



2024

United States Government
National Action Plan
on Responsible
Business Conduct



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Introduction

On December 16, 2016, five years after the United Nations (UN) Human Rights Council’s unanimous endorsement of the UN Guiding Principles for Business and Human Rights (UNGPs) and the addition of human rights to the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct (“OECD Guidelines”), the U.S. government (USG) issued its first National Action Plan (NAP) on Responsible Business Conduct (RBC).¹ To mark the 10th anniversary of the UNGPs on June 16, 2021, Secretary Antony Blinken announced the USG’s intent to revitalize and update the NAP. While this NAP addresses the full range of RBC issues for U.S. businesses operating and investing abroad, it focuses principally on the business responsibility to respect human rights, including through effective due diligence in a rapidly changing risk environment.

Context

Since the publication of the first NAP, the global landscape for RBC has evolved significantly. The ongoing genocide and crimes against humanity against Uyghurs and members of other ethnic and religious minority groups in the Xinjiang Uyghur Autonomous Region (Xinjiang) of the People’s Republic of China, Russia’s unlawful full-scale war on Ukraine, and increased misuse of digital technologies to suppress the exercise of human rights both online and offline, among other major developments, introduce new risks and considerations for businesses with global value chains.² At the same time, crises such as climate change and the COVID-19

¹ RBC is a broad concept based on the growing evidence that businesses can perform well while doing good and that governments should create and facilitate the conditions for this to take place. The principles underlying this concept are encompassed in the OECD Guidelines and the UNGPs. They place importance on three aspects of the business-society relationship: (1) emphasizing and accentuating the positive contributions businesses can make to economic, environmental, and social progress; (2) committing to robust due diligence efforts, including identifying and mitigating adverse impacts of business conduct and remedying abuses where they occur; (3) ensuring businesses are aware of and complying with legal obligations within their supply chains both at home and overseas.

² A business value chain includes entities with which a business has a direct or indirect business relationship and which either (a) supply products or services that contribute to the business’s own products or services or (b) receive products or services from the business.

pandemic have exposed the fragility of value chains, highlighting the need to prioritize resilience and sustainability as key components of successful business models.

In response to these challenges, the USG developed novel approaches to promoting RBC. The United States established the first rapid response mechanism for denials of labor rights in the United States-Mexico-Canada Agreement; passed groundbreaking legislation such as the Uyghur Forced Labor Prevention Act (UFLPA), the Infrastructure Investment and Jobs Act, and the Inflation Reduction Act; and expanded the use of traditional tools of statecraft like import and export controls, sanctions, and visa restrictions to increase protections for human and labor rights. Under the Biden Administration, agencies across the USG have pursued policies, initiatives, and programming to promote respect for human and labor rights, expand the use of green energy, further a just transition, counter corruption, protect human rights defenders (HRDs), advance gender equity and equality, and promote rights-respecting technology.

The private sector likewise responded to this changing global landscape by increasing the quantity and quality of due diligence. Yet, value chain opacity, traceability challenges, lack of guidance from governments, conflict, and weak rule of law in many of the countries where businesses operate all make it difficult for businesses to carry out effective due diligence.

Our Commitment

Government plays a critical role in creating an enabling environment for businesses to succeed while upholding the highest standards of conduct. Through this NAP, the USG commits to leverage our resources to strengthen RBC and encourage business to address adverse business impacts, including on human and labor rights and the environment. This commitment includes deepening engagement with civil society, organized labor, and the private sector; providing businesses with tools and incentives to conduct due diligence; strengthening coordination with governments; and applying best practices and lessons learned to USG operations. By bolstering efforts to conduct effective due diligence, implementing lessons learned in consultation with affected stakeholders, and

working with partner governments, we aim to raise standards to achieve better outcomes for all.

Organization of the National Action Plan

The NAP is divided into three sections. Section I focuses on the USG's approach to due diligence and expands on our expectations regarding human rights due diligence (HRDD) as a key component of our broader efforts to promote RBC globally. Section II details four priority areas that emerged from stakeholder consultations and summarizes forward looking commitments within these key areas. Section III contains details on these priority areas and additional commitments to promote and incentivize RBC.

Section I: Responsible Business Conduct and Due Diligence

The U.S. Government Approach to Responsible Business Conduct and Due Diligence

The USG recognizes the positive contributions U.S. businesses make to strengthening communities at home and abroad by generating economic growth, creating jobs, upholding the rule of law, promoting fair labor standards, and encouraging respect for human rights and the environment. Through its innovation and development of new technologies, the private sector is at the center of solving some of society's greatest challenges. Businesses adhering to strong RBC practices throughout their value chains both lift standards around the world and help level the playing field, including for U.S.-based businesses and workers. The USG regularly works with U.S. businesses to support their RBC efforts which enables them to continue to play a leadership role on the global stage. At the same time, the USG takes seriously its duty to protect against adverse impacts of business activity. We do this by regulating business activity, strengthening due diligence practices, and providing and facilitating access to remedies for adverse outcomes.

Regulation of business activity to strengthen RBC can be traced back to 1930, when President Herbert Hoover signed legislation, now codified as 19 U.S.C. 1307, that prohibited the importation into the United States of any product that was mined, produced, or manufactured wholly or in part by convict labor, forced labor, and/or indentured labor under penal sanctions, including forced or indentured child labor. In doing so, the United States established a clear stance against forced labor and laid the groundwork for future efforts to combat forced labor. Almost a half century later, in 1977, with bipartisan support in Congress, President Jimmy Carter signed into law the Foreign Corrupt Practices Act (FCPA) to prohibit bribery of foreign officials by certain business enterprises and individuals and to establish certain mandatory accounting and bookkeeping practices. This landmark legislation promoted sound business practices and fostered a level playing field in international commerce. Many business leaders now appreciate that the FCPA offers them a measure of protection against foreign corruption. For over four

decades, the FCPA has served as a global model in the fight to combat official corruption and promote commercial activity under the rule of law.

Shifting to the present, the UFLPA, signed into law by President Joe Biden in December 2021, prohibits U.S. businesses from importing goods into the United States produced either wholly or in part in Xinjiang or produced by entities identified on the UFLPA Entity List unless the Commissioner of U.S. Customs and Border Protection (CBP) determines that clear and convincing evidence indicates that the goods were not produced with forced labor. Recognizing the overwhelming prevalence of forced labor practices in Xinjiang, the UFLPA represents another important step forward in advancing the U.S. regulatory approach to combating forced labor.

Through these laws, the USG incentivizes businesses to conduct due diligence. Additionally, the USG takes regulatory measures that reinforce and amplify the USG's approach to due diligence. Prohibitions against federal contractors and sub-contractors engaging in trafficking in persons or using forced or indentured child labor; preferential purchasing for sustainable environmental practices in new contracts; export controls; and trade laws and regulations are all tools the USG uses to promote RBC and incentivize due diligence in both the private and public sectors.

The U.S. Government Expectations for Businesses on Human Rights Due Diligence

The USG expects businesses to conduct HRDD throughout their value chains in line with internationally recognized standards set out in the UNGPs and the OECD Guidelines as well as in the International Labor Organization's (ILO's) Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy ("MNE Declaration"). Businesses should treat these standards and principles as a floor rather than a ceiling for implementing responsible business practices while incorporating lessons learned and striving for continuous improvement. Building up from these standards and principles, businesses should implement sector-specific standards developed in collaboration with governments, civil society, labor unions, and businesses. Such standards should provide credible metrics that

meaningfully measure progress on the impact of businesses on people across value chains.

Given its centrality to responsible and effective business operations, HRDD should be an integral part of decision-making and embedded into existing risk management systems with support from the highest levels of the business. Unlike due diligence on risks to the business such as financial and market risks, HRDD focuses on preventing and addressing risks to people. The USG expects all businesses to conduct HRDD regardless of their size, sector, operational context, ownership, or structure. Nevertheless, the scale and complexity of the means through which businesses meet their responsibility to respect human rights consistent with the UNGPs may vary according to these factors. HRDD is intertwined with due diligence efforts pertaining to other forms of RBC, particularly concerning the environment and combating corruption, which may carry direct and indirect risks related to human rights.

In conducting HRDD, a business identifies, anticipates, prevents, mitigates, and accounts for how it addresses actual or potential adverse impacts on human rights. This includes impacts which it may cause, to which it may contribute, or to which it is otherwise directly linked through a business relationship. Among the factors that should be considered where impacts are directly linked include the business's leverage over the entity concerned, how crucial the relationship is to the business, the severity and likelihood of the risk of abuse, and whether terminating the relationship with the entity would have adverse human rights consequences.

Characteristics of HRDD include:

- **Metrics to Assess and Address Risks:** The amount and depth of due diligence should be commensurate with the severity and likelihood of an adverse impact, where more significant risks are prioritized (e.g., due to the type of product or service involved and/or the operating context).
- **Ongoing Assessment, Monitoring, and Evaluation:** Iterative, responsive, and adaptable processes that include monitoring, evaluation, and feedback loops should verify whether adverse impacts are being effectively addressed and new potential impacts identified.

- **Consistent Stakeholder Engagement:** Ongoing communication with those whose rights could be affected by the business's activities and organizations that represent them should guide every step of the due diligence process to shape understanding of the risks and strengthen access to remedy, including through effective grievance mechanisms.
- **Public Communication:** Communication should occur at least annually and should share business's commitment to a rigorous internal and external review of risks as well as adequate measures taken to address these risks.
- **Grievance Mechanism:** A grievance mechanism to capture feedback on human rights impacts and risks from affected stakeholders should be secure, accessible, responsive, and include communication channels for internal and external reporting of possible misuse of a product or service. Businesses may also participate in third-party grievance mechanisms such as state or non-judicial dispute resolution, procedures developed with an independent union or trade union federation, and/or localized grievance mechanisms. The mechanism(s) should be legitimate, accessible, predictable, equitable, rights compatible, and developed in consultation with those for whom it is intended.
- **Alignment With Human Rights Instruments:** The review process should be consistent with the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the OECD Guidelines, the ILO MNE Declaration, and the UNGPs.

The USG expects businesses to conduct heightened HRDD in conflict-affected contexts in line with the [UN Development Program Guide on Heightened HRDD for Business in Conflict-Affected Contexts](#). Businesses should assess the impacts of their actions not only on people but also on the conflict itself. This means conducting ongoing conflict analyses that identify the driving dynamics in the conflict and the main actors involved, especially if those actors have a relationship to the business. Heightened due diligence should commence as soon as warning signs of a conflict are present.

In addition, the USG expects businesses to account for populations that face disproportionate impacts of business activity in conducting HRDD. Best practice dictates developing policies to protect HRDs and taking steps to prevent reprisals against defenders. Throughout their HRDD efforts, businesses should account for the disproportionate harms business activity can have on marginalized populations, including women and girls in all their diversity; persons with disabilities; members of ethnic, religious, linguistic, or racial minority groups; Indigenous Peoples; LGBTQI+ persons; children; and migrant workers.

Section II: Priority Areas of the National Action Plan on Responsible Business Conduct

Informed by consultations with a wide spectrum of stakeholders from civil society, labor unions, affected communities, academia, and the private sector, the USG identified four priority areas with commitments to promote and incentivize RBC and to accelerate business implementation of effective HRDD practices. These priority areas complement, and are not intended to repeat, other USG plans and directives such as the Open Government Partnership NAP; the Presidential Memorandum on Advancing Worker Empowerment, Rights, and High Labor Standards Globally (“Global Labor Strategy”); and the NAP to Combat Human Trafficking.

- 1. *Priority Area (1) Establishing a Federal Advisory Committee on Responsible Business Conduct:*** The USG considers coordination with nongovernmental stakeholders to be a foundational principle of RBC and a core operating principle for democratic societies. To enable the USG to better coordinate policies, programming, and initiatives related to RBC, including business and human rights (BHR), with the private sector; affected communities; labor unions; civil society, including HRDs; academia; and other relevant stakeholders, the U.S. Department of State (“State”) has established a Committee on RBC pursuant to the Federal Advisory Committee Act. The RBC Advisory Committee will enable expert stakeholders to advise the USG on pressing issues such as HRDD, the implementation of the OECD Guidelines, critical minerals, and other relevant RBC topics. The RBC Advisory Committee will further serve as a venue for follow-up on NAP implementation and will continue building upon progress made throughout the NAP process long after its publication.
- 2. *Priority Area (2) Strengthening Respect for Human Rights in Federal Procurement Policies and Processes:*** As the largest single purchaser of goods and services in the world with more than \$700 billion in spending last year alone, the USG has unique leverage to protect human rights in federal supply chains. The United States has long had a policy of prohibiting

government employees and contractor personnel from engaging in trafficking in persons and procuring products made with forced or indentured child labor. The efficacy of this policy was strengthened in 2015 when a Federal Acquisition Regulation (FAR) rule, titled “Combating Trafficking in Persons,” was updated to implement trafficking-related prohibitions for federal contractors and subcontractors.

Through this NAP, the USG commits to strengthen implementation of the existing regulations that prohibit human trafficking, trafficking-related activity, and forced or indentured child labor. To better identify violations of these prohibitions in the FAR, the USG will complete a review of reporting mechanisms as set forth in priority action 4.4.7 of the NAP to Combat Human Trafficking and will thereafter identify options for improving methods through which workers and civil society can inform the USG of human trafficking violations by federal contractors and subcontractors. In addition, State will pilot a new human trafficking risk mapping process for high-risk and high-volume contracts to assist the acquisition workforce as well as federal contractors to conduct greater due diligence during project design, solicitation, and monitoring. See Section III for additional details.

3. *Priority Area (3) Strengthening Access to Remedy:* Among the three pillars of the UNGPs, implementation of the third pillar, access to remedy, has been the weakest. The USG commits to strengthen access to remedy and to enable communities affected by USG investments or who utilize USG dispute mechanisms to access remedy safely and without reprisal. To do so, agencies and offices will strengthen USG-based due diligence processes and grievance mechanisms in consultation with external stakeholders through the following measures, all of which are further elaborated upon in Section III:

- **State:** State will enable stakeholders to seek resolution of RBC issues by strengthening the U.S. National Contact Point (NCP) for the OECD Guidelines through increased stakeholder engagement, including creating a new advisory body; proposing changes to the NCP’s confidentiality policy and otherwise improving procedures, including by updating them in line with the 2023 update to the OECD Guidelines;

- developing one of the first NCP policies on reprisals; improving accessibility of the NCP website; and evaluating technical, personnel, and policy options to strengthen the NCP.
- U.S. Department of Labor (DOL): DOL will develop innovative access to remedy systems through funding a \$2 million technical assistance project implemented by the ILO that promotes worker-driven social compliance and protects labor rights in global value chains.
 - U.S. International Development Finance Corporation (DFC): DFC will strengthen protections against reprisals for groups and individuals through an updated policy commitment, developing internal guidance for responding to allegations of retaliation, and enabling anonymous complaints in DFC grievance mechanisms.
 - U.S. Department of the Treasury (“Treasury”): Treasury will advocate for effective remedy systems at multilateral development banks, including the International Finance Corporation (IFC) and Multilateral Investment Guarantee Agency (MIGA), for project-affected communities, which includes robust responsible exit principles.
 - Export-Import Bank of the United States (EXIM): EXIM will engage with Export Credit Agency (ECA) counterparts on strengthening remedy procedures and will engage in public outreach to solicit input on how to improve access to remedy and the efficacy of project-based grievance mechanisms.
- 4. *Priority Area (4) Providing Resources to Businesses:*** As U.S. businesses seek to conduct effective HRDD, they must contend with different regulatory environments; country- or sector-specific risks; and expectations from investors, consumers, and the government. To provide clear guidance to businesses so they may develop informed policies and practices, the USG will establish the RBC and Labor Rights InfoHub, an online repository to communicate an all-of-government point of view, approach, and suite of resources to advance labor rights outcomes in business operations and value chains. DOL will develop this resource and encourage its dissemination

across the USG. Under the NAP, new guidance beyond labor rights will be developed such as due diligence guidance for investors considering investments in technologies that could enable or exacerbate human rights abuses and business advisories for companies, investors, and other stakeholders who do business in or engage in transactions involving specific countries, regions, or sectors with heightened human rights risk. This week, we released U.S. Guidance for Online Platforms on Protecting Human Rights Defenders Online and will soon release guidance on Tribal Consultation and Engagement With Indigenous and Affected Communities.

Section III: Additional National Action Plan Commitments

The following list of commitments elaborates on certain priority area commitments and lists additional actions the USG will take to advance RBC.

Expanding Engagement and Coordination on Responsible Business Conduct

Given the cross-cutting nature of RBC issues today, coordination and communication between the USG, rights-holders, the private sector, civil society, labor unions, and academia will be critical to continue advancing RBC and enabling businesses to conduct HRDD. The following commitments seek to build on the momentum generated by the NAP by establishing new processes, practices, and mechanisms to continue RBC engagement after NAP publication.

Table 1: Expanding Engagement and Coordination on Responsible Business Conduct Commitments

Agency	Commitment
Department of State	<p>State will evaluate and assess the impact of potential approaches to implementing RBC Reporting Requirements, which would build on previous models of public reporting related to HRDD and RBC-related issues. The United States and other governments have employed a range of models for public reporting on RBC, noting both challenges companies face in providing information that may be sensitive, confidential, or involve security or other such risks. Public reporting is an integral part of robust HRDD, and State will work with other agencies to identify approaches that can build on lessons learned to assess potential model(s).</p>

Agency	Commitment
<p>Department of State (in coordination with other government agencies)</p>	<p>State, in coordination with other government agencies, will deploy appropriate tools, including economic sanctions, visa restrictions, and export control measures, to promote accountability for relevant actors for BHR-related abuses. The USG maintains and implements several tools to promote accountability for individuals and entities that are responsible for actions that run counter to RBC principles, including human rights abuses, labor abuses, corruption, and wildlife and timber trafficking. These tools apply a range of specific pressures and impacts, including denying officials the right to enter the United States, restricting export privileges, and blocking assets.</p>
<p>Department of State (in coordination with other government agencies)</p>	<p>State will coordinate with other government agencies, businesses, civil society, labor unions, and other relevant stakeholders to produce additional business advisories, where appropriate, to inform businesses and individuals about risks associated with events and developments in particular countries, regions, or sectors. These business advisories provide information that can help inform business decision-making, including in areas that are not subject to sanctions, export controls, or other mandatory restrictions.</p>
<p>Department of State</p>	<p>State will launch a BHR training for Department officers. This training will help DC-based and embassy personnel understand what BHR is, why it is integral to U.S. foreign policy, and how BHR issues may present in their work.</p>
<p>Department of State</p>	<p>State will strengthen policy coordination around BHR with other governments. This will include greater information-sharing and consultations with other governments as well as consideration of joint policy initiatives around topics of mutual interest.</p>

Agency	Commitment
Department of State	<p>State will leverage its Chairship (Chair through May 2025) of the Voluntary Principles on Security and Human Rights Initiative (VPI) to make meaningful governance reforms and expand membership of the Initiative to include other land-intensive industries. The VPI is a multistakeholder initiative that provides guidance to companies on providing security for their operations in a manner that respects human rights.</p>
Department of State	<p>Under the Global Initiative to Galvanize the Private Sector as Partners in Combating Corruption (GPS), State’s Bureau of International Narcotics and Law Enforcement (INL) will develop tools for increasing integrity in due diligence. These tools will support harmonization and streamlining of anti-corruption, human rights, labor, and environmental due diligence processes.</p>
U.S. Agency for International Development	<p>Through the Public-Private Alliance for Responsible Minerals Trade (PPA), the U.S. Agency for International Development (USAID) will promote increased alignment of industry operations and governance mechanisms to the OECD Guidance and local governance expectations; amplify insights from high-quality independent data that identify key barriers to impactful due diligence; and test and analyze solutions to these challenges. The PPA is a global partnership between civil society, the USG, and the private sector to leverage members’ knowledge, networks, and experience to inform global responsible minerals sourcing.</p>

Procurement

The USG has immense leverage to incentivize RBC through its procurement processes. U.S. prohibitions on human trafficking and child labor in federal supply chains have been pivotal to the effort to prevent U.S. taxpayer dollars from enabling human and labor rights abuses. The following commitments strengthen implementation of these regulations and expand areas through which the USG may be able to promote and incentivize RBC by government contractors and subcontractors.

Table 2: Procurement Commitments

Agency	Commitment
Department of State	<p>State’s Office to Monitor and Combat Trafficking in Persons and the Bureau of Overseas Building Operations will partner together to pilot a new human trafficking risk mapping process for acquisition personnel aimed at assessing and preventing risks during the design, solicitation, and monitoring of State construction contracts. Learnings will be used to apply to broader procurement efforts within State, especially contracts of high risk and high volume, and will be shared with the interagency.</p>
Department of Defense	<p>The U.S. Department of Defense (DoD) will conduct a review to evaluate the value of encouraging or requiring membership in the International Code of Conduct Association for Private Security Providers’ Association for its private security company (PSC) vendors as part of its commitment to continuously reviewing, updating, and strengthening its policy and oversight for contracted private security functions. While DoD already has a third-party certification requirement in place for its private security contractors, ongoing evaluation and review of options will ensure DoD continues to uphold its commitment to strengthening PSC oversight structures and incentivizing PSCs to engage in RBC.</p>
Department of Homeland Security	<p>The U.S. Department of Homeland Security (DHS), CBP will draft guidance to direct the proactive consideration on a case-by-case basis, suspension and debarment whenever CBP issues a penalty under the customs laws for repeated violations of 19 U.S.C. § 1307 or other laws CBP enforces to combat forced labor. The guidance will also encourage consideration of suspension and debarment on a case-by-case basis when CBP issues withhold release orders</p>

Agency	Commitment
	<p>(WROs) or Findings against entities or individuals. Suspension and debarment actions prevent agencies from contracting or engaging in other covered transactions directly with an entity or individual who is not presently responsible to do business with the federal government. Suspension and debarment also prevents contractors already in the federal marketplace from subcontracting with excluded entities.</p>
<p>Federal Acquisition Regulatory Council</p>	<p>The Federal Acquisition Regulatory Council, consisting of the Office of Federal Procurement Policy, the General Services Administration, DoD, and the National Aeronautics and Space Administration, will consider regulatory changes to reduce or eliminate the ability of federal contractors to contract with subcontractors who have been debarred, suspended, or proposed for debarment. FAR 9.4052(b)'s \$35,000 exemption threshold for subcontracting with contractors debarred, suspended, or proposed for debarment will be reviewed. In conjunction with increased consideration of suspension or debarment for entities subject to WROs, regulatory changes may not only help ensure entities subject to WROs take corrective action but will also help prevent items made with forced labor from being procured with federal dollars.</p>
<p>Department of Labor</p>	<p>Labor's Bureau of International Labor Affairs (ILAB) will make it easier for contractors to identify "high-risk" sectors for federal contracts by standardizing naming conventions between their lists and those in the FAR and improving access for contractors to a designated ILAB webpage with information about USG resources, including ILAB's child labor and forced labor reports. The technical amendment will harmonize naming conventions between the FAR and DOL to eliminate confusion. The webpage will make information more accessible to those in the contracting and procurement communities.</p>
<p>Department of Labor</p>	<p>ILAB will map the "List of Goods Produced by Child Labor or Forced Labor" to Product Service Codes (PSC) and country information to increase use by the acquisition workforce. DOL maintains the "List of Goods Produced by Child Labor or Forced Labor" to raise public awareness about forced labor and child labor around the world and to promote efforts to combat them; it is not intended to be punitive, but rather to serve as a catalyst for more strategic and focused coordination and collaboration among those working to address these</p>

Agency	Commitment
	<p>problems. Mapping the named products to PSC will facilitate analysis of procurement data by country of origin and additional protections, such as those outlined in M-20-01, Anti-Trafficking Risk Management Best Practices & Mitigation Considerations, and could be imposed in awards with heightened risk of forced labor issues.</p>
<p>Department of State</p>	<p>INL, in partnership with the OECD and under the GPS, will increase integrity in public supply chains by developing a best practice toolbox built on OECD standards for risk-based due diligence, public procurement, and integrity. This toolbox will bring together suppliers, public buyers, and integrity public officials in a trustworthy environment to define practical steps businesses and governments can take to increase integrity in supply chains.</p>
<p>Senior Policy Operating Group’s Procurement & Supply Chains Committee</p>	<p>The Senior Policy Operating Group’s Procurement & Supply Chains Committee will facilitate the production of a video informing workers of their rights under federal government contracts and subcontracts, with information about where and how to report violations.</p>
<p>Hotlines Working Group</p>	<p>The Hotlines Working Group chaired by the Department of Health and Human Services (HHS), DHS, and the Department of Justice will coordinate within the interagency to identify options for improving methods through which workers and civil society can inform the USG of potential human trafficking violations in federal contracts after completing its ongoing review of reporting mechanisms as set forth in Priority Action 4.4.7 of the NAP to Combat Human Trafficking.</p>
<p>Department of Health and Human Services</p>	<p>HHS will work with industry partners, civil society, unions, individuals with lived experience, and other subject matter experts to develop and make available a suite of sector-specific tools, including online training, recommendations, model policies, and a resource portal, to prevent forced labor, human trafficking, and related practices in the supply chains (including purchased services) of U.S. health systems and public health institutions, pursuant to the Trafficking Victims Protection Act of 2000 (TVPA), as amended by the National Defense Authorization Act for Fiscal Year 2013, and Federal Acquisition Regulation Subparts 22.15 and 22.17.</p>

Access to Remedy

The third pillar of the UNGPs provides there should be access to effective remedy for business-related human rights abuses. The United States recognizes the value of effective grievance mechanisms and is committed to strengthening USG-based grievance mechanisms. The following commitments seek to strengthen access to remedy for communities and workers, including those who may be adversely affected by business activity and projects funded by the USG.

Table 3: Access to Remedy Commitments

Agency	Commitment
<p>Department of State</p>	<p>State will build on progress to date and intends to make the following significant changes to further improve the NCP. Note that some of these intended changes, particularly including those that involve changing rules of procedure, will be pursued subject to a public notice and comment process.</p> <p>Easing confidentiality: We propose to make the following changes to the confidentiality policy of the NCP:</p> <ul style="list-style-type: none"> • Make public the existence and status of pending cases on the NCP’s website, which, prior to the initial assessment, would only include party names if both parties agree. • Issue our Initial Assessments as public documents, in a summary form, after changing our rules of procedure. <p>Supplementing pool of mediators with additional expertise: We propose to change our rules of procedure to provide for the possible addition of subject-matter experts to work alongside and in addition to our mediators.</p> <p>Promoting “high-road”³ corporate practices: In all Specific Instances in which the NCP offers good offices, including in the event of failure to reach resolution through good offices and any Specific Instance where an enterprise fails to respond, the NCP will endeavor to include specific recommendations, as</p>

³ For the purposes of the NCP, “high-road” corporate practices include, but are not limited to, providing well-paying, safe, healthy, and decent jobs, respecting labor rights, and implementing joint worker-management initiatives that advance compliance with labor rights both domestically and abroad.

Agency	Commitment
	<p>appropriate, in Final Statements that address concerns raised, promote high-road practices, and/or encourage actions consistent with the OECD Guidelines.</p> <p>Establishing an anti-reprisal policy: We plan to issue a clear and strong policy against reprisals. The policy is intended to address the risk of reprisals against persons or groups, including human rights, labor, and environmental defenders, against actions taken because they have submitted or are considering submitting a Specific Instance to the NCP. We will be among the first NCPs to take this significant step.</p> <p>Creating a new external advisory body for the NCP: We will create a subcommittee of the new RBC Advisory Committee to advise the NCP. This subcommittee will effectively take the place of the former Stakeholder Advisory Board.</p> <p>Provision for greater follow-up: We propose to change our rules of procedure to encourage routine follow-up on cases after their conclusion. This will confirm our recent practice of using follow-up to effect change (e.g., where the NCP requests a party to report back on what it has done to address an alleged RBC problem).</p> <p>Reflecting the 2023 update to the OECD Guidelines: We intend to update our rules of procedure to reflect the update to the OECD Guidelines adopted last year.</p> <p>Publishing a promotional plan: We intend to develop and issue a plan to promote the OECD Guidelines with business and to raise awareness of the role of the NCP. Purposes of the plan will include to confirm that our much-expanded stakeholder outreach is evenhanded, to increase awareness of the OECD Guidelines and the Specific Instance process among underserved and underrepresented stakeholders, and to improve reception of the OECD Guidelines and the process among U.S. businesses.</p> <p>Improving our online outreach: We plan to improve the accessibility of the NCP’s website on state.gov to make it more informative and easier to navigate.</p> <p>Considering further changes: We will consider additional, further changes as we continue making efforts to further strengthen the NCP in close consultation with stakeholders, including through the new RBC Advisory Committee and its</p>

Agency	Commitment
	planned subcommittee. Our aims will include strengthening access to remedy, demonstrating USG implementation of the UNGPs and the OECD Guidelines, and furthering the Biden Administration’s Global Labor Strategy.
Department of Labor	ILAB will fund a project to improve the implementation of worker-driven social compliance systems that promote fundamental labor rights and acceptable conditions of work, including the elimination of forced labor, in supply chains. Piloted in the Indonesian palm oil sector, this project will create or refine a model for social compliance systems that can be replicated in other countries and sectors to help ensure that workers have a say in securing for themselves fair working conditions. The duration of this project will be three years.
International Development Finance Corporation	DFC will strengthen protections for individuals and groups voicing complaints and enhance its capacity to respond when retaliation does occur. DFC will codify its commitment to zero tolerance for retaliation in its updated Environmental and Social Policy and Procedures (ESPP); develop and implement internal guidance for responding to allegations of retaliation; and ensure existing DFC complaints mechanism procedures enable anonymous complaints.
Department of the Treasury	Treasury will advocate for an effective remedy system at multilateral banks, including IFC and MIGA, which includes robust principles on “responsible exit.” This advocacy will inform IFC and MIGA’s development of the “IFC/MIGA Approach to Remedial Action.” This approach seeks to minimize the occurrence of environmental and social harm in IFC and MIGA projects through improving the implementation of environmental and social safeguards, while also supporting remedial action to communities to address harm when needed.
Export-Import Bank of the United States	EXIM will solicit public input on how to strengthen the effectiveness of project-based grievance mechanisms. This will include outreach to interested stakeholders and an opportunity for the public to provide feedback on this subject. This feedback will inform the agency’s efforts to work with other export credit agencies in establishing improved standards for project-based

Agency	Commitment
	grievance mechanisms as well as its own evaluation of the adequacy of such mechanisms in the project context.
Export-Import Bank of the United States	EXIM will engage with ECA counterparts on ways to strengthen best practices around access to remedy. Working through the OECD Common Approaches and the Equator Principles, EXIM will review and look to improve the ability for local communities to have meaningful access to remedy.

Technology

As a leader in scientific development, technological progress, and business innovation, the United States plays a critical role in advancing respect for democracy and human rights in the design, development, governance, and use of technology and continues to work to advance an open, interoperable, secure, and reliable Internet. Through our engagement with businesses and with multilateral and multistakeholder initiatives, the USG can further a free, open, and secure digital ecosystem aligned with respect for democratic principles and human rights, while countering the misuse of technology globally from artificial intelligence-powered mass surveillance and censorship at scale to violations of privacy through targeted cyber intrusions without proper safeguards or legal authorities. The following commitments leverage diplomatic tools and initiatives to strengthen respect for democracy and human rights in the technology sector.

Table 4: Technology Commitments

Agency	Commitment
<p>Department of State</p>	<p>State will lead an interagency task force to drive outreach to international partners on issues regarding content authenticity and provenance. The task force will build on diplomatic efforts to internationalize the U.S. voluntary commitments to ensure safe, secure, and trustworthy AI and to solidify broad global consensus on an international approach to AI technologies. State will lead the task force to accomplish the following objectives:</p> <ol style="list-style-type: none"> 1) Develop and promote a global norm for countries to detect AI-generated synthetic content and label authentic government-produced content; 2) Discuss and develop mechanisms to share information and best practices on content authentication and synthetic content detection, leveraging existing platforms and dialogue structures; 3) Advance support for developing countries and civil society to conduct content authentication and provenance, including providing technical consultations, exchanges, and assistance; 4) Encourage engagement by foreign partners in the U.S. Department of Commerce’s (“Commerce’s”) process around standards, tools, methods,

Agency	Commitment
	<p>and practices for content authentication, identification, and labelling, as well as preventing the use of AI models to generate nonconsensual intimate images; and</p> <p>5) Support engagement with international standards bodies to encourage a common global content authentication standard.</p>
<p>U.S. Agency for International Development</p>	<p>USAID will launch a five-year Advancing Digital Democracy (ADD) program in 2024. The program will strengthen rights-respecting digital ecosystems to promote the use of technology and data to advance rather than undermine democratic values and human rights. A key objective for ADD is to increase the extent to which human rights considerations are embedded in the design, development, deployment, use, and procurement of digital technologies. To achieve this key objective, ADD will support multistakeholder approaches that strengthen networks among government, civil society, academia, technology professional associations, consumer rights groups, and local private sectors and increase their capacity and resources to grow rights-respecting digital economies in USAID partner countries.</p>
<p>Department of Commerce</p>	<p>The National Telecommunications and Information Administration (NTIA), a bureau within Commerce, will publish a report on creating mechanisms for earned trust in AI systems. NTIA published a Request for Comment in 2023 and is using this feedback and discussions with stakeholders to write the report. The report will address audits, assessments, certifications, and other mechanisms that can help provide assurance an AI system is trustworthy.</p>
<p>Department of State</p>	<p>State will internationalize efforts related to responsible government design, development, use, procurement, and deployment of AI through multistakeholder and multilateral initiatives. State will engage with the Freedom Online Coalition (FOC) to develop a pledge on responsible government development, use, and procurement of AI and will work with FOC members to develop new workstreams to promote knowledge-sharing among member governments to operationalize responsible AI principles. State will also continue to engage with the various regional and international organizations active in those efforts, including the International Telecommunication Union and its AI for Good platform-related efforts, as well</p>

Agency	Commitment
	as the UN Educational, Scientific and Cultural Organization (UNESCO), including UNESCO's implementation efforts in the public and private sectors for its Recommendation on the Ethics of AI to help advance human rights-based approaches to the development of AI systems and mitigate potential risks of the misuse of AI, including in procurement.
Department of State	State will designate staff as human rights and technology officers to increase engagement at key multilateral fora, as part of related State and U.S. interagency workstreams, and at bilateral cyberspace and digital policy dialogues. These officers will advance innovative development, application, and rights-based governance of AI systems and other technologies.
Department of State	State will further implementation of the Export Controls and Human Rights Initiative Code of Conduct ("Code"). State will lead a multilateral discussion with Subscribing States to further identify, define, and share best practices in implementing the UNGPs as part of the Code.
Department of State	State, in consultation with relevant interagency partners, will lead development of guidance to encourage investors to conduct HRDD when considering investments in technologies that could enable or exacerbate human rights abuses. State, in consultation with civil society, including labor organizations, and private equity and venture capital investors, will develop guidance to discuss downstream risk factors associated with the misuse of technology, potential safeguards throughout the product lifecycle, how investors can influence business decisions in companies whose technologies have been proven to enable human rights abuses if used improperly, and best practices in conducting HRDD.
Department of State	State will designate a labor and AI expert to increase engagement on the impact of AI throughout labor-related workstreams. The expert will consult with regional and functional teams on opportunities to increase attention to the impact of AI on internationally recognized labor rights, workplace safety, worker well-being, and labor rights issues arising within the AI value chain such as in data labeling and content moderation across multiple State workstreams.

Agency	Commitment
Department of State	<p>State, in its implementation of the U.S. Strategy to Prevent and Respond to Gender-Based Violence Globally, will engage with the private sector to identify solutions to technology-facilitated gender-based violence (TFGBV) through the Global Partnership for Action on Gender-Based Online Harassment and Abuse (“Global Partnership”). The Global Partnership focuses its work on three strategic objectives: advance national, regional, and multilateral policies; scale programming and resources; and strengthen the evidence base for preventing and responding to TFGBV. The Global Partnership will engage the private sector, including technology platforms, through expansion of its multistakeholder Advisory Group and through a series of dialogues to increase shared understanding of and identify solutions to TFGBV in line with the Global Partnership’s three strategic objectives.</p>
Department of State	<p>State will launch a new program, “Safe Online: Empowering Women in the Digital Economy,” to address risks of TFGBV facing women in business and the obstacles to women’s inclusion in the digital economy in Armenia and Georgia. In partnership with local organizations in each country, the program will encourage governments and private companies to implement online TFGBV and sexual harassment policies to improve the enabling environment for women in business. This program is supported by the Gender Equity and Equality Action Fund.</p>
Department of State	<p>State will work with Treasury to convene an interagency working group to strengthen human rights safeguards that apply to multilateral development bank funded telecommunications infrastructure projects.</p>
Department of State	<p>State will engage with Internet Service Providers (ISPs) on best practices for how ISPs can mitigate risks of Internet shutdowns. These best practices will be developed through a multistakeholder group focused on network restrictions or disruptions and will be promoted multilaterally.</p>
Department of State	<p>State is releasing U.S. Guidance for Online Platforms on Protecting HRDs. The USG, building upon joint guidance released with the European Union through the U.S.-EU Trade and Technology Council, is publishing detailed guidance for online platforms on how companies can effectively collaborate and coordinate with civil society and other relevant stakeholders to identify, address, mitigate,</p>

Agency	Commitment
	prevent, and enable access to remedies for online threats and attacks against HRDs.
Department of Labor	<p>DOL will explore the effects of the digitalization of the labor market on workers' rights and identify best practices for companies to address negative impacts. Digitalization of the labor market holds significant potential to increase productivity, safety, and accessibility for workers but also presents potential risks for workers, including algorithmic bias and non-transparency surrounding automated systems. DOL will engage in efforts to identify best practices for companies to understand and address these impacts, such as adopting measures for companies to provide relevant information to workers on company use of automated systems and promoting among companies the creation of communication channels where workers and their representatives across enterprises can exchange information on the use of automated systems in the world of work.</p>

Workers' Rights

Promoting internationally recognized labor rights, including freedom of association and the right to not be subjected to forced labor, is key to achieving inclusive growth, enhancing stability, and leveling the playing field for U.S. workers and businesses. The USG regularly leverages its diplomatic engagement, trade policy, programming, and reporting to foster respect for internationally recognized labor rights and help develop commitments by key stakeholders to respect these rights. This includes a steadfast commitment to promoting RBC both domestically and internationally.

Moreover, the establishment of the Global Labor Strategy significantly bolsters our efforts in this regard. Through this initiative, the USG will better coordinate its resources and initiatives to address emerging labor rights issues comprehensively. The following commitments seek to strengthen USG capacity to engage on emerging labor rights issues and strengthen implementation of measures that combat the use of forced labor.

Table 5: Workers' Rights Commitments

Agency	Commitment
Office of the U.S. Trade Representative	<p>The Office of the U.S. Trade Representative (USTR) will address forced labor in traded goods and services by establishing a Forced Labor Trade Strategy to identify priorities and establish an action plan for utilizing existing and potential new trade tools. USTR will conduct an interagency review across the USG through the Trade Policy Staff Committee's Subcommittee on Trade, Forced Labor, and Child Labor to examine existing trade policies and tools used to combat forced labor, including forced child labor, in order to identify areas that may need to be strengthened and gaps that may need to be filled. USTR will use this analysis to establish objectives, priorities, new tools, and key action items to advance development of the strategy. The process will maximize input from stakeholders, including victims; labor and human rights organizations; civil society; and the private sector.</p>
Department of Labor	<p>DOL will work toward enabling informal mining operations to better meet international standards by piloting innovative strategies to develop</p>

Agency	Commitment
	<p>traceability initiatives that facilitate companies’ legal purchase of artisanal and small-scale mining (ASM) cobalt under internationally recognized standards from mining cooperatives from the Democratic Republic of the Congo and other countries. DOL technical assistance projects will support efforts to improve ASM-sector mining operations’ compliance with national laws and regulations, meet international standards, and standardize safety and labor protections in the sector.</p>
<p>Department of Homeland Security</p>	<p>DHS will convene biannual stakeholder engagements on the implementation of the UFLPA Strategy to enhance its ability to be responsive to external stakeholder input. These meetings will include stakeholders from the private sector and civil society and will provide key Forced Labor Enforcement Task Force updates on efforts related to the UFLPA Entity List, UFLPA Strategy Updates, diplomatic outreach, and CBP enforcement of the UFLPA rebuttal presumption. Meetings will incorporate a robust discussion on ways to improve RBC with regards to the implementation of the UFLPA in the United States and among international partners.</p>
<p>Department of Homeland Security</p>	<p>CBP and Homeland Security Investigations (HSI), the Center for Countering Human Trafficking’s newly established Forced Labor Investigations Unit, will improve information sharing with the aim to increase the number of WROs and Findings as well as criminal investigations into allegations of forced labor. Increased information sharing will enhance the relationship between HSI and CBP, which will improve CBP’s ability to identify and prevent the entry of products made with forced labor into the United States through the use of WROs and Findings and to enhance HSI investigations into importers who knowingly violate U.S. trade laws and/or benefit from forced labor.</p>
<p>National Oceanic and Atmospheric Administration</p>	<p>The National Oceanic and Atmospheric Administration, in coordination with the Departments of State and Labor, will continue to promote the adoption of international labor standards for crew and observers in international fisheries management bodies. These standards include provisions to ensure that crew have safe, legal, and sanitary conditions aboard fishing vessels and receive adequate remuneration for their work. The standards also call for legal and fair recruitment processes.</p>

Agency	Commitment
<p>U.S. Agency for International Development</p>	<p>USAID will build on its work to advance worker empowerment, human rights, and labor standards through its Global Labor Programming. The program, implemented by the Solidarity Center, Solidar Suisse, and Sightsavers, will work with local civil society partners and trade unions to improve working conditions for marginalized workers; expand fundamental labor rights and social protections for workers; and strengthen the resiliency of trade unions and worker organizations to advocate for better wages and working conditions.</p>
<p>Department of State</p>	<p>State will encourage high labor standards globally by promoting agreements and frameworks between businesses and worker organizations that ensure respect for labor rights. Through diplomacy, State will elevate and encourage social dialogue between businesses and labor organizations, including with independent and democratic trade unions, and promote high-road or best practices such as enforceable agreements between parties to safeguard rights and promote high labor standards in supply chains, sectors, or industries.</p>
<p>Department of Health and Human Services</p>	<p>HHS will launch new resources under its Look Beneath the Surface (LBS) public awareness and outreach campaign on trafficking in persons specific to migrant farmworkers. The LBS campaign encourages help-seeking behaviors among people who may be at risk for or experiencing human trafficking and the professionals who engage with them.</p>
<p>Department of Labor</p>	<p>ILAB will launch an online RBC and Labor Rights Information Hub to communicate a clear point of view, expectations for RBC, and a whole-of-government approach to labor rights throughout business operations and supply chains of U.S. companies. The RBC InfoHub will provide a central repository of USG agency guidance, tools, and resources to facilitate and incentivize adoption of effective corporate accountability models and practices relevant to labor rights outcomes in business supply chains as well as with U.S. government procurement and accountability officers to facilitate efforts to conduct due diligence.</p>

Environment, Climate, and Just Transitions

Climate change and environmental degradation or damage can exacerbate existing risks to the enjoyment of human rights, livelihoods, food security, health of populations, poverty, displacement, and civil and interstate conflict and disproportionately affect marginalized populations. Increasingly, businesses are integrating environmental, social, and governance standards into their decision-making, responding to these challenges as well as emerging requirements for disclosures and value chain transparency related to emissions or other environmental impacts. The following commitments are intended to address environmental impacts of business activity and work toward just transitions that addresses displacement, respect for human rights, and access to meaningful livelihoods.

Table 6: Environment, Climate, and Just Transitions Commitments

Agency	Commitment
International Development Finance Corporation	<p>DFC will update its ESPP by clarifying its clients’ responsibilities in assessing supply chains with high risks of child labor and forced labor, significant health and safety issues, or significant conversion of critical forest areas or critical natural habitat in order to promote due diligence. Through this update, clients will better understand DFC expectations with respect to identifying and managing risks in their supply chains, and DFC will be better positioned to assess supply chain risks to mitigate harm.</p>
International Development Finance Corporation	<p>DFC will enhance stakeholder engagement by enabling robust and diverse public comment on proposed policy changes to its ESPP. To ensure that the ESPP revision process is inclusive of a diverse set of stakeholders and interests, DFC will continue to provide sufficient notice and opportunities for public comment on changes to its ESPP.</p>
Department of State	<p>DRL, through the Office of Global Programs and Initiatives, will award grants for work related to just transitions, focusing on the nexus of climate and labor rights. Climate change has affected labor rights worldwide, including through the loss of agricultural land, pollution,</p>

Agency	Commitment
	heat, and reduced occupational safety and health standards. The grants will be aimed at supporting projects that address the nexus of climate and labor rights such as programs to assist workers to adapt and to learn new skills needed as companies adopt greener technology to address climate issues and carbon emissions.
Office of the U.S. Trade Representative	USTR will advance environmental sustainability at home and abroad by prioritizing trade policies that are resilient, sustainable, and inclusive in the implementation of its framework to advance environmental sustainability. USTR will leverage trade policy tools and associated cooperation to advance environmental sustainability and support mitigating the impact of the climate crisis on underserved and overburdened communities, including by pressing trade partners to continually reassess domestic policies to ensure they provide for high levels of environmental protection.
Department of State, in partnership with the Department of Agriculture	State, in partnership with the U.S. Department of Agriculture's Forest Service, will implement a program in Free Trade Agreement (FTA) partner countries to increase capacity at seed banks and nurseries to promote women's leadership and expertise. This project, Safeguarding the Future: Promoting Gender Equity and Equality and Climate Action Through Seed Banks and Nurseries, will provide opportunities for women through training, education, and networking. The project will enhance the implementation of climate adaptation measures through nature-based solutions and further women's technical knowledge and transferable skills to provide them advancement opportunities in existing seed banks or nurseries and/or help them to start their own enterprises.
Department of State	State, through its embassies and its Bureau of Oceans and International Environmental and Scientific Affairs' (OES') Office of Environmental Quality (ENV), will engage in outreach aimed at increasing civic participation in the environmental submissions mechanisms established by FTAs and operated in connection with FTAs' secretariats on environmental enforcement matters. State's ENV and its embassies located in relevant FTA partner countries – Colombia,

Agency	Commitment
	<p>Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, Panama, Peru, and the Dominican Republic – will find innovative ways to disseminate information on existing environmental submissions mechanisms and will explore opportunities to build capacity in underserved communities (e.g., rural regions, ethnic minorities, communities with low and no Internet connectivity) so they are aware these mechanisms exist and understand their use. The secretariats and related submissions processes promote the effective enforcement of environmental laws, provide an opportunity for civic participation in environmental decision-making, and promote transparency in environmental governance.</p>
<p>U.S. Agency for International Development</p>	<p>USAID will elevate the role of workers, unions, and community leaders in just transition initiatives and work with partners to ensure labor organizations, trade unions, and impacted communities meaningfully participate in energy transition planning. USAID will support partners to pursue ambitious and equitable mitigation efforts to advance just transitions that will have economic, health, ecological, and social benefits. Such mitigation efforts will use an inclusive approach that empowers a broad range of stakeholders, including the labor movement and marginalized and underrepresented groups, to ensure shared and sustained outcomes as well as limit any negative impacts.</p>
<p>Department of State</p>	<p>OES, through its informal interagency working group to reduce violence against environmental defenders, will hold a series of meetings to identify and disseminate good business and investment practices that can reduce and, ideally, prevent violence against environmental defenders. These meetings will include relevant stakeholders including members from civil society organizations and businesses. The identified good business and investment practices will ultimately be shared within the USG.</p>
<p>Department of Health and Human Services</p>	<p>HHS’s Office on Trafficking in Persons (OTIP) in the Administration for Children and Families (ACF) will develop a microlearning module tailored for ACF grant recipients, which provides information about administrative flexibilities available to respond and recover from climate-mediated events and other natural disasters. The</p>

Agency	Commitment
	<p>microlearning will also give considerations for implementing programs through an environmental justice lens (e.g. developing a meaningful, demonstrable, and ethical outreach plan to address the impact of climate change on trafficking risk and vulnerability within underserved communities).</p>
<p>Department of Health and Human Services</p>	<p>OTIP will refresh SOAR Disaster Management: Preventing and Responding to Human Trafficking for the broader anti-trafficking field based on emergent insights. This online training module equips disaster management professionals with the information and resources they need to prevent, identify, and respond to human trafficking during and after disasters or emergencies, including mitigating forced labor during recovery and reconstruction efforts.</p>

Anti-Corruption

Globally, corruption saps economic growth, hinders development, destabilizes governments, undermines democracy, and provides openings for dangerous groups such as criminals, traffickers, and terrorists. The USG coordinates across the globe to prevent graft, strengthen investigation and prosecution of corruption, promote transparency and accountability, and empower civil society and independent media to expose corruption and advance reforms. This makes it harder for criminality and terrorism that affect U.S. security to take root and spread; promotes more democratic, stable governments as partners for the United States; and levels the playing field for U.S. businesses to compete internationally. The following commitments reflect the U.S. whole-of-government approach in addition to those detailed in the U.S. Strategy on Countering Corruption.

Table 7: Anti-Corruption Commitments

Agency	Commitment
Department of the Treasury	<p>Treasury’s Financial Crimes Enforcement Network (FinCEN) will advance a rulemaking effort to increase the transparency of the U.S. real estate sector. On February 7, 2024, FinCEN issued a Notice of Proposed Rulemaking that aims to address the systemic money laundering vulnerabilities associated with the U.S. real estate sector and, consequently, the ability of illicit actors to launder, store, or move criminal proceeds through purchases of real estate. This effort aims to increase the transparency of the U.S. real estate sector, making it more difficult for illicit actors – including corrupt officials, criminal organizations, drug and human traffickers, and others – to launder, move, or store ill-gotten gains through the misuse the U.S. real estate sector.</p>
Department of the Treasury	<p>Treasury will continue to implement the Corporate Transparency Act (CTA) to enhance beneficial ownership transparency for legal persons in the United States. The continued implementation of the FinCEN rule on beneficial ownership information reporting provisions and the revision of FinCEN’s 2016 Customer Due Diligence Rule will aid in the implementation of the CTA and strengthen beneficial ownership transparency for legal persons, such as shell and front companies, in the United States to</p>

Agency	Commitment
	<p>prevent their misuse by illicit actors. On January 1, 2024, FinCEN launched a beneficial ownership filing system pursuant to the CTA. Under this new framework, many companies operating in the United States are now required to report information to FinCEN about their beneficial owners – in other words, the real people who own or control them. This effort will make it more difficult for illicit actors – including corrupt officials, terrorist financiers, criminal organizations, and drug and human traffickers – to misuse opaque corporate structures like shell companies to launder the proceeds of crime.</p>
<p>Department of State</p>	<p>State, in partnership with OECD and under the GPS, will hold a Trusted Dialogue Series on Getting Influence Right. This effort aims to identify core principles of responsible corporate political engagement and produce a set of guidelines, Principles on Responsible Political Engagement for the Private Sector, which will clarify what policies could be implemented to manage and prevent conflict of interest, ensure integrity in lobbying practices and political financing, and uphold the transparent and neutral use of data to inform advice to policymakers.</p>
<p>Department of State</p>	<p>State, in partnership with the OECD and CoST – the Infrastructure Transparency Initiative and under the GPS, will support the implementation of a new Infrastructure Anti-Corruption Toolbox (IACT) containing a wide range of tools and activities to prevent and detect corruption in infrastructure. The toolbox focuses on four areas: knowledge creation, capacity building, public-private cooperation, and enhancing accountability. With IACT, State will advance the Blue Dot Network to help infrastructure project stakeholders, including those in government, private sector, and civil society, to better comply with anti-corruption standards. In addition to the work with OECD, State will use the GPS platform to better integrate private sector input on anti-corruption challenges and potential solutions to inform the work of the USG in foreign assistance as well as policy and multilateral priorities.</p>
<p>Department of the Treasury</p>	<p>Treasury will assess and address the illicit finance risks associated with key financial gatekeepers – such as accountants, lawyers, real estate professionals, investment advisers, and trust and company service providers – and consider potential steps to address these risks. Certain</p>

Agency	Commitment
	<p>types of financial intermediaries, gatekeepers, and other professions or sectors are not covered by comprehensive and uniform Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) obligations and face varying levels of illicit finance risk exposure. This assessment and subsequent action are meant to address the uneven application of AML/CFT measures to key gatekeeper professions and sectors and work to address those risks. On February 7, 2024, Treasury released its 2024 Money Laundering, Terrorist Financing, and Proliferation Financing Risk Assessments, which discuss these issues. In addition, on February 13, 2024, Treasury issued a sectoral risk assessment of the investment adviser sector.</p>
<p>Department of State</p>	<p>Under the GPS initiative, State will support a peer learning community on incentivizing compliance. The community will discuss the challenges faced when governments incentivize anti-corruption compliance programs and identify good practices and other solutions that both governments and companies can use to improve corporate compliance efforts.</p>
<p>Department of State</p>	<p>In partnership with the UN Office on Drugs and Crime (UNODC), State will leverage regional anti-corruption hubs in Mexico, Colombia, Kenya, and Thailand to support anti-corruption reforms. Through the hubs, UNODC and State will provide technical assistance for implementing the UN Convention Against Corruption and other reforms that will level the playing field for businesses operating with integrity.</p>
<p>Department of State</p>	<p>Under GPS, State will support a new effort, Tech Connect for Integrity. The effort matches data or information technology expert(s) from the private sector with their counterparts in the integrity, anti-corruption, or accountability community (e.g., anti-corruption agencies, supreme audit institutions, or internal audit functions). Together, the peers will identify opportunities to strengthen data-driven approaches for preventing, detecting, and mitigating the risks of fraud and corruption.</p>

