



National Contact Point  
for Responsible Business  
Conduct | Norway

# NCP Norway

Expert body on responsible business conduct



We raise awareness  
of the OECD Guidelines  
on Responsible Business  
Conduct, handle complaints  
and provide fora for dialogue  
and cooperation.

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## Introduction

# Expert body on responsible business conduct

The National Contact Point for Responsible Business Conduct Norway (NCP Norway) is an expert body that works to raise awareness of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines). A key objective of the Guidelines is to encourage businesses to enhance their contribution to sustainable development. The NCP also handles cases of alleged non-observance of the Guidelines.

The OECD – the Organisation for Economic Co-operation and Development – works to promote policies that improve economic and social welfare all over the world. All governments that adhere to the Guidelines are obliged to establish a national contact point (NCP).



The Guidelines provide guidance in a changing world.

# OECD Guidelines on Responsible Business Conduct

The Guidelines provide recommendations from governments on how companies can act responsibly, wherever in the world they operate.

A total of 52 countries (2025) adhere to the Guidelines – representing a large part of the global economy. Governments have clear expectations that companies operate in line with the Guidelines.

A core component of the Guidelines is the recommendation for enterprises to carry out risk-based due diligence to prevent and address adverse impacts on people, society and the environment.

The Guidelines were introduced in 1976 and are updated regularly to reflect societal changes. In 2011, a separate chapter on human rights was introduced in the Guidelines and in 2023, expectations relating to the management of environmental and climate risks were strengthened.

The Guidelines and due diligence recommendations are the basis for regulations both in Norway and internationally, including the Norwegian Transparency Act and EU sustainability regulations.



## OECD Guidelines

The updated Guidelines (2023) are available on our web pages.



# Key areas of responsible business conduct

The Guidelines provide recommendations in all key areas of relevance to sustainable and responsible business conduct.



Disclosure



Human rights



Employment and industrial relations



Environment



Consumer interests



Science, technology and innovation



Combating bribery and corruption



Taxation



Competition

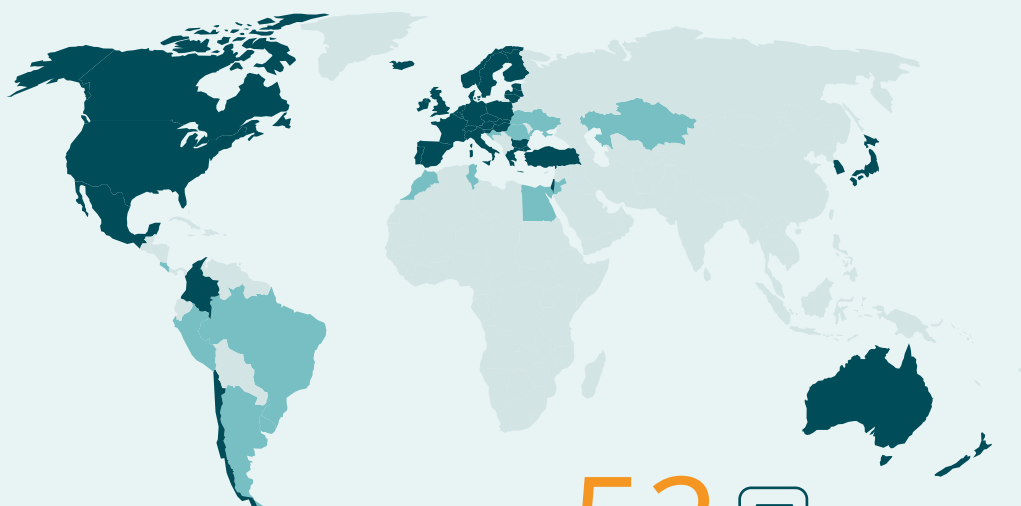
# National Contact Points for Responsible Business Conduct

All countries that adhere to the Guidelines are obliged to establish an NCP. The NCPs are a unique mechanism responsible for:

- raising awareness of the OECD Guidelines on Responsible Business Conduct and OECD Due Diligence Guidance;
- helping resolve cases as a non-judicial grievance mechanism for responsible business conduct.

NCPs may also assist governments in their efforts to develop policies that promote responsible business conduct.

## Countries with National Contact Points



- OECD member countries
- Adhering countries

52 

*The map does not include any consideration of territorial status or sovereignty. 1 June 2025.*

countries adhere to the Guidelines and have established NCPs.



Nordic-Baltic network meeting with NCPs from Denmark, Estonia, Finland, Iceland, Norway and Sweden. The Latvian and Lithuanian NCPs were unable to attend on this occasion. Reykjavik's beautiful Harpa Concert Hall is in the background.

## International cooperation

The OECD Working Party on Responsible Business Conduct (WPRBC) is composed of representatives of all governments adhering to the Guidelines and meets regularly in Paris. The WPRBC's mandate is to support implementation of the Guidelines globally and promote policy coherence. The WPRBC also holds regular consultations with its stakeholders Business at OECD (BIAC), the Trade Union Advisory Committee (TUAC), and OECD Watch.

NCP Norway regularly participates in the network meetings with the other NCPs and the OECD Secretariat. The network meetings

provide an important platform for sharing experiences and good practices across the NCPs. To ensure confidence in the NCP system, it is important that companies are met with the same expectations and equal treatment wherever they operate.

The Nordic-Baltic NCPs hold an additional meeting once per year. The network comprises the NCPs of Estonia, Denmark, Finland, Iceland, Latvia, Lithuania, Norway and Sweden. It is a constructive forum for sharing experiences with case handling and efforts to promote the Guidelines.

# The people in NCP Norway

## NCP Norway – an impartial, expert body

The NCP consists of externally appointed members as well as a secretariat. NCP Norway's members are appointed by the Ministry of Foreign Affairs and the Ministry of Trade, Industry and Fisheries in consultation with the Ministry of Labour and Social Inclusion and the Ministry of Finance. They are appointed based on nominations made by the social partners, the Confederation of Norwegian Enterprise (NHO) and the Norwegian Confederation of Trade

Unions (LO), and civil society represented by the Norwegian Forum for Environment and Development (ForUM).

The secretariat is responsible for the day-to-day work of NCP Norway. This includes efforts to raise awareness of the Guidelines and due diligence, and to prepare handling of specific instances and mediation. NCP Norway's members make the decisions in specific instances (cases).

### NCP Norway members



**Frode Elgesem**  
Chair, Judge at  
Borgarting Court of Appeal



**Liv Tørres**  
International Secretary,  
Norwegian Confederation  
of Trade Unions



**Anita Marie Gilje  
Househam**  
Vice President for Social  
Sustainability, Orkla ASA



**Carin Leffler**  
Senior Advisor,  
Future in our hands

### NCP Norway secretariat



**Kristel Tonstad**  
Policy Director and  
Head of Secretariat



**Per N. Bondevik**  
Senior Advisor



**Åse Sand**  
Senior Advisor





Snapshots  
from the  
NCP's work





# Due diligence – the key to responsible business conduct

Do your business activities have adverse impacts on people, the environment or society? How does it happen? Who is affected? How can you prevent risks or remedy the situation when things go wrong?

A key element of the Guidelines is the expectation that companies carry out risk-based due diligence.

Due diligence entails identifying, preventing, mitigating and accounting for how the company addresses actual and potential adverse impacts that may be associated with their operations, products or services.

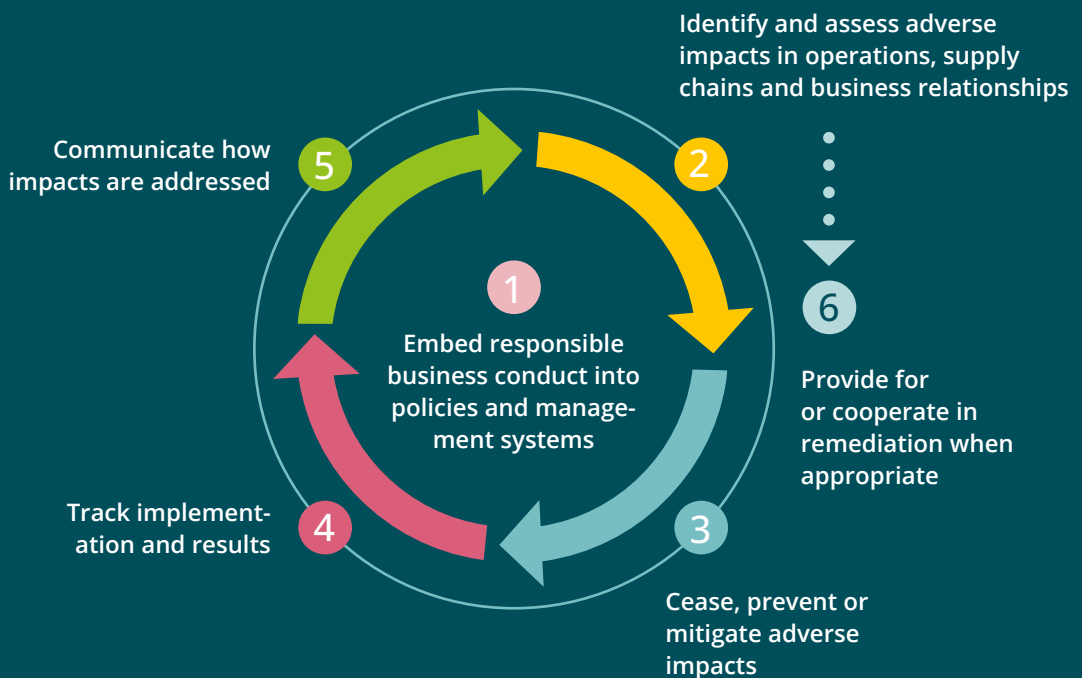
Companies are also expected to remediate adverse impacts on people and the environment that they have caused or contributed to.

For many companies, risk primarily concerns risk to the enterprise itself: their reputation,

financial position or production. However, the issue here concerns the risk of adverse impacts on people and the environment – both within and outside the company. These different types of risks are often linked.

In areas affected by war and conflict, companies should carry out enhanced due diligence. This calls for an assessment of the risk that companies might be contributing to violations of international humanitarian law, as well as an analysis of the actors in the conflict and how the company risks influencing conflict dynamics.

# The OECD due diligence model



The model shows that due diligence is an ongoing process.





NCP Norway and the Consumer Authority hold regular workshops on responsible business conduct and the Transparency Act.

# The Transparency Act obliges

The Transparency Act requires larger enterprises to carry out due diligence in line with the OECD Guidelines.

The Transparency Act, which entered into force in 2022, aims to promote enterprises' respect for fundamental human rights and decent working conditions and to ensure access to information about how enterprises address these matters.

The Transparency Act requires larger enterprises to carry out due diligence in line with the Guidelines when it comes to human rights and decent working conditions. Under the Guidelines, enterprises are also expected

to carry out due diligence when it comes to other areas, including the environment, anti-corruption and technology.

The Consumer Authority is responsible for providing guidance and monitoring compliance with the provisions of the Transparency Act. The Consumer Authority and NCP Norway work together to provide training and guidance for companies in relation to the due diligence and disclosure duties in the Transparency Act.



Dialogue and cooperation with the Consumer Authority and others.

## EU sustainability regulations

A number of EU sustainability regulations require companies to prevent and address adverse impacts of their activities on people and the environment. The regulations build on the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.



Heidi Hautala – former Vice-President of the European Parliament and a driving force behind the EU Corporate Sustainability Due Diligence Directive at a seminar hosted by NCP Norway.

## A unique grievance mechanism

# Dialogue and mediation yield results

The NCP system serves as a resource for organisations and individuals when they believe that a business has failed to observe the OECD Guidelines.

The process is non-judicial and is the only internationally recognised grievance mechanism for responsible business conduct.

NCP Norway provides a unique platform for dialogue and mediation between the parties, assisting them in efforts to find solutions that are in keeping with the Guidelines and that are acceptable to both parties.

NCP Norway handles complaints against companies operating in and from Norway. The process must be impartial, predictable, equitable and in line with the Guidelines. Cases are processed in accordance with the procedures set out in the OECD Guidelines and NCP Norway's case-handling procedures.

The solutions have had positive effects beyond the individual cases by influencing the activities of other companies.



## External mediators

NCP Norway often uses external mediators. The cases are frequently complex, and it can be beneficial to use experienced mediators with expertise on the issues raised.

In some cases, the parties' trust in the process can be enhanced by engaging inter-

national mediators, without national ties to either party, and who have knowledge of the industry that the complaint relates to.

In 2021, the OECD established a roster for professional mediators to assist NCPs across countries.

# How to submit a complaint

Complaints submitted to the NCP must be in writing and should be substantiated. The complaint should include a description of the issue, reference(s) to the relevant section(s) of the Guidelines and an explanation of what the complainant seeks to achieve.

NCP Norway carries out an initial assessment of whether the issue raised warrants further examination by taking the following criteria into account:

- the identity of the party concerned and its interest in the matter;
- whether the issue is material and substantiated;
- whether the enterprise is covered by the Guidelines;
- whether there seems to be a link between the enterprise's activities and the issue raised in the specific instance;
- the extent to which applicable law and/or parallel proceedings limit the NCP's ability to help resolve the issue and/or implement the Guidelines;
- whether an examination of the issue would contribute to the purpose and effectiveness of the Guidelines.

## Database of specific instances

Would you like to know more about specific instances handled internationally? All cases handled by NCPs are logged by the OECD in a public database:



An overview of cases handled by NCP Norway is available on our website.

# Case handling: 5 stages

A complaint is filed



1

## Stage 1: Confirmation and coordination

The NCP confirms receipt of the complaint, coordinates with other NCPs when pertinent, and forwards it to the company named in the complaint, which is then invited to respond.

2

## Stage 2: Initial assessment

The NCP determines whether the complaint warrants further examination.

3

## Stage 3: Dialogue and mediation

The NCP facilitates dialogue and mediation to assist the parties in reaching an agreement. If dialogue and mediation are refused or mediation is not successful, the NCP will examine the case based on the Guidelines.

4

## Stage 4: Final statement

The NCP publishes its final statement. If the parties have reached an agreement, this is usually included in the final statement. If the parties do not reach an agreement, the final statement will include an assessment of whether the company has observed the Guidelines and can include recommendations to the company.

5

## Stage 5: Follow-up

The NCP follows up on the agreement and/or any recommendations in the final statement and issues a follow-up report based on this.

The procedures for handling complaints  
are available on our website in Norwegian,  
English and Sámi.

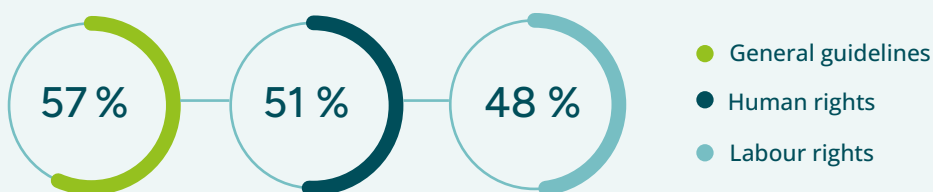




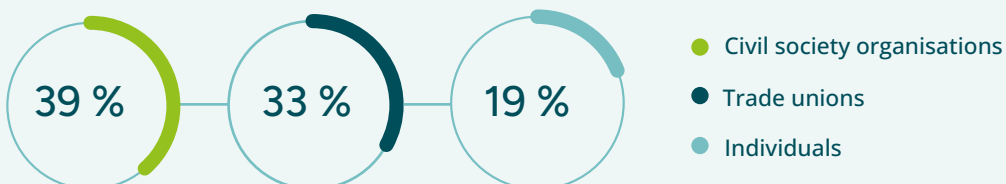
# Cases spanning 25 years

Since the mechanism was established in 2000, NCPs have handled more than 650 cases connected to the activities of companies in more than 100 countries.

**AREAS:** Since 2011, most cases handled by NCPs have been related to:



**COMPLAINANTS:** Since 2011, the majority of complaints have been filed by:



**RESULTS:** Since 2011, 56 % of the cases have resulted in an agreement.



**GROUNDBREAKING CASES:** In connection with the 20th anniversary of the NCP system, NCP Norway published a collection of ten groundbreaking cases. These can be found on our website (Norwegian only).

# Case-handling in practice

Human rights are central in NCP cases, including in Norway.

## Example 1: Due diligence in conflict areas



In December 2019, NCP Norway received a complaint from the Committee Seeking Justice for Alethankyaw (CSJA) – a small group of refugees in Bangladesh.

The complainants believed that Telenor's failure to carry out due diligence led to the military's misuse of a telecommunications tower as a vantage point to kill and displace villagers in the village of Alethankyaw in Rakhine State in Myanmar in August 2017. The tower was owned and operated by one of Telenor Myanmar's network providers. The complaint also raised issues of land use and Telenor's role in a network shutdown in 2019.

The complainants did not wish to engage in dialogue and mediation, and as a result the NCP conducted its own examination and published its final statement. The NCP found no basis to conclude that Telenor caused or contributed to the misuse of the telecommunications tower in August 2017. However, there was a direct link between Telenor's operations and the adverse impacts through a business relationship.

The NCP assessed that, at the time, it was not reasonable to expect the company to foresee the risk of the telecommunications tower being misused. However, this is now a known risk that must be identified and mitigated in Myanmar and other high-risk contexts.

The OECD Guidelines recommend enhanced due diligence in conflict areas. In a context like Myanmar, the Guidelines call for a risk assessment of cooperation with the military and stakeholder engagement with the most vulnerable groups – in this case, the Rohingya.



TELENOR SHOP: Customers queue to buy SIM cards from a Telenor shop in Yangon, Myanmar, 26 October 2014. (Photo: Khin Maung Win/AP/NTB)

## Example 2: Worker compensation



In December 2015, three individuals filed a complaint with the Dutch NCP against Heineken and its Congolese subsidiary Bralima.

Heineken was accused of the unlawful dismissal of 168 employees during the civil war in the DRC between 1999 and 2003 and of failing to use its leverage to protect the former employees.

The Dutch NCP facilitated mediation in 2016, and an external mediator led the meetings held in Uganda and France. The parties reached an agreement in 2017.

Heineken and Bralima committed, among other things, to developing guidelines for operations in conflict areas and to improving their internal processes in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights. The agreement also included financial compensation for the dismissed employees.

In the follow-up evaluation in 2021, the NCP expressed satisfaction with the implementation of the agreement.

## Example 3: Consultations with indigenous groups



The complaint from the Jijnjevaerie Sámi village against Statkraft AS concerned a planned wind farm project in Jämtland, Sweden, where the Sámi people pursue traditional reindeer husbandry.

The Sámi village claimed that the consultations carried out by Statkraft AS were inadequate and that the project was against their will. They claimed that the project would limit their ability to continue sustainable reindeer herding. Several aspects of the case had already been handled in the Swedish legal system.

The case was handled by the Norwegian and Swedish NCPs, which facilitated mediation in June 2014. The mediation did not lead to an agreement. The NCPs did not find grounds for concluding that Statkraft AS had failed to observe the Guidelines, but identified areas with room for improvement.

In July 2016, the parties reached a long-term agreement on their own. The agreement provided for compensation to the Sámi village for improvement measures to regulate the impact of the wind farms, and access to the land for the operational phase of the wind farms.

# Need guidance? We have the tools!



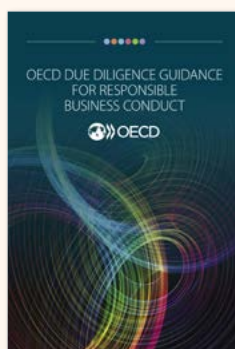
A number of actors assist Norwegian companies when it comes to due diligence. As an expert body for responsible business conduct and due diligence, NCP Norway knows what is required.

Join our seminars and workshops, try our digital tools or send us a request to give a presentation.

1

## Guidance

The OECD Due Diligence Guidance for Responsible Business Conduct (2018) provides practical advice to companies on how to carry out due diligence. NCP Norway has prepared an introductory version of the Guidance (Norwegian only).



2

## Corporate responsibility to respect human rights – examples

The Norwegian Human Rights Institution (NIM) and NCP Norway have developed a table with examples to make it easier to understand how companies can be involved in adverse human rights impacts (Norwegian only).



3

## Responsible Business Conduct Compass

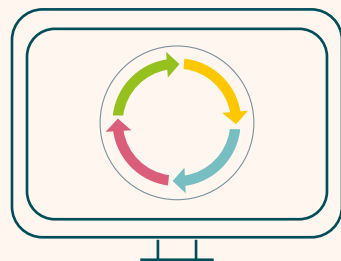
NCP Norway has developed the Responsible Business Conduct Compass – a simple and user-friendly tool that helps companies to assess the extent to which they observe the Guidelines and to identify goals and measures.



4

## Self-assessment of due diligence

On our website, you will find a six-step digital self-assessment tool for your company's work on due diligence (Norwegian only).



5

## Dilemma collection

Risk management often poses challenging dilemmas. The examples of dilemmas put together by the Confederation of Norwegian Enterprise (NHO), Transparency International Norway and NCP Norway aim to inspire reflection and discussion around 22 dilemmas related to human rights, decent work and anti-corruption (Norwegian only).



All the tools are available on NCP Norway's website:  
[Responsiblebusiness.no](https://Responsiblebusiness.no)

## 6 Sectoral guidance

The OECD sectoral guidance documents provide concrete and practical advice on responsible business conduct and due diligence, including what can be done to strengthen responsible business conduct in supply chains.

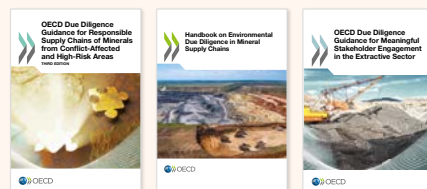
### Financial sector

The OECD has guidance for institutional investors, corporate lending, project and asset-based finance transactions, and managing climate risks.



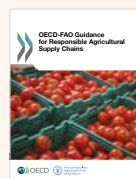
### Extractive and minerals sector

The guidance for the extractive and minerals sector focuses on conflict-affected and high-risk areas, and stakeholder engagement. The OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector has been translated into Norwegian and Sámi. The OECD has also published a Handbook on Environmental Due Diligence in Mineral Supply Chains.



### Agriculture and food sector

The OECD and the Food and Agriculture Organization of the United Nations (FAO) have jointly developed the OECD-FAO Guidance for Responsible Agricultural Supply Chains.



### Garment and footwear sector

The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector provides advice to companies on how to prevent and mitigate adverse impacts on human rights and the environment in their supply chains. It has been translated into Norwegian and is also available in an introductory version.



The OECD has publications on a number of relevant topics on responsible business conduct.



Building more resilient and sustainable global value chains through responsible business conduct



Integrating responsible business conduct in public procurement

Practical actions for companies to identify and address the worst forms of child labour in mineral supply chains and a report on traceability in critical mineral supply chains

Digitalisation and responsible business conduct



Handbook on due diligence for enabling living incomes and living wages in agriculture, garment and footwear supply chains and a paper on the role of sustainability certifications in the garment and footwear sector



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