



Oslo 21 November 2025

Initial Assessment

Individual vs. Orkla Snacks AS / SIA Orkla Biscuit Production (Latvia)

The National Contact Point for Responsible Business Conduct (NCP) contributes to the resolution of issues that arise relating to the implementation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) in specific instances. The objective of an Initial Assessment is to determine whether the issues raised in the specific instance merit further examination. If so, the NCP will offer or facilitate access to consensual and non-adversarial procedures, such as dialogue or mediation ('good offices') to the parties.

The NCP has at this stage made no determination as to whether the company has acted consistently with the Guidelines. As specific instances are not legal cases and NCPs are not judicial bodies, NCPs cannot impose sanctions, directly provide compensation nor compel parties to participate in a mediation.

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1. Substance of the submission

1. On 12 May 2025, the Norwegian NCP received an individual complaint from a former employee of the Latvian company Orkla Biscuit Production (OBP), a factory under Orkla Snacks AS, concerning sexualized, offensive and humiliating behaviour and communication in the workplace, breach of complaint handling procedures, and potential breach of sanitary production standards.
2. On 4 February 2025, the complainant submitted an official complaint against OBP to its owners, Orkla Snacks and Orkla Eesti. This was shared with OBP, which dismissed all claims. In response, the complainant submitted a second request to the OBP's owners as well as Orkla ASA, who confirmed OBP's conclusion and announced that an internal inquiry would take place.
3. The complainant requests the NCP to encourage Orkla Snacks AS to acknowledge the violations, to ensure effective whistle-blower protection within the company, to promote transparency regarding any hygiene-related breaches and to safeguard consumer interests, and to re-emphasize the company's obligations to maintain safe working conditions.

2. Response from the enterprise

4. In response to the submission, the company provided a detailed explanation of relevant policies and procedures, such as codes of conduct, whistle-blowing mechanisms, staff training programmes and due diligence across Orkla companies, including OBP.
5. Regarding the alleged breaches of the Guidelines related to the working environment, the company refers to a recent employee satisfaction survey in OBP and a.o. retraining of relevant employees on proper communication. The company states that no breaches of hygienic standards in production have been identified in its quality processes or audits.
6. The company concludes that it considers the complaint to be a personnel matter and that no further action from the NCP is warranted.

3. Proceedings by the NCP

7. The complaint was received on 12 May 2025. Following a coordination meeting with NCP Latvia on 11 September it was agreed that NCP Norway be the lead NCP, with NCP Latvia as supporting NCP. On 6 October 2025, the submission was shared with Orkla ASA, who responded on 20 October 2025.
8. The draft Initial Assessment was shared with the parties for comments before being finalised on 21 November 2025 and subsequently published on the NCP's website and submitted to the OECD Database of Specific Instances.

4. Initial assessment by the NCP

9. The NCP considers that the complainant, as a former employee of OBP, has legitimate interests in the matters raised and that there is a clear link between the issues raised and the company.
10. The complaint refers to Chapter II (General Policies – commentary 13), IV (Human Rights), Ch. V (Employment and Industrial Relations – para 1.f) and Ch VII (Consumer interests, para 1) of the Guidelines. The issues raised are material and partially supported by sufficient and credible information.
11. The NCP recalls that the enterprise has in place adequate human rights policies. It has addressed the material issues in the complaint through its own procedures, and that e.g. corrective general workplace environment measures already were implemented by the enterprise. Also, the NCP considers this to be a potential legal dispute between an individual employee and the employer. Thus, the NCP does not consider that a further examination of this Specific Instance would contribute to resolve the issue nor to fulfil the purposes and effectiveness of the Guidelines.

5. Conclusion

The NCP has decided to reject the submission. In making this assessment, the NCP has made no determination as to whether the company has observed the Guidelines.