministry of Planning, Development and Reform; Ministry of Parliamentary Affairs; Ministry of Climate Change; Ministry of Interior; Ministry of Federal Education &amp; Professional Training; Ministry of Inter-Provincial Coordination; Ministry of Overseas Pakistanis and Human Resource Development; Ministry of Religious Affairs and Interfaith Harmony; Parliamentary Functional Committee on Human Rights; National Commission on the Rights of the Child</p>	<p>(i) Review report; (ii) Number of laws updated</p>	<p>1, 3</p>	<p>Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions</p>

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
5	Issue and disseminate BHR guidelines for business enterprises in line with the NAP—its priority areas, proposed actions and State expectations of business enterprises—and with regards to non-financial reporting on corporate human rights policies, human rights due diligence, and remedial mechanisms.	Ministry of Human Rights; Ministry of Industries & Production; Ministry of Commerce	Ministry of Law & Justice; Ministry of Interior; Provincial Human Rights Departments; Securities and Exchange Commission of Pakistan; Ministry of Overseas Pakistanis and Human Resource Development; National Commission for Child Welfare and Development; National Commission on the Rights of the Child	(i) Development of Guidelines; (ii) Number of businesses to which Guidelines are disseminated	1, 2, 3	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
6	Strengthen regulations, with respect to overseas labour abuse, on the registration and oversight of recruitment agencies providing overseas employment opportunities, and work with other Governments to ensure safe and just labour migration.	Ministry of Overseas Pakistanis and Human Resource Development	Ministry of Foreign Affairs; Ministry of Human Rights; Provincial Labour Departments; Ministry of Interior; Provincial Human Rights Departments; Provincial Home Departments; Provincial Overseas Pakistanis Commissions	(i) MOUs signed with other Governments; (ii) Number of recruitment agencies registered; (iii) Number of regulations strengthened	1, 2, 3	Goal 8 – Decent Work and Economic Growth; Goal 17 – Partnerships for the Goals
7	Clear the backlog of cases in Courts, and explore the feasibility of strengthening and promoting alternate dispute resolution mechanisms for the fair, effective, and timely redressal of human rights violations resulting from business activity.	Federal and Provincial District Courts; Federal and Provincial High Courts; Supreme Court of Pakistan	Ministry of Human Rights; Ministry of Law & Justice; Law & Justice Commission of Pakistan; Human Rights Cell, Supreme Court; Federal and Provincial Judicial Academies; Federal and Provincial Prosecution Departments	(i) Number of cases resolved; (ii) Usage of alternate dispute resolution mechanisms	1, 3, 8, 25, 26, 27, 28	Goal 16 – Peace, Justice and Strong Institutions



	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
8	Incorporate mandatory principles of Business and Human Rights, including the NAP and the UNGPs, into technical and vocational training.	Provincial Education Departments; Provincial Human Rights Departments; Provincial Technical and Vocational Training Authorities	Ministry of Social Welfare and Small Industries; Business Community; CSOs & NGOs	(i) Number of TVET programs incorporating principles of BHR, NAP, and UNGPs	2, 3, 8	Goal 4 – Quality Education; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities
9	Pass the Whistleblower Protection and Vigilance Commission Bill 2019 to ensure protection of whistle-blowers disclosing information related to financial discrepancies and corruption.	Ministry of Human Rights; Ministry of Law and Justice		Enactment of the Whistleblower Bill	1, 3	Goal 16 – Peace, Justice and Strong Institutions
10	Review and update the Public Procurement Regulatory Authority Rules to incorporate human rights due diligence as a key criterion in the bidding and evaluation process and give preference to businesses that demonstrate actions taken to meet their human rights obligations.	Ministry of Law and Justice; Ministry of Human Rights; Public Procurement Regulatory Authority	Provincial Law Departments; Provincial Human Rights Departments; Ministry of Commerce; Provincial Commerce Departments; Ministry of Industries and Production; Provincial Industries & Production Departments; Federal Cabinet; Provincial Governments; NGOs & INGOs with relevant expertise on public procurement; legal experts	(i) Updated rules incorporating human rights due diligence	1, 2, 3, 4, 5, 6, 8, 9	Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
11	Develop a model Code of Conduct, making explicit the relationship between business and human rights, for businesses that are State owned, controlled or which work with the State.	Ministry of Human Rights; Ministry of Industries and Production; Ministry of Commerce	Ministry of Law & Justice; Ministry of Planning and Development; Provincial Human Rights Departments; Securities and Exchange Commission of Pakistan; Provincial Labour Departments	(i) Development of a Code of Conduct; (ii) Number of businesses to which the Code of Conduct is disseminated; (iii) Number of businesses that formally announce the adoption of Code of Conduct	1, 2, 3, 4, 5, 6, 8, 9	Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 16 – Peace, Justice and Strong Institutions
12	Further strengthen judicial processes and create awareness on issues related to Anti-Money Laundering/Counter Terror Financing (AML/CTF) to encourage financial transparency.	Ministry of Human Rights; Ministry of Law and Justice; Anti-Corruption and Economic Crime Wing (Federal Investigation Agency);	National Accountability Bureau (NAB); Securities and Exchange Commission of Pakistan; State Bank of Pakistan; Provincial Home Departments; Provincial Finance Departments; Provincial Law Departments; Supreme Court of Pakistan; High Courts; District Courts; Federal and Provincial Judicial Academies; Federal and Public Service Commissions; Anti-Narcotics Force (ANF); Anti-Terror Courts; Provincial Anti-Corruption Bodies	Number of trainings on AML/CTF	1, 2, 3, 25	Goal 16 - Peace, Justice and Strong Institutions
13	Ratify ILO Convention No. 190 (Violence and Harassment).	Federal Cabinet of Pakistan; Ministry of Foreign Affairs; Ministry of Law & Justice	Federal and Provincial Ombudspersons on Harassment; Ministry of Human Rights	(i) Steps taken required prior to ratification; (ii) Ratification of Convention	1, 3	Goal 5 – Gender Equality; Goal 16 - Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
14	Enact proposed amendments to the Protection Against Harassment of Women at the Workplace Act, including but not limited to clarifying, and expanding where required, definitional ambiguities in light of the objective and purpose of the Act, and to promote effective and comprehensive safeguarding against all forms of harassment in all workplaces.	Ministry of Law & Justice		(i) Enacting of proposed amendments	1, 3, 25, 26, 27, 28	Goal 5 – Gender Equality; Goal 16 - Peace, Justice and Strong Institutions
15	Conduct a national study to determine the sectors in which significant gender disparity is prevalent, and utilise the findings of the study to assess and develop a policy regarding the mandatory reservation of quotas for women in different sectors.	Ministry of Human Rights; National Commission on the Status of Women	Ministry of Commerce; Ministry of Industries and Production; Provincial Commissions on the Status of Women; Ministry of Law & Justice; Provincial Human Rights Departments; Ministry of Overseas Pakistanis and Human Resource Development; Provincial Women Development Departments; CSOs and NGOs; Business Community	(i) Report of national study; (ii) Number of consultations for the study; (iii) Development of a policy based on the consultations and baseline assessment	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
16	Review, and amend where required, existing laws pertaining to all forms of violence against women and girls, and ensure effective functioning of Gender-Based Violence Courts.	Ministry of Human Rights; National Commission on the Status of Women; Ministry of Law and Justice		(i) Review report; (2) Number of laws amended	1, 2, 3, 8, 25, 26, 27, 28	Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
17	Create Women and Transgender Persons' Business Incubation Centres, and strengthen and facilitate existing ones in all Provinces, and provide equal funding opportunities for women and transgender-led businesses.	Ministry of Finance, Revenue and Economic Affairs; Ministry of Human Rights; Ministry of Commerce	Ministry of Industries and Production; Ministry of Information Technology; Provincial Human Rights Departments; National Commission on Human Rights; National Commission on the Status of Women; Ministry of Law & Justice; Provincial Law Departments; Provincial Commerce Departments; Provincial Industries and Production Departments; NGOs and CSOs; Federal and Provincial Women Development Departments; Business Community	i) Number of Centres created or strengthened	1, 2, 3, 5, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities
18	Develop Labour Policies, or ensure implementation of existing Policies, which introduce a requirement for businesses to create an Internal Equal Opportunity Committee that receives complaints and conducts inquiries regarding wage gaps and discriminatory hiring practices.	Ministry of Law & Justice; Ministry of Human Rights; Provincial Industries Department	National Commission on Human Rights; National Commission on the Status of Women; Provincial Human Rights Departments; Ministry of Overseas Pakistanis and Human Resource Development; Provincial Labour Departments; Pakistan Federation of United Trade Unions; CSOs and NGOs; Business Community	(i) Policies developed or implemented; (ii) Notification of requirement regarding internal equal opportunity committee; (iii) Number of businesses that have established an equal opportunity committee	1, 2, 3, 22, 27, 28, 29, 30	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
19	Strengthen existing, and develop where required, civil remedies for discriminatory action based on gender, ethnicity, religion, disability, age, or any other factor.	Ministry of Human Rights; Ministry of Law & Justice	Federal and Provincial Commissions on the Status of Women; Ministry of Commerce; Securities and Exchange Commission of Pakistan; Provincial Human Rights Departments; Provincial Women Welfare Departments; Ministry of Overseas Pakistanis and Human Resource Development; Federal and Provincial Ombudspersons against Harassment of Women at the Workplace; CSOs & NGOs; Business Community	(i) Number of remedies developed or strengthened	25, 26, 29	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
20	Increase access to low-interest or interest-free loans to women and vulnerable or marginalised groups.	Provincial Governments; State Bank of Pakistan	Provincial Commissions on the Status of Women; Social Welfare & Women Development Department; CSOs & NGOs; Business Community; Planning and Development Department; Industries & Commerce Department; Labour Department	i) Number of consultations with financial institutions (private & public); (ii) Establishing a policy framework in conjunction with women's advocacy groups; (iii) Implementation of policy	1, 2, 3, 8, 12	Goal 1 – No Poverty; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
21	Provide capacity-building support in the value chain for women and vulnerable or marginalised groups, and build awareness about their rights under the law as well as available remedial mechanisms in case of violations of their human rights in business activity or the workplace.	Non-Formal Education and Human Rights Department; Vocational Training Authorities; Ministry of Social Welfare and Small Industries; Women Development Department	Provincial Technical and Vocational Training Authorities ; Provincial Social Welfare Departments; Provincial Educational Departments; Provincial Population Welfare Department; NGOs & CSOs; Business Community	(i) Number of capacity-building and awareness-raising activities	1, 2, 3, 8, 11, 12, 25, 26, 27, 28, 29	
22	Streamline regulatory requirements and procedures for business enterprises, aiming to reduce barriers to entry in business activity faced by women and vulnerable or marginalised groups.	Provincial Commerce Departments; Provincial Social Welfare & Women Development Departments	Provincial Commissions on the Status of Women; Law, Parliamentary Affairs & Human Rights Department; CSOs & NGOs; KP Public Service Commission; Administration Department	(i) Number of regulatory requirements and procedures streamlined	1, 2, 3, 8	Goal 1 – No Poverty; Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
23	Develop Provincial policies and mechanisms, or ensure implementation of existing ones, related to the non-discrimination and inclusion of women and vulnerable or marginalised groups in business activity, and the provision of safe, healthy, and dignified working spaces for women and vulnerable or marginalised groups in the workplace.	Provincial Governments	Provincial Education Departments; Provincial Human Rights Departments; Provincial Women Development Departments; Provincial Commissions on the Status of Women; Provincial Planning and Development Departments; Provincial Social Welfare Departments; Ombudsperson; Business Community; CSOs & NGOs; Provincial	(i) Policies developed; (ii) Number of safe, healthy, and dignified working spaces established	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
24	Identify areas through a consultative process where additional funds need to be allocated to address gender inequality in business activity and the workplace.	Provincial Women Development Departments; Provincial Planning and Development Department	Provincial Finance Departments; Provincial Law Departments; Provincial Commission on the Status of Women; CSOs and NGOs; Ombudsperson; Provincial Workers Welfare Bodies; Provincial Social Welfare Departments; Provincial Industries Departments; Provincial Commerce Departments; Provincial Local Government Departments	(i) Number of multi-stakeholder consultations for identification of areas that require budgetary allocation; (ii) Report on areas identified where additional funding is required	1, 2, 3, 8, 25	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
25	Increase awareness about harassment at the workplace and gender-based discrimination, and existing reporting and remedial mechanisms, such as the Provincial Ombudsperson.	Provincial Women Development Departments; Provincial Commissions on the Status of Women	Media; Business Community; CSOs, NGOs and INGOs; Information, Science and Technology Department; Training, Management and Research Wing, SGA&CD Department; Provincial Public Service Commissions; Provincial Judicial Academies; Provincial Industries Departments; Provincial Commerce Departments ; Provincial Labour Departments; Provincial Information Departments	(i) Number of awareness-raising activities	2, 3, 8, 27	Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions
26	Conduct Provincial mapping exercises to comprehensively assess existing challenges and deficits, and provide recommendations to eliminate discriminatory practices against women and vulnerable or marginalised groups in business activity or in the workplace.	Provincial Planning Departments; Provincial Law Departments; Provincial Human Rights Departments	Provincial Commissions on the Status of Women; Provincial Labour Departments; Provincial Social Welfare Departments; CSOs & NGOs;	(i) Mapping exercise report	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities



	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
27	Build, or further strengthen existing, partnerships with and facilitate businesses to increase disability inclusion in business activity and at the workplace.	Provincial Special Education Departments; Provincial Social Welfare Departments; Provincial Bait-ul-Maal Departments / Bodies for Persons with Disabilities	Provincial Human Rights Departments; Provincial Education Departments; Provincial Labour Departments; Provincial Law Departments;; Provincial Management and Professional Development Departments; Provincial Planning and Development Department; Provincial Health Departments	(i) Number of partnerships and activities with businesses on disability inclusion	2, 3, 8, 11, 12	Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities
28	Encourage private and public sector businesses to reduce gender gap and consider developing quotas to ensure adequate participation of women in the economy.	Provincial Governments; Provincial Labour Departments	Provincial Human Rights Departments; Provincial Planning Departments; Provincial Social Welfare Departments; Provincial Law Departments; Provincial Women Development Departments	(i) Consultations with relevant Government/ private entities and stakeholders; (ii) Formulation of Policy on quotas for marginalised groups; (iii) Number of public & private organizations that have adopted the Policy	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 10 – Reduced Inequalities
29	Establish Provincial Entrepreneurial Advisory Cells for and led by women and vulnerable or marginalised groups.	Provincial Small and Medium Enterprises Development Authorities; Provincial Chambers of Commerce & Industry		(i) Number of cells established	2, 3, 8, 11, 12	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 9 – Industry, Innovation, and Infrastructure; Goal 10 – Reduced Inequalities

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
30	Develop mechanisms to ensure vocational training of female prisoners to rehabilitate them and ensure their participation in the economy after completion of their prison sentences.	Provincial Home Departments; Provincial Women Development Departments; Provincial Vocational Training Authorities	Provincial Human Rights Departments; Provincial Commissions on the Status of Women			
31	Develop policy, including a proposed regulatory model, on the requirement of human rights due diligence for the approval of large-scale projects where the business activity poses a significant risk to the rights of a community at large, and incorporate into relevant existing Rules and Guidelines.	Ministry of Commerce; Ministry of Human Rights; Ministry of Industries and Production; Provincial Industries & Production Departments	Provincial Commerce Departments; Provincial Human Rights Investment; Board of Environmental Protection Agency; Ministry of Climate Change; Ministry of Energy; Provincial Women Development Departments	(i) Policy development; (ii) Incorporation into relevant existing Rules and Guidelines	1, 2, 3, 4, 5, 6, 8, 17, 23	Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions
32	Conduct feasibility study of human rights certification and provision of market incentives for businesses which demonstrate respect for human rights across their operations, including conducting human rights due diligence and publicising their efforts.	Ministry of Commerce; Ministry of Industries and Production		(i) Feasibility study report	1, 2, 3, 8	Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
33	Conduct feasibility study on the future enactment of mandatory human rights due diligence legislation in Pakistan, studying the legislative, regulatory, and economic framework in this regard.	Ministry of Commerce; Ministry of Industries and Production		Feasibility study report	1, 2, 3, 8	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions
34	Conduct a study on the potential impact of the future enactment of mandatory human rights due diligence legislation by major trading partners, such as the European Union, on Pakistan's competitiveness in export markets, inflows of foreign direct investment, Pakistan's role in global supply chains, and schemes such as GSP+.	Ministry of Commerce		(i) Assessment report	1, 2, 3, 8, 9	Goal 8 – Decent Work and Economic Growth; Goal 12 – Responsible Consumption and Production; Goal 17 – Partnerships for the Goals

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
35	Develop and launch a Human Rights Due Diligence Partnership Project with the private sector, for the purpose of establishing a framework and standards for human rights due diligence reporting.	Federal & Provincial Governments; Ministry of Human Rights; Provincial Human Rights Departments	Ministry of Climate Change; Ministry of Commerce and Textile; Provincial Commerce Departments; Ministry of Communications; Provincial Communications Departments; Ministry of Energy; Provincial Energy Departments; Ministry of Finance, Revenue and Economic Affairs; Ministry of Industries & Production; Ministry of Law & Justice; Provincial Law Departments; Ministry of Inter-Provincial Coordination, Pakistan Environmental Protection Agency; Ministry of Health; Provincial Health Departments; Federal and Provincial Ombudspersons	(i) Launch of Partnership Project	2, 3, 11, 12, 15, 17, 23	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
36	Establish voluntary and common standards for conducting and reporting human rights due diligence in business activity, applicable to both the direct operations and across the value chains of public and private enterprises.	Provincial Governments; Ministry of Human Rights	Ministry of Law and Justice; Ministry of Industries and Production; Ministry of Commerce; Provincial Human Rights Departments; Provincial Law Departments; Provincial Commerce Departments; Provincial Industries and Commerce	(i) Development and dissemination of voluntary standards in line with international best practices	1, 2, 3, 11, 12, 15, 17, 23	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions
37	Adopt a National Policy on Home Based Workers (HBW).	Ministry of Human Rights; National Commission on Human Rights; Ministry of Overseas Pakistanis and Human Resource Development	National Commission on the Status of Women; Provincial Labour & Human Resource Departments; Provincial Human Rights Departments; Provincial Commissions on the Status of Women; Provincial Child Welfare Departments/Bureaus; National Commission for Child Welfare and Development; Provincial Law Departments; Ministry of Foreign Affairs; Ministry of Commerce; Ministry of Planning and Development; Provincial Human Rights Departments; CSOs & NGOs	(i) Adoption of Policy	1, 2, 3	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
38	Ratify ILO Convention No. 177 (Home Workers).	Federal Cabinet of Pakistan	Ministry of Human Rights; Ministry of Law & Justice; Ministry of Foreign Affairs; Provincial Human Rights Departments; Provincial Commissions Ministry of Overseas Pakistanis and Human Resource Development; Provincial Child Welfare Departments/Bureaus; National Commission for Child Welfare and Development; Provincial Law Departments; Ministry of Foreign Affairs; Ministry of Commerce; Ministry of Planning and Development; Provincial Human Rights Departments	(i) Steps taken required prior to ratification; (ii) Ratification of Convention	1, 2, 3	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
39	Ratify ILO Convention No. 189 (Domestic Workers).	Federal Cabinet of Pakistan	Ministry of Foreign Affairs; Ministry of Law and Justice; Ministry of Human Rights; Ministry of Parliamentary Affairs; Ministry of Planning, Development and Reform	(i) Steps taken required prior to ratification; (ii) Ratification of Convention	1, 3	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
40	Incorporate the terms of all ratified ILO conventions into the legal framework governing the rights of all workers in Pakistan, including those in the informal economy.	Ministry of Law and Justice; Ministry of Human Rights	Provincial Treaty Implementation Cells; Ministry of Industries and Production; Ministry of Commerce; Provincial Human Rights Departments; Labour/Trade Unions; Business Community; Ministry of Overseas Pakistanis and Human Resource Development; Ministry of Planning, Development and Reform	(i) Amendments made to legislation of High-Level Meetings and consultations with Stakeholders on the scope of the ILO Conventions; (ii) Enactment of relevant legislation; (iii) Development of relevant policies	1, 2, 3	Goal 5 – Gender Quality; Goal 8 - Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
41	Strengthen labour inspection mechanisms, including by ensuring the sufficient funding and capacity of the mechanisms, and conduct regular inspections of business enterprises, including in the informal economy, to safeguard adherence to minimum wage and other labour rights. Ensure inclusion of women as labour inspectors as well.	Provincial Labour and Human Resources Departments	Provincial Industries Departments; Provincial Commerce Departments; Provincial Human Rights Departments; Provincial Mines and Minerals Departments; Provincial Planning Departments; Provincial Social Welfare Departments; Provincial Women Development Departments;	i) Measures taken to strengthen labour inspection mechanisms; (ii) Number of inspections carried out	1, 2, 3, 4	Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
42	Conduct a review process of labour laws, standards, and policies to gauge the differentiated impacts or deficits of these laws, standards and policies on women and vulnerable or marginalised workers, including in the informal economy, and identify and enact as required new or amended laws, standards, or policies.	Provincial Government; Provincial Labour & Human Resources Departments	Provincial Commissions on the Status of Women; Provincial Law Departments; Provincial Human Rights Departments; Provincial Women Development Departments; Provincial Departments of Empowerment of Persons with Disabilities; Provincial Social Welfare Departments; Provincial Labour Departments; Provincial Industries Departments; Provincial Commerce Departments; Provincial Rural Development Departments; Provincial Local Government Departments	(i) Review process reports; (ii) Proposal of Amendments; (iii) Laws, standards, or policies enacted	1, 3, 8	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
43	Register all labour, including in the informal economy, and establish, or strengthen existing, Labour Management Information Systems.	Provincial Government; Industries & Commerce Department; Provincial Labour Inspectorates	Provincial Finance Departments; Provincial Information and Public Relations Departments; Provincial Labour Departments; Provincial Law Departments; Provincial Planning Departments; Provincial Population Welfare Departments; Provincial Revenue Departments; Provincial Social Welfare Departments; Business Community; CSOs & NGOs; Labour/Trade Unions	(i) Number of newly registered individuals; (ii) Establishment or steps taken to strengthen of Labour Management Information Systems	1, 3, 8	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions



	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
44	Formalise all enterprises, including in the informal economy, and digitise business data	Provincial Industries, Mines & Minerals, Labour and Commerce Departments; Provincial Social Welfare and Human Rights Departments	Provincial Information Departments; Provincial Finance Departments; Business Community; Labour/Trade Unions; CSOs & NGOs	(i) Number of enterprises formalised; (ii) Number of businesses that have adopted digitisation	1, 3, 8, 11, 15, 21	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
45	Formalise and strengthen wage payment mechanisms across all sectors, including the informal economy.	Provincial Governments; Provincial Finance Departments; Provincial Labour Departments	Provincial Chief Minister's Inspection Teams; Provincial Home Departments; Provincial Information Departments; Provincial Local Government and Rural Development Departments; Provincial Mines and Minerals Departments; Provincial Planning and Development Departments; Provincial Population Welfare Departments; Provincial Social Welfare Departments; Provincial Education Departments; Provincial , Provincial Education Departments; Provincial Human Rights Departments; Provincial Women Development Departments; Provincial Ombudspersons; Labour/Trade Unions; Business Community	(i) Formalisation of wage payment mechanism; (ii) Number of persons newly covered under formalized wage payment mechanism	1, 3, 8, 11, 13, 15, 17, 22, 23	Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
46	Provide life insurance and ensure compulsory EOBI Registration.	EOBI; Provincial Labour and Manpower Departments	Provincial Industries and Commerce Departments; Provincial Social Welfare Departments; Provincial Education Departments; Provincial Human Rights Departments; Provincial Mines & Minerals Departments; Provincial Health Departments; Provincial Law Departments; Provincial Information Departments; Business Community; Labour/Trade Unions; Chief Minister's Inspection Teams	(i) Number of newly registered establishments/ industries; (ii) Number of newly registered insured persons	1, 2, 3, 8	Goal 1 – No Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
47	Ensure provision of appointment letter or employment contracts as a requirement in the informal economy.	Provincial Governments; Provincial Labour Departments, Provincial Labour Inspectorates	Chief Minister's Inspection Teams; Provincial Human Rights Departments; Provincial Labour Departments; Provincial Law Departments; Business Community; Provincial Mines and Minerals Departments; Provincial Industries, Commerce and Investment Departments; Provincial Local Government Departments; Provincial Social Welfare Departments; Provincial Women Development Departments	(i) Number of employees issued appointment letters/contracts; (ii) Results of labour inspections/spot-checks	1, 2, 3, 11	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
48	Pass Provincial legislation, or strengthen compliance with existing legislation, on Domestic Workers	Provincial Governments; Chief Minister's Inspection Team; Provincial Labour and Human Resource Departments	Provincial Law and Parliamentary Affairs Departments; Business Community; Provincial Local Government Departments; Provincial Social Welfare Departments; Provincial Women Development Departments; Workers Welfare Boards; NGOs & CSOs	(i) Provincial legislation passed or steps taken to strengthen compliance	1, 3	Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
49	Conduct awareness raising campaigns including mass media drives, capacity-building workshops, and industry-specific campaigns about the unique challenges faced by informal workers and steps needed to address them.	Provincial Governments; Information, Science and Technology Departments; Labour & Human Resources Departments	Provincial Finance Departments; Provincial Industries & Commerce Departments; Trade/Labour Unions; Business Community; Provincial Women Development Departments; Provincial Social Welfare Departments; Provincial Department of Empowerment of Persons with Disabilities; Provincial Education Departments; CSOs, INGOs and NGOs	(i) Number of awareness-raising activities; (ii) Number of industries targeted	2, 3, 8	Goal 8 - Decent Work and Economic Growth

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
50	Conduct an Impact Assessment of COVID-19 on the tourism industry (including a gender impact assessment), with a focus on adverse human rights impacts.	Provincial Governments; Tourism Departments	Provincial Finance Departments; Provincial Planning and Development Departments; Provincial Excise and Taxation Departments; Provincial Social Welfare and Human Rights Departments; Provincial Industries, Mines & Minerals Departments; Provincial Labour Departments; Provincial Commerce Departments	(i) Impact Assessment Reports	1, 3, 8	Goal 1 – Zero Poverty; Goal 5 – Gender Quality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 11 – Sustainable Cities and Communities; Goal 12 – Responsible Consumption and Production; Goal 16 – Peace, Justice and Strong Institutions
51	Conduct a national study to determine progress made against the elimination of child labour in all its forms by 2025 in line with SDG 8.7, and provide recommendations and actions for rectification of gaps.	Ministry of Human Rights; National Commission on Human Rights; National Commission on the Rights of the Child		(i) Amendment of law	1, 3	Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
52	Amend the Children (Pledging of Labour) Act 1933 to raise the penalties payable, by both parents/guardians and employers, for the pledging and employment of children.	Ministry of Law and Justice; Ministry of Human Rights	Parliamentary Functional Committee on Human Rights; National Commission on the Rights of the Child	(i) Amendment of law	1, 3	Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
53	Pass legislation, and amend existing legislation where applicable, and ensure implementation, on Employment of Children to (1) raise the age of a child, as defined by the legislation, to the compulsory school-going age of 16, per Article 25-A of the Constitution; (2) prohibit hazardous work under the age of 18; (3) raise the penalties payable for violations; and (4) include domestic work amongst schedule of hazardous occupations.	Ministry of Law and Justice; Provincial Law Departments; Provincial Labour Departments; Ministry of Human Rights;	Ministry of Parliamentary Affairs; Provincial Parliamentary Affairs Departments; Provincial Human Rights Departments; National Commission on the Rights of the Child; National Commission for Child Welfare and Development; Ministry of Inter-Provincial Coordination; Ministry of Interior	(i) Legislation or amendments enacted	1, 3	Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
54	Conduct nationwide awareness and advocacy campaigns on children's fundamental right to education and the elimination of child labour.	Ministry of Human Rights; Provincial Human Rights Departments	National Commission for Child Welfare and Development; Provincial Child Welfare Departments/Bureaus; National Commission on the Rights of the Child; Provincial Social Welfare Departments; Ministry of Federal Education and Professional Training; National Commission on Human Rights; Media; CSOs & NGOs; Ministry of Information, Broadcasting, National History and Literary Heritage; Provincial Education Departments	(i) Number of awareness-raising activities	1, 3	Goal 4 - Quality Education; Goal 8 - Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
55	Ratify Protocol to ILO Convention No. 29 (Forced Labour).	Federal Cabinet; Ministry of Foreign Affairs; Ministry of Law and Justice; Ministry of Human Rights	Ministry of Parliamentary Affairs	(i) Steps taken required prior to ratification; (ii) Ratification of Convention	1, 3	Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
56	Amend the Bonded Labour (Abolition) Act 1992 to provide more stringent punishments against those violating the law and to incorporate provisions on Government aid and rehabilitation programs for victims of forced or bonded labour.	Ministry of Law and Justice; Ministry of Human Rights	Ministry of Parliamentary Affairs; Parliamentary Functional Committee on Human Rights; National Commission on the Rights of the Child	(i) Amendment to law	1, 3, 25	Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
57	Amend Section 374 of the Pakistan Penal Code (in relation to unlawful compulsory labour) to increase the sentence from the current one-year sentence up to a maximum of life imprisonment for the most severe violations.	Ministry of Law and Justice; Ministry of Human Rights	Ministry of Interior; National Commission on the Rights of the Child; Ministry of Parliamentary Affairs; Parliamentary Functional Committee on Human Rights; Federal Judicial Academy	Amendment to the Pakistan Penal Code	1, 3	Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
58	Ensure the establishment, proper functioning, and introduce capacity-building programmes for District Vigilance Committees, established under the Bonded Labour System (Abolition) Act 1992.	Ministry of Human Rights; Provincial Human Rights Departments; Provincial Labour Departments;	Ministry of Planning, Development and Reform; Ministry of Industries & Production; National Commission on the Rights of the Child; CSOs & NGOs; Trade/ Labour Unions	i) Number of District Vigilance Committees established and functional; (ii) Number of capacity-building activities	1, 3, 8	Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
59	Amend the Workmen's Compensation Act 1923 with an updated list of scheduled diseases, including COVID-19, against which compensation can be claimed.	Ministry of Law and Justice; Ministry of Human Rights		(i) Amendment with updated list	1, 3	Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
60	Update the Pakistan Penal Code to provide a comprehensive list of occupational hazards and the ambit of protection therein.	Ministry of Law and Justice; Provincial Assemblies	National Commission on Human Rights; Provincial Labour Home Departments; Provincial Health Department; Labour/Trade Unions; Business Community; CSOs, INGOs & NGOs; Ministry of Law and Justice, Ministry of Commerce; Ministry of Industries and Production; Ministry of National Health Services Regulation and Coordination; Ministry of Parliamentary Affairs; Provincial Human Rights Departments; National Assembly; Senate	(i) Amendment with updated list	1, 3	Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions
61	Ratify ILO Convention No. 155 (Occupational Safety and Health) and ILO Convention No. 187 (Promotional Framework for Occupational Safety and Health).	Federal Cabinet of Pakistan; Ministry of Law and Justice; Ministry of Human Rights	Ministry of Foreign Affairs; Ministry of Parliamentary Affairs	(i) Steps taken required prior to ratification; (ii) Ratification of Conventions	1, 3	Goal 3 – Good Health and Well-being; Goal 8 – Decent Work and Economic Growth; Goal 16 – Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
62	Bring up-to-date health and safety legislation, standards, rules and guidelines, and independent enforcement mechanism for all sectors, with immediate priority allotted to the most hazardous sectors based on available data or reported concerns, and account for the differentiated needs of workers, including women, elderly workers, and others.	Ministry of Industries and Production; Provincial Labour and Manpower Departments	Ministry of National Health Services, Regulations and Coordination; Provincial Health Departments; Provincial Mines & Mineral Departments; Chief Minister's Inspection Teams; Ministry of Human Rights; Provincial Human Rights Departments; Ministry of Planning, Development and Reform; Provincial Planning and Development Departments; NGOs & CSOs; Trade/Labour Unions; Business Community	(i) Number of new or updated laws, standards, rules, guidelines, and independent enforcement mechanisms	1, 3	Goal 3 – Good Health and Well-being; Goal 5 – Gender Equality; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
63	Conduct a national mapping exercise to identify existing reporting procedures for human rights violations occurring from business activity, and make recommendations for improved effectiveness.	Ministry of Human Rights; Provincial Human Rights Departments; National Commission on Human Rights	NHRIs and CSOs at Federal & Provincial Levels	i) Mapping exercise report	1, 25	Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities; Goal 16 – Peace, Justice and Strong Institutions
64	Conduct a national study on barriers to entry and advancement of women in the justice sector.	Ministry of Human Rights; Provincial Human Rights Departments; National Commission on the Status of Women	Provincial Industries and Commerce Departments; Federal & Provincial Ombudspersons for Sexual Harassment	(i) National study report	1, 25	); Goal 5 – Gender Equality; Goal 16 – Peace, Justice and Strong Institutions



	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
65	Establish Labour Courts in all districts, and review the existing framework of Labour Courts, including assessment of gender-responsiveness, and utilise the findings to increase and strengthen functioning of Courts to provide for the efficient handling of industrial disputes and the effective protection of labour rights.	Federal and Provincial Governments; Ministry of Law and Justice; Provincial Law Departments; Provincial Labour Departments; Legal experts	High Courts; Supreme Court of Pakistan, Law and Justice Commission of Pakistan; Ministry of Parliamentary Affairs; Provincial Parliamentary Affairs Departments; Trade/Labour Unions	(i) Number of newly established Labour Courts; (ii) Review reports; (iii) Budgetary allocations	1, 3, 25, 26	Goal 8 - Decent Work and Economic Growth; Goal 16 - Peace, Justice and Strong Institutions
66	Establish Child Protection Courts in all districts, and review the framework of existing Child Protection Courts to include the authority to direct the training and rehabilitation of victims of child labour.	Ministry of Human Rights; Ministry of Law and Justice; Provincial Home Departments; Provincial Law Departments; Legal experts	High Courts; Supreme Court of Pakistan; Law and Justice Commission of Pakistan; Provincial Human Rights Departments; Federal Public Service Commission; Provincial Service Commissions; Federal Judicial Academy; Provincial Judicial Academies	i) Number of newly established Child Protection Courts; (ii) Review reports; (iii) Budgetary allocations	1, 3, 25, 26	Goal 8 - Decent Work and Economic Growth; Goal 16 - Peace, Justice and Strong Institutions
67	Establish and strengthen existing guidelines and compile best practices for the Judiciary to ensure effective remediation of human rights abuses occurring through business activity.	Ministry of Human Rights; Provincial Human Rights Departments; Ministry of Law and Justice; Provincial Law Departments	Federal and Provincial Judicial Academies; Provincial Human Rights Departments; Federal Public Service Commission; Provincial Service Commissions; legal experts	(i) Development of guidelines and best practices; and (ii) Dissemination of Guidelines	1, 3, 25, 26	Goal 16 - Peace, Justice and Strong Institutions

	Proposed Action	Leading Entity	Additional Entities	Performance Indicators	UNGPs	SDGs
68	Ensure the effective functioning of public grievance redressal mechanisms such as the Ombudsman Offices and enhance their capacity to resolve complaints.	Federal and Provincial Ombudsman against Harassment of Women at the Workplace; Ministry of Human Rights	Provincial Human Rights Departments; National Commission of Human Rights; Services and General Administration Department; Legal experts	(i) Development of Capacity-building Initiatives; and (ii) Number of Capacity-building Trainings	1, 3, 27	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities
69	Conduct compliance review to verify that effective and gender responsive organizational remedial mechanisms, including Inquiry Committees, are established in all public and private enterprises.	Industries and Commerce Departments; Fact finding Committees	Relevant Industries and Businesses	(i) Compliance review report	1, 2, 3, 12, 15, 22, 23, 25, 28, 29	Goal 5 – Gender Equality; Goal 8 – Decent Work and Economic Growth; Goal 10 – Reduced Inequalities

## Annex II | Actions Already Undertaken by Pakistan

This Annex details some important actions already undertaken by the State of Pakistan, which form a robust foundation for the implementation of the National Action Plan on Business and Human Rights.

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### A | General Measures Relevant to Business and Human Rights

- The Ministry of Planning & Development is mandated to ensure achievement of the SDGs.
- Inclusion of marginalised communities and women in the formal economy through enactment of laws facilitating the employment of transgender persons and women in different sectors. The Action Plan on Human Rights also prioritizes gender issues.
- The Securities and Exchange Commission of Pakistan (SECP) has provided guidelines on CSR, whereby public companies must report on how their activities protect and promote human rights.
- Section 204 (2) of the Companies Act 2017 states that directors of a company are to act in good faith in promoting the objects of a company and must ensure that their actions are in the best interest of the company, its employees, shareholders, the community, and the environment.
- There are several laws that relate to the protection of labour rights in line with international obligations and the ILO Conventions. Notably, the Industrial Relations Act 2012 calls for the creation of a National Industrial Relations Commission, which is mandated to deal with cases of unfair labour practices.
- The Public Sector Companies (Corporate Governance) Rules 2013 have been promulgated, which require that a Code of Conduct be created which articulates acceptable and unacceptable behaviour, and ensures that adequate systems are in place for the identification and redressal of grievances from unethical practices.

- Protection from environmental degradation is also a priority for Pakistan. Under the State Bank Guidelines for Infrastructure Project Financing, companies must draft a description of environmental impact assessments and must report on health and safety issues to provide information as to the compliance of the project with relevant laws.
- The Pakistan Environmental Protection Act 1997 also provides for environmental impact assessments and initial environmental examinations to ensure the protection of the environment in carrying out business activity.

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## B | Measures Relevant to NAP Priority Areas

### i. Financial Transparency, Corruption and Human Rights Standards in Public Procurement Contracts

- Corruption in the public sector has been criminalised under various legislative instruments such as the Pakistan Penal Code 1860 and the Prevention of Corruption Act 1947.
- The Local Government Acts and Ordinances, which apply at both Federal and Provincial levels, also provide guidance to public officials to ensure that their actions do not constitute corruption or misuse of authority.
- The Eradication of Corrupt Business Practices Ordinance 1998 has also been promulgated to enforce anti-corruption laws against companies. This law criminalises any act of corruption carried out during business activity.
- The National Accountability Bureau (NAB) has been established to ensure the enforcement of laws and to investigate and prosecute crimes of corruption. In recent years, the independence of NAB has been strengthened to ensure that all cases of corruption and financial misrepresentation are thoroughly investigated. In this regard, the Federal Investigation Agency, and the Federal Board of Revenue supplement the work of the NAB to ensure that criminal actions involving corruption are adequately addressed.
- The Provincial Anti-Corruption Establishments have also been set up to investigate offences of corruption by public servants.
- The Public Procurement Regulatory Authority has also been established at a Federal and Provincial level to assess procedures and take measures to improve governance, management, transparency, and accountability of all work related to public procurement. Should any changes require specific laws or rules, the Authority can recommend new laws and policies to the State to be enacted.

- Pursuant to Pakistan's grey-listing by FATF, several laws and guidelines relating to AML/CTF have been passed. The Financial Monitoring Unit has been set up to investigate cases of suspicious transactions. The regulations and policies promulgated by the State in this regard aim to enhance financial transparency of different business entities.

## ii. Anti-Discrimination, Equal Opportunity, and Inclusion

### Gender Based Discrimination

- The Protection against Harassment of Women at the Workplace Act 2010 was passed to ensure the safety of women at the workplace. The Act requires each organization to ensure the creation of an inquiry committee to investigate and decide upon cases of harassment at the workplace. The power to investigate and decide upon cases of harassment also rests with the Federal and Provincial Ombudspersons for Harassment.
- The Action Plan on Human Rights also sets out protection and empowerment of women as a priority area for intervention. Proposed actions include national policy guidelines on Gender Based Violence; review of all discriminatory legislation against women, establishment of new crisis centres for women and strengthening of existing centres at the district level.
- Pakistan Decent Work Country Program I and II (2010-2015, 2016-2020) are aimed at reducing discrimination faced by women at the workplace, with the objective of improving gender equality and facilitating access to equal work opportunities. It also requires business enterprises to comply with the principle of non-discrimination
- The Transgender Persons (Protection of Rights) Act 2018 has been promulgated prohibiting discrimination against transgender persons. It explicitly prohibits unfair treatment in relation to employment, trade or occupation and the denial of or termination from employment or occupation based on gender. In this regard, a new welfare project for transgender persons has also been planned comprising skill-building and access to credit.
- The Ministry of Human Rights has launched a helpline aimed at offering legal advice and support regarding women's right to inheritance. The Ministry has also launched an awareness campaign on 'Rights of the Girl Child'.
- The National Commission on the Status of Women was created to promote and protect the economic, social, political, and legal rights of women.

- Domestic legislation has been promulgated within Khyber Pakhtunkhwa, Sindh and Punjab which ensure maternity benefits for women in employment.
- Benazir Income Support Programme was inaugurated to provide social assistance to women by giving interest free financial assistance to female beneficiaries under their Waseela-e-Haq (Micro-Finance) programme to start their own businesses. Additionally, the Waseela-e-Sehat programme subsidizes health care for beneficiaries and provides life insurance to close to one million women while the Waseela-e-Rozgar programme provides vocations and technical trainings. Similarly the Ehsaas Program includes components related to financial assistance, micro-credit, interest free loans, and similar initiatives for women and vulnerable or marginalised groups.
- The Election Act 2017 was passed to improve women's participation in elections by requiring political parties to field women candidates on at least 5% of the general seats for the National and Provincial Assemblies. The Election Commission of Pakistan is empowered to nullify results in constituencies where women's turnout is equal to or less than 10% and to take necessary actions against any agreements that ban women from voting.

### Punjab

- The Punjab Fair Representation of Women Act 2014 creates an obligation on public sector bodies to ensure a 33% quota for women in decision-making positions.
- The Punjab Maternity Benefit Ordinance states that women cannot be discriminated against based on being expectant mothers. It establishes that employers must pay maternity benefits in such cases prior to and after the birth of the child.
- The Punjab Commission on the Status of Women was established by the Punjab Commission on the Status of Women Act, 2014 and enjoys a broad mandate, which includes the monitoring, implementation, and protection of laws to advance gender equality and to eliminate discriminatory practices against women. The Commission makes policy suggestions and undertakes research and is mandated to take up inquiries, and deal with relevant complaints. The Commission has also introduced a project on generating data "to advance Women's Social and Economic well-being in Punjab" which aims to encourage female participation in the economic sphere, free from discrimination.

### Sindh

- The Sindh Maternity Benefit Act 2018 prohibits discrimination against women based on being expectant mothers. It establishes that employers must pay maternity benefits to women employees prior to and after the birth of their child.
- The Sindh Protection against Harassment of Women at the Workplace Act 2010 ensures that women are provided adequate protection against harassment at places of work. Every organization is under an obligation to create an inquiry committee to investigate and decide open cases of harassment at the workplace in accordance with the provisions of the Act. A Provincial ombudsperson has been authorized under the Act to investigate and decide upon cases of harassment.
- The Sindh Women Agriculture Workers Act 2019 was promulgated to protect the social security rights of female labourers in Sindh.
- The Sindh Commission on the Status of Women was established pursuant to the Sindh Commission on the Status of Women Act, 2015. However, the Commission was set up in 2017 after a two-year delay in drafting the Rules of the Commission. It is mandated to promote and respect compliance with social, economic, political, and legal rights of women to ensure the eradication of discriminatory practices against women.

### Khyber Pakhtunkhwa

- The Khyber Pakhtunkhwa Maternity Benefits Act 2013 creates an obligation on all employers operating in the Province to not knowingly employ new mothers at least till after 6 weeks of childbirth. Additionally, Section 7 states that employers cannot dismiss a woman without sufficient cause, only based on her pregnancy, and Section 5 makes provisions for maternity benefits to be paid for a period of 12 weeks. Such laws allow the protection of women, especially expectant mothers from discriminatory practices and regulate business activity to ensure that adverse impacts on the rights of women are curtailed.
- The Khyber Pakhtunkhwa Protection against Harassment of Women at Workplace Act 2018 ensures that women are provided adequate protection against harassment at places of work. Every organization is under an obligation to create an inquiry committee to investigate and decide open cases of harassment at the workplace. A Provincial ombudsperson has been authorized under the Act to investigate and decide upon cases of harassment.

- The Khyber Pakhtunkhwa Commission on the Status of Women was established under the Khyber Pakhtunkhwa Commission on the Status of Women Act 2016 and is mandated to oversee implementation of laws and policies to ensure the protection of women's rights and to encourage participation in economic activity without any distinction.

### Balochistan

- The Balochistan Protection Against Harassment of Women at Workplace Act 2016 provides adequate protection to women against harassment at places of work. Every organization is under an obligation to create an inquiry committee to investigate and decide open cases of harassment at workplace in accordance with the provisions of the Act. A Provincial ombudsperson has been authorized under the Act to investigate and decide upon cases of harassment.
- The West Pakistan Maternity Benefit Ordinance 1958 applies in Balochistan which states that women cannot be discriminated against based on being expectant mothers. It establishes that employers must pay maternity benefits in such cases prior to and after the birth of the child.
- The Women Development Department, Balochistan was created in 2009 and its primary aim is the elimination of socio-economic discrimination against women. It is responsible for the implementation of the National Action Plan for Women and the implementation of CEDAW for Balochistan, which includes the creation of policies and regulatory practices that target business enterprises to curb discrimination against women at the workplace.
- The Gender Equality and Women Empowerment Policy was launched in 2013 and the Action Plan there under has authorized the Women Development Department to implement the same.



### **a. Inclusion of Vulnerable Groups and Marginalised Communities in Workplace**

#### **ICT**

- The ICT Rights of Persons with Disability Act was enacted in 2020.

#### **Punjab**

- The Disabled Persons (Employment and Rehabilitation) Ordinance 1981 applies in Punjab and provides support to Persons with Disabilities to find employment and be treated equally at places of work.
- The Punjab Minimum Wages Act 2019 prohibits employers from paying less than the minimum wage to any employee, thus the payment of lower wages on a discriminatory basis towards vulnerable and marginalised communities, for example, religious minorities, is not permitted.
- The Punjab Labor Policy 2018 contains a separate chapter focusing on vulnerable groups of workers.
- The Punjab Commission on the Status of Women was established to empower women and promote gender equality.
- The Human Rights and Minorities Affairs Department was established in 2008 to uplift minority rights and promote human rights in Punjab. The Department deals with human rights abuses and has established a Minority Advisory Council and a Provincial Task Force on human rights to promote economic, social, and religious welfare of minorities to ensure that discriminatory practices are curbed by way of suggestions for legislative change.
- The Provincial Council for Rehabilitation of Disabled Persons has the mandate to safeguard the rights of Persons with Disabilities. This includes the creation of policies which encourage anti-discriminatory laws in all spheres, including non-discrimination in employment.

#### **Sindh**

- Section 8 of the Sindh Differently Abled Persons (Employment, Rehabilitation and Welfare) Act 2014 stipulates that not less than 2% of the total number of persons employed must be Persons with Disabilities.
- The Sindh Minimum Wages Act 2015 prohibits employers from paying less than the minimum wage to any employee, thus the payment of lower wages on a discriminatory basis towards

vulnerable and marginalised communities, for example, religious minorities, is not permitted.

- The Sindh Labor Policy 2018 contains a separate chapter that covers the following:
  - i. Mine Workers
  - ii. Women
  - iii. Child Labour
  - iv. Bonded Labour
  - v. Special Persons
- The Sindh Minorities' Affairs Department was established in 1995 and acts as a standalone department. It is mandated to ensure the protection of rights of minorities' by facilitating the formulation of relevant policies, and by reviewing the existing framework which regulates the protection of minority rights in Pakistan.
- The Sindh Women Agricultural Workers Act was enacted in 2019.

### Khyber Pakhtunkhwa

- The Khyber Pakhtunkhwa Disabled Persons (Employment and Rehabilitation) Amendment Act, 2012 focuses on the regulation and introduction of laws and practices that curb anti-discrimination against Persons with Disabilities in employment and emphasizes the need to ensure equal opportunities for such individuals as well.
- The Khyber Pakhtunkhwa Minimum Wages Act 2013 prohibits discrimination based on religion in the payment of wages.
- The Khyber Pakhtunkhwa Labour Policy 2018 affirmed that Persons with Disabilities will be mainstreamed in all economic sectors, barriers for their participation in economic activities will be removed, their accessibility will be increased at all educational, vocational and workplace institutions and their achievements will be highlighted at all levels. The quota of Persons with Disabilities and facilitation in employment as protected under Disabled Persons (Employment & Rehabilitation) Ordinance, 1981 will strictly be observed in all the industrial and commercial establishments of the Province.
- The policy also highlighted the difficulties faced by transgender persons in Khyber Pakhtunkhwa and committed to taking steps through the integration of policies and programs for the promotion of transgender persons in skill development and job placement in industrial and commercial establishments. It was affirmed through this policy that transgender persons will be mainstreamed in all economic sectors, barriers for their participation in economic activities will be removed and their accessibility will be increased to all educational, vocational and workplace institutions.

- The Khyber Pakhtunkhwa Directorate of Human Rights was established in 2014 by way of the Promotion, Protection and Enforcement of Human Rights Act. The Directorate deals with monitoring human rights in the Province of Khyber Pakhtunkhwa and reviews existing law and its compliance with international instruments which Pakistan has ratified which includes a review of discriminatory practices to ensure that economic, social, political, and legal rights are available to all without any distinction.

### Balochistan

- The Balochistan Assembly has introduced the Persons with Disabilities Act 2017 which requires the Government to ensure that Persons with Disabilities are given equal opportunities to pursue their economic, social, and cultural rights. To eliminate discrimination against Persons with Disabilities, the Act mandates a 5 percent quota for employment which applies to corporate entities as well.
- The Social Welfare Department Balochistan was established in 1962 and aims to provide a better social environment in Balochistan. It assists in the formulation and publication of programs for the protection of human rights in the Province and aims to eliminate all forms of discrimination and inequality by harmonizing existing laws with international human rights instruments.

### iii. Human Rights Due Diligence

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While there is presently no legislative framework on human rights due diligence in business activity, there are certain guidelines and mechanisms in place covered under the wide spectrum of due diligence. Some of these are listed below:

- The State Bank has developed guidelines which provide that as a pre-requisite companies must draft a description of environmental impact assessments and must report on health and safety issues to provide information as to the compliance of the project with relevant laws.
- In the sustainability reports of businesses within Pakistan, corporate social responsibility (CSR) is a major component. This mostly covers health, safety, and environmental policies.
- A few multinational companies operating in Pakistan like Jazz, Telenor, and Coca Cola do have due diligence policies in place to address human rights risks through impact assessments.
- Many companies especially State Owned, and Controlled Entities have taken initiatives of their own as part of their Corporate Social Responsibility programs including education, health, women empowerment, community building, and the environment.

#### iv. Labour Standards and the Informal Economy

##### ICT

- The Islamabad Capital Territory Domestic Workers Bill 2020 was passed by the National Assembly in May, 2021.

##### Punjab

- The Punjab Government passed the Industrial Relations Act in 2010, which allows citizens to exercise their right of association by joining trade unions to bargain collectively through their representatives.
- Through the Punjab Minimum Wages Act 2019, the Provincial Government regulates minimum rates of wages for unskilled and different categories of skilled workers employed in industrial and commercial establishments. Moreover, the Provincial Government can also review minimum wage rates if there is any change in the economic conditions or cost of living in the country.
- The Minimum Wages for Unskilled Workers Ordinance 1969 is still operational in Punjab and it aims to fix the minimum rates of wages for unskilled workers employed in certain commercial and industrial establishments.
- The Punjab Provincial Employees Social Security (Amendment) Act 2013 increases the wage limit of workers and entitles the nearest kin of a secured employee to a death grant.
- The Factories Act 1934 applies in Punjab and it limits the duration of working hours of labourers to 9 hours a day. It also gives workers the right to take a holiday for 14 consecutive days in a year. Section 49 of the Act also permits festival holidays for up to 13 days.
- The Punjab Shops and Establishments Ordinance allows workers to work for no more than 9 hours a day and 48 hours a week.
- The Punjab Domestic Workers Act 2019 passed by the Punjab Assembly is the first law in Pakistan that regulates domestic workers. Through this legislation, the Punjab Government protects the rights of domestic workers, regulates their terms of employment and working conditions of service, provides them social protection and ensures their welfare. It prescribes a minimum wage for domestic workers, a maximum 8-hour work day as well as a weekly holiday, and the provision of dignified lodging and working conditions.

- The Employees' Old Age Benefits Act 1976 contains provisions that allow workers to claim pension once they are of a certain age, after being employed for a period of time.
- The Provincial Employees Social Security Ordinance 1965 requires an employer to provide health care, including maternity care, to full-time domestic workers under Section 55A.
- The Minimum Wages Ordinance of 1961 includes domestic workers in its definition of workers.
- The Apprenticeship Act 2017 includes the informal sector in its definition of 'establishment'. It thereby regulates apprenticeships within the informal sector.

### Sindh

- The Sindh Industrial Relations Act 2013 allows workers and employees to join trade unions so that they can bargain collectively through their chosen representatives.
- The Sindh Payment of Wages Act 2015 aims to regulate the payment of wages of certain classes of persons employed in factories, industrial and commercial establishments.
- The Factories Act 1934 applies in Sindh and it limits the duration of working hours of labourers to 9 hours per day. It also gives workers the right to take a holiday for 14 consecutive days in a year. Section 49 of the Act also permits festival holidays.
- The Sindh Shops and Commercial Establishment Act 2015 limits the duration of working hours to 9 hours a days and 48 hours a week.
- The Sindh Home Based Workers Act 2018 was enacted to regulate persons who work in the informal or unorganized sector carrying out remunerative work within their homes or outside the formal sector.
- The Sindh Employees Old-Age Benefits Act 2014 extends its benefits to any establishment that employs five or more people, so it is applicable to the informal sector.
- Section 59 of the Sindh Employees' Social Security Act 2016 states that employers are to provide health care and maternity care to full-time domestic workers.
- The Apprenticeship Act 2017 includes the informal sector in its definition of 'establishment'. It thereby regulates apprenticeships within the informal sector.

### Khyber Pakhtunkhwa

- The Khyber Pakhtunkhwa Industrial Relations Act 2013 allows workers and employees to join trade unions so that they can bargain collectively through their chosen representatives.
- Section 36 of the Khyber Pakhtunkhwa Shops and Establishments Act 2015 prescribes that every industrial and commercial establishment employing five or more women workers provide separate washrooms and a facility where women workers can bring and nurse their pre-school and infirm children.
- The Khyber Pakhtunkhwa Minimum Wages Act 2013 provides for the regulation of minimum rates of wages and various allowances for different categories of workers employed in certain industrial and commercial undertakings.
- The Factories Act 1934 applies in Khyber Pakhtunkhwa and it limits the duration of working hours of labourers to 9 hours per day. It also gives workers the right to take a holiday for 14 consecutive days in a year. Section 49 of the Act also permits festival holidays.
- Working hours for employees in Khyber Pakhtunkhwa are limited to 8 hours a day and 48 hours a week under the Khyber Pakhtunkhwa Shops and Establishments Act 2015.
- The Minimum Wages Ordinance 1961 is applicable to all industrial establishments' employees whether skilled, unskilled or apprentices and even domestic workers.
- The Khyber Pakhtunkhwa Labour Policy 2018 stated that there is a need for legislation catering to the informal sector and its workers.

### Balochistan

- The Balochistan Industrial Relations Act 2013 allows workers and employees to join trade unions so that they can bargain collectively through their chosen representatives.
- The Factories Act 1934 applies in Balochistan and it limits the duration of working hours of labourers to 9 hours per day. It also gives workers the right to take a holiday for 14 consecutive days in a year. Section 49 of the Act also permits festival holidays.
- The Minimum Wages Ordinance of 1961 includes domestic workers in its definition of workers.

- The Provincial Employees Social Security Ordinance 1965 requires employers to provide health care, including maternity care to full-time domestic workers under Section 55A.
- The Employees' Old Age Benefits Act 1976 contains provisions that allow workers to claim pension once they are of a certain age, after being employed for a period of time.
- The Apprenticeship Act 2017 includes the informal sector in its definition of 'establishment'.

## v. Child Labour

### ICT

- Domestic child labour was proscribed through an amendment in 2021 on Employment of Children Act 1991.

### Punjab

- In 2016, the Punjab Government passed the Punjab Restriction on Employment of Children Act, which prohibits employing children in hazardous occupations. It also imposes a fine of up to fifty thousand rupees and jail time of at least 7 days, which can be extended up to 6 months if the provisions of the Act are disregarded. The Act also contains punishments for those caught subjecting children to slavery, prostitution, or have them involved in illicit activities such as drug trafficking i.e. jail time of up to 7 years and no less than 3 years and a fine of no less than three thousand rupees and no more than one million rupees.
- The Punjab Prohibition of Child Labour at Brick Kilns Act prohibits the employment of anyone younger than 15 years old at brick kilns.
- Elimination of child labour and bonded labour project has been initiated in Punjab to provide education to vulnerable children, rehabilitate bonded laborers working in brick kilns, promote integration and coordination of Government responses, strengthen legislation, increase the capacity of law enforcement and service providers, and increase the knowledge base on these issues. As of May 2017, the program provided cash assistance to families of 88,000 child laborers to support children to attend school rather than working in brick kilns. The project ended in July 2018.

### Sindh

- The Sindh Prohibition of Employment of Children Act 2017 prohibits the employment of children and regulates the employment of adolescents in certain occupations of work.

## vi. Forced or Bonded Labour

### Khyber Pakhtunkhwa

- The Khyber Pakhtunkhwa Prohibition of Employment of Children Act 2015 is a specialized law which defines a child as anyone under the age of 15 years old, and states that a child above the age of 12 years old can engage in light work for a maximum of 2 hours per day alongside a family member to acquire skills. Moreover, it stipulates that no adolescents (between 15 – 18 years old) can be engaged in hazardous work.

### Balochistan

- In 2016, the Balochistan Assembly passed the Balochistan Child Protection Act, which provides protection to children from all forms of mental or physical violence, injury, neglect or negligent treatment, maltreatment, or exploitation, including sexual abuse.

### Punjab

- The Punjab Bonded Labour System (Abolition) Act 2012 prohibits bonded labour and requires the Provincial Government to set up vigilance committees at the district level comprised of elected representatives, district administration and civil society. Moreover, the fines applicable under the Act have been increased.

### Sindh

- The Sindh Government passed the Sindh Bonded Labour System (Abolition) Act, 2015 which provides for the abolition of bonded labour system with a view to prevent economic and physical exploitation.

### Khyber Pakhtunkhwa

- The Khyber Pakhtunkhwa Bonded Labour System (Abolition) Act 2015 outlawed the usage of bonded labour in the Province and increased the fines in case the provisions of this Act are disregarded.

### Balochistan

- The Balochistan Government relies on the Bonded Labour (Abolition) Act 1992, which prohibits the usage of bonded labour and 'paishgi' forms of employment and empowers Provincial Governments to ensure compliance. Section 15 of the Act also requires Provincial Governments to set up vigilance committees at the district level, comprised of elected representatives, district administration and the civil society.



## vii. Occupational Health and Safety

- There are a number of laws that have been enacted over the years that relate to different aspects of occupational health and safety. These laws provide for cleanliness, disposal of waste, ventilation and temperature, provision of breaks from work, fixed working hours, water and sanitation facilities, compulsory vaccination, lighting, dust and fume, precautions in cases of accidents, emergency management as well as periodic inspection of workplaces. However, most legislation relating to occupational health and safety is dated and needs to be amended in line with international and domestic advancements within the workplace.
- Punjab introduced its Occupational Safety and Health Act in 2019, providing guidelines to employers for the protection and safety of workers' mental and physical health at the workplace. The law also provides for training and awareness programmes on matters relating to health and safety, preventive measures and the requirement of employers to report any accident at the workplace.
- Sindh devised a Joint Action Plan for Promoting Workplace Safety and Health (2013-2016) to define parameters of safe and healthy workplaces.

## viii. Access to Remedy

- In addition to judicial mechanisms, quasi-judicial bodies exist to regulate competition in business, unfair labour practices and industrial disputes. These bodies include the Ombudsperson offices in all four provinces for sexual harassment at the workplace, taxation, insurance and to address any complaints faced by the public from Federal Government Departments which include State Owned Entities. Punjab introduced its Occupational Safety and Health Act in 2019, providing guidelines to employers for the protection and safety of workers' mental and physical health at the workplace. The law also provides for training and awareness programmes on matters relating to health and safety, preventive measures and the requirement of employers to report any accident at the workplace.
- The National Industrial Relations Commission (NIRC) has been established with the jurisdiction to resolve industrial disputes and those which relate to unfair labour practices.
- The National Commission of Human Rights has been established as an independent State body with the mandate to protect and promote human rights and has also been granted quasi-judicial competence to investigate violations of human rights abuses either through individual complaints or a suo-motu capacity.

- The Legal Aid and Justice Authority Act was enacted in 2020.
- In Khyber Pakhtunkhwa, the Khyber Pakhtunkhwa Legal Aid Act was enacted in 2019.

## Annex III | Road to Pakistan's National Action Plan on Business and Human Rights

### 2018

- **October** - Federal Ministry of Human Rights (MoHR) and UNDP have initial discussions on the advancement of Business and Human Rights (BHR) in Pakistan through the development of a National Actional Plan (NAP).
- **November** - MoHR attends the United Nations Forum on Business and Human Rights in Geneva.
- **December** - MoHR and UNDP engage an independent legal research team, Research Society of International Law (RSIL), for the development of a National Baseline Assessment (NBA) to analyse Pakistan's current legal and regulatory framework in the context of BHR.

### 2019

- **March** - Joint Secretary MoHR attends BHR Symposium at LUMS, organised by RSIL.
- **April** - Government delegation visits Bangkok to learn from the Government of Thailand's experience of developing a NAP. MoHR, Ministry of Industries and Production and the NCHR represent the Government of Pakistan.
- **September** - MoHR and RSIL attend a regional consultation in Davao, Philippines on delivering peace, justice and reconciliation and the role of business therein.
- **November**
  - BHR launch event in Islamabad
  - MoHR presents Pakistan's progress towards development of NAP at BHR Forum in Geneva focusing on the transparency of the process (BHR website, multi-stakeholder consultations, etc.)
- **December** - NBA is completed.

## 2020

- **February** - Zero draft of NAP is completed. Revisions and update commences to take into account provincial priority areas.
- **June** - MoHR participates in the United Nations Virtual Forum on Responsible Business and Human Rights.
- **October** - MoHR participates in RSIL's BHR Symposium.

## 2021

- **March**
  - o First Draft National Action Plan completed.
  - o Draft NAP is uploaded online ([www.bhr.com.pk/nap](http://www.bhr.com.pk/nap)) with an open call for public feedback and recommendations.
  - o Draft NAP is disseminated for review and comments to various federal ministries, provincial government departments, and various other stakeholders (listed below in Table 2).
  - o MoHR participates in South Asian Forum on Business and Human Rights, including Keynote Speech by Minister for Human Rights and Presentation on Draft NAP by Federal Secretary.
- **May**

Draft NAP is updated based on feedback and recommendations received.
- **June**

Permanent Mission of Pakistan to the United Nations, Geneva, submits National Statement for the Human Rights Council Panel Discussion on the tenth anniversary of the United Nations Guiding Principles on Business and Human Rights (UNGPs), highlighting Pakistan's commitment to the UNGPs through the development of the NAP.
- **July**

Draft NAP updated based on the last round of comments received from federal ministries, provincial government departments, and various other stakeholders.
- **September**

Senior Management of Ministry of Human Rights reviews the Final Draft of NAP before presenting it to the Federal Cabinet.

**Table 1 | List of meetings and consultations**

<b>Date/s</b>	<b>Meeting / Consultation</b>
<b>2019</b>	
October	Consultation workshop with various stakeholders in Lahore
November	Meetings with government stakeholders in Islamabad
December	Meetings with various stakeholders in Sialkot
	Meetings with various stakeholders in Faisalabad
<b>2020</b>	
January	Meetings with various stakeholders in Peshawar
	Meeting with Board of Investment (BOI) in Islamabad
March	Meeting with various stakeholders in Lahore
June	Meetings with various stakeholders in Gilgit-Baltistan
July	Meetings with various stakeholders in Lahore
	Meetings with various stakeholders in Quetta
August	Meetings with various stakeholders in Gilgit-Baltistan
September	Consultation workshop with various stakeholders in Quetta
October	Consultation workshop with various stakeholders in Karachi
	Consultation workshop with various stakeholders in Peshawar

**Table 2 | List of Ministries/Departments and NHRIs draft NAP was submitted to for comments**

No.	Entity
1	Ministry of Industries & Production, Federal Government
2	Ministry of Planning & Development, Federal Government
3	Ministry of Federal Education & Professional Trainings, Federal Government
4	Ministry of Finance, Revenue & Economic Affairs, Federal Government
5	Ministry of Commerce, Federal Government
6	Ministry of Information Technology, Federal Government
7	Ministry of Climate Change, Federal Government
8	Ministry of Inter-Provincial Coordination, Federal Government
9	Ministry of Information, Broadcasting, National History, Federal Government
10	Board of Investment (BOI), Islamabad, Federal Government
11	The Federal Ombudsman, Secretariat for Protection Against Harassment, Federal Government
12	Women Development Department, Government of the Punjab
13	Punjab Commission on the Status of Women
14	Planning & Development Department, Government of the Punjab
15	Law & Parliamentary Affairs Department, Government of the Punjab
16	Social Welfare Department, Government of the Punjab
17	Punjab Workers Welfare Board, Government of the Punjab
18	Local Government & Community Development Department, Government of the Punjab
19	Child Protection Bureau, Government of the Punjab
20	Human Rights and Minorities Affairs Department, Government of the Punjab
21	Labour & Human Resource Department, Government of the Punjab
22	Higher Education Department (HEC), Government of the Punjab
23	Labour & Human Resource Department, Government of Sindh
24	Women Development Department, Government of Sindh
25	Human Rights Department, Government of Sindh
26	Sindh Commission on the Status of Women
27	Industries & Commerce Department, Government of Sindh
28	Information Science and Technology Department, Government of Sindh
29	Law & Parliamentary Affairs Department, Government of Sindh
30	Planning & Development Department, Government of Sindh
31	Social Welfare Department, Government of Sindh

32	Department of Empowerment of Persons with Disabilities, Government of Sindh
33	Local Government, Rural Development and HTP Department, Government of Sindh
34	Planning & Development / Planning & Rural Development Department, Government of Balochistan
35	Social Welfare Department, Government of Balochistan
36	Special Education, Literacy, Non-Formal Education and Human Rights Department, Government of Balochistan
37	Balochistan Commission on the Status of Women, Government of Balochistan
38	Women Development Department, Government of Balochistan
39	Labour & Manpower Department, Government of Balochistan
40	Social Welfare & Small Industries Department, Government of Balochistan
41	Balochistan Technical Education and Vocational Training Authority (BTEVTA), Government of Balochistan
42	Education Department, Government of Balochistan
43	Industries & Commerce Department, Government of Balochistan
44	Information Department, Government of Balochistan
45	Finance Department, Government of Balochistan
46	Law & Parliamentary Affairs Department, Government of Balochistan
47	Local Government & Rural Development Department, Government of Balochistan
48	Mines & Minerals Department, Government of Balochistan
49	Science, Technology & Information Technology Department, Government of Balochistan
50	Social Welfare & Women Development Department, Government of Khyber Pakhtunkhwa
51	Law, Parliamentary Affairs & Human Rights Department, Government of Khyber Pakhtunkhwa
52	Khyber Pakhtunkhwa Commission on the Status of Women
53	Planning & Development Department, Government of Khyber Pakhtunkhwa
54	Industries & Commerce Department, Government of Khyber Pakhtunkhwa
55	Finance Department, Government of Khyber Pakhtunkhwa
56	Labour Department, Government of Khyber Pakhtunkhwa
57	Information & Public Relations Department, Government of Khyber Pakhtunkhwa

58	Technical Education Department, Government of Khyber Pakhtunkhwa
59	Mines & Minerals Department, Government of Khyber Pakhtunkhwa
60	Finance Department, Government of Gilgit Baltistan
61	Planning & Development Department, Government of Gilgit Baltistan
62	Social Welfare & Human Rights Department, Government of Gilgit Baltistan
63	Industries, Mines & Minerals, Labour and Commerce Department, Government of Gilgit Baltistan
64	Small & Medium Enterprises Development Authority (SMEDA), Government of Gilgit Baltistan
65	GB Chamber of Commerce & Industry, Government of Gilgit Baltistan
66	National Commission on the Status of Women (NCSW), National Human Rights Institution
67	National Commission on Human Rights (NCHR), National Human Rights Institution
68	National Commission for Rights of Child (NCRC), National Human Rights Institution



MINISTRY OF HUMAN RIGHTS  
GOVERNMENT OF PAKISTAN

**Ministry of Human Rights, Government of Pakistan**  
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