

National Contact Point for Responsible Business Conduct Peer Reviews

Norway 2026



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Foreword

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognised standards. The Guidelines are the only multilaterally agreed and comprehensive code of responsible business conduct that governments have committed to promoting.

Adhering governments to the Guidelines are required to set up a National Contact Point for Responsible Business Conduct (NCP) that operates in a manner that is visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the Guidelines. The 2023 update of the Guidelines reinforced peer reviews of NCPs by making them mandatory and periodic, subject to the Modalities for Peer Reviews of National Contact Points for Responsible Business Conduct, approved by the Working Party on Responsible Business Conduct (WPRBC).

The peer reviews are led by representatives of two other NCPs who assess the NCP under review and provide recommendations. The reviews give NCPs a mapping of their strengths and accomplishments, while also identifying opportunities for improvement, including a structured assessment of how the NCP addresses the core effectiveness criteria. More information can be found online at <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/national-contact-point-peer-reviews.html>.

This document is the peer review report of the NCP of Norway. This report was prepared by a peer review team made up of reviewers from the NCPs of Luxembourg and the United States, and with the support of the OECD Secretariat. The NCP of Luxembourg was represented by Başak Bağlayan. The NCP of the United States was represented by Aarshika Shrestha. The OECD Centre for Responsible Business Conduct was represented by Nicolas Hachez and Santhosh Persaud. The report was informed by dialogue between the peer review team, the NCP of Norway and relevant stakeholders during an in-person mission on 23-25 September 2025. The peer review team wishes to acknowledge the NCP for the preparation of the peer review. This report also benefited from comments by delegates to the WPRBC and institutional stakeholders (BIAC, OECD Watch, TUAC). It was discussed by an informal review group of the WPRBC on 2 December 2025 and approved and declassified by the WPRBC on 24 December 2025.

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1 Key findings and recommendations

Institutional arrangements

The Norwegian NCP has an expert-based structure. Its current structure was adopted through a revised mandate in 2011, following a consultative review process. The mandate of the NCP was last revised in 2022 and is set out in a ministerial document co-ordinated across four ministries, the MFA, the Ministry of Trade, Industry and Fisheries (MTIF), the Ministry of Finance (MoF) and the Ministry of Labour and Social Inclusion (MLSI). Four independent experts are appointed by the government, the chair is identified by the government and other experts' appointments are based on proposals by businesses, trade unions and civil society. A Secretariat of three full-time staff with strong expertise in RBC leads on promotional activities and supports case handling. The Secretariat is located in the Ministry of Foreign Affairs (MFA). The NCP's structure, impartiality and expertise are viewed very positively by stakeholders.

The NCP does not have a formal oversight body but reports annually to the mandate-giving ministries mentioned above. Several ministries of relevance to the NCP are not formally involved in its work, notably the Ministry of Children and Families that oversees Norway's due diligence legislation, the Transparency Act. Stakeholders describe the Act as a game changer for the NCP's work. The NCP suggested that an update of its mandate would be needed in light of the 2023 update of the OECD Guidelines, notably to reflect its role in supporting policies on RBC. The NCP does not have an advisory body and could further intensify its engagement with stakeholders from businesses, trade unions and civil society. The NCP publishes information on its institutional arrangements very transparently, with the exception of processes for decision making.

Sufficient levels of human and financial resources have allowed the NCP to deliver on its mandate to date, but risk being insufficient to meet growing demand. The NCP already needs to manage trade-offs between specific instances on the one hand and promotional activities and support to policy efforts on the other due to resource constraints. Demand and opportunities for the NCP's engagement on RBC is strongly growing, notably owing to the Transparency Act and the resulting dynamic. Stakeholders recognise a need for additional human and financial resources, which could be bolstered by greater efforts to make the most out of existing resources.

Table 1. Findings and recommendations – Institutional arrangements

	Finding	Recommendation
1.1	The NCP's model of independent experts and Secretariat placed in the Ministry of Foreign Affairs is valued by all stakeholders for its effectiveness, representation of stakeholder constituencies and independence. There is a high level of trust in the NCP and its impartiality, and it is strongly recognised for its expertise. The mandate lacks legal status, which diminishes the NCP's visibility. It does not include a general role for the NCP in supporting the development and implementation of policies related to RBC. The suggestion to move the leadership for the NCP and its Secretariat to the Ministry of Trade, Industry and Fisheries (MTIF) raises concerns with stakeholders, notably regarding the NCP's perception of impartiality.	The government should update the mandate of the NCP, taking the following considerations into account: <ul style="list-style-type: none"> Recognising the role of the NCP to support government policy efforts on RBC and defining how it should collaborate with relevant ministries and government agencies. Broadening the anchoring of the NCP with additional ministries that are active on RBC related policies. Strengthening the visibility of the NCP, for example by giving the mandate a legal status or adopting it at a higher level.

	Finding	Recommendation
		<ul style="list-style-type: none"> Consulting stakeholders and the NCP on any reflections to change the institutional arrangements of the NCP to ensure stakeholder trust and perception of impartiality. Ensuring that the NCP makes its decision making processes clear and transparent.
1.2	The NCP enjoys a level of human and financial resources that allows it to handle several cases while delivering a substantive range of promotional activities and advise on RBC-related policy. However, resources are not adequate to meet growing demand, in particular due to the Transparency Act and other legislation, increasingly complex cases and expectations for engagement in public debate. Delays in recruitments and appointments are further sources of constraint.	The NCP and the government should explore mobilising additional human and financial resources for the NCP and its Secretariat to meet needs of both capacity and skills, and make more out of existing resources, by reducing recruitment and appointment delays and prioritising activities based on the NCP's added value.
1.3	The NCP does not have an advisory body. It engages with stakeholders through annual meetings, ad hoc collaborations and NCP members' exchange with their respective constituencies.	The NCP should ensure more systematic engagement with stakeholders, for example through consultations on any decision affecting its functioning (e.g. case-handling procedures) and more frequent meetings that allow for the exchange with and across stakeholder groups on issues such as the promotion of RBC and engagement on RBC-related policies.

Promotional activities

The NCP delivers a broad range of promotional activities, which are highly appreciated by stakeholders. It (co-)organises numerous events and provides trainings on RBC together with the Consumer Authority, who is responsible for advising on and monitoring compliance with the Transparency Act. The NCP has developed various information materials, such as a collection of dilemmas on human rights and anti-corruption, and tools to support enterprises in conducting risk-based due diligence, such as the RBC Compass, which allows companies to assess their performance against the OECD Guidelines. The NCP's website presents information on the work of the NCP and materials in a clear manner. Specific instances are increasingly covered by large-scale Norwegian media, incentivising the NCP to be more present in public debate.

To make the most out of its resources, the NCP's promotional activities need to be guided by greater consideration for the NCP's comparative advantage within the Norwegian stakeholder landscape. Numerous stakeholders engage in the promotion of RBC in Norway. The NCP collaborates with many on ad hoc basis but could co-ordinate better with other actors on the overall promotion strategy in light of respective comparative advantages. Involving stakeholders in more long-term planning of activities could enable synergies and leverage the NCP's deep expertise on the OECD Guidelines and role as a public body with anchoring in the MFA. A regular business survey commissioned by the NCP highlights limited awareness of RBC, the OECD Guidelines and the NCP among the business community in Norway. In planning its activities, the NCP would also gain from a better sense of the results of its prior efforts. Stakeholders highlight the need for further promotional efforts, notably to reach actors beyond their regular audience and provide practical guidance on challenges that businesses encounter.

Table 2. Findings and recommendations – Promotional Activities

	Finding	Recommendation
2.1	The NCP has developed promotional material and tools of great depth, breadth and quality in strong collaboration with a broad range of stakeholders, responding to stakeholder needs and opportunities from political developments. While many stakeholders engage in similar activities, the NCP could co-ordinate better with other actors on the overall promotion strategy in light of respective comparative advantages. A business survey on RBC is good practice to track RBC practice but the NCP does not monitor the more immediate results of its promotional activities.	The NCP should plan promotional activities strategically in consultation with other stakeholders, define priorities based on its added value and comparative advantage, notably its deep expertise on RBC and public mandate, set objectives and track results.

Specific instances

The NCP has received 24 specific instances in total, 18 of which since 2011. Fourteen specific instances have been concluded, one of which is currently undergoing follow-up, while six were not accepted, and four are ongoing.¹ In addition, the NCP rejects some submissions prior to an initial assessment.

The Norwegian NCP updated its case-handling procedures in 2025, which are accessible on its website in both Norwegian and English. Comprehensively covering all steps of the process, the new procedures contain more detail on the NCP's good offices and follow-up procedures and include information on risks of reprisals. To further strengthen the NCP's transparency, information on the NCP's practice in managing admissibility prior to the initial assessment as well as conflicts of interest could be included. Additionally, more clarity would be useful both on the effects of Freedom of Information Act on the NCP's case-handling and the Consumer Authority's ability to pursue violations of the Transparency Act regarding cases before the NCP.

As part of its good offices, the NCP frequently contracts external mediators. Due to cost and time implications, it is exploring mediation by NCP members or Secretariat staff as an alternative. The NCP has delivered comprehensive final statements in several instances where mediation was not successful. Stakeholders provide positive feedback on the NCP's case handling, notably its transparency and impartiality. However, timeliness is an important concern, with several specific instances substantially exceeding foreseen timelines. The NCP is already exploring different options to address this.

Table 3. Findings and recommendations – Specific instances

	Finding	Recommendation
3.1	The NCP has been very effective in managing increasingly complex cases through both mediation and detailed examination and clear final statements. Stakeholders provide highly positive feedback to the NCP's case-handling and value its impartiality, transparency and independence. The NCP mobilises substantial resources for case-handling and enhancing accessibility for complainants. However, lengthy proceedings are a concern both for parties and the NCP, contributing also to the NCP's resource constraints.	The NCP should improve timeliness of case handling, by <ul style="list-style-type: none"> • pursuing current efforts to set and enforce clear timelines for good offices and stepping in where appropriate • imposing limits on the length of written inputs by parties • adapting the depth of initial statements and offer of good offices to the complexity of the case at hand • exploring whether certain cases could – with agreement of the parties – first be dealt with by grievance mechanisms at company level.
3.2	Updated case-handling procedures provide for greater clarity on good offices and more systematic follow-up. The procedures do not provide easily accessible information on the management of conflict of interest although internal practice is well established pursuant to the Public Administration Act. The NCP has also rejected some clearly out of scope cases without conducting an initial assessment but does not have an established procedure to do so.	The NCP should strengthen transparency and communication on its case handling by clarifying its approach to admissibility of cases in a way that does not impede accessibility, and setting out how it manages conflicts of interests.
3.3	The Consumer Authority can assess alleged violations of obligations under the Transparency Act, issue decisions as well as penalties for enforcement. As the Transparency Act references the OECD Guidelines and the NCP collaborates closely with the Consumer Authority, this can create confusion for potential parties to specific instances. Additionally, as the NCP is subject to the Freedom of Information Act, this raises questions regarding protection of confidential information submitted into the specific instance process.	The NCP should engage with the relevant authorities to clarify the potential interaction with cases before the Consumer Authority, and its ability to ensure confidentiality under obligations under the Freedom of Information Act, and communicate transparently about this.

Support for government efforts to promote RBC

A number of Norwegian regulatory and policy frameworks enable and promote RBC. First and foremost, the Transparency Act created a legal obligation to carry out and account for risk-based due diligence. It is complemented by the transposition of other European Union legislation related to RBC. The government

and related agencies also set RBC-related expectations in frameworks for public procurement, export credits, trade and investment promotion, as well as state ownership and the management of Norway's sovereign wealth fund. Cross-government co-ordination mechanisms for RBC could be more active and provide an avenue to draw on the NCP's advice on policy coherence.

The NCP has contributed to many of these legislative and policy processes on RBC. In particular, it has been actively involved in the development, implementation and review of the Transparency Act. The NCP regularly engages with and provides advice to government and agencies and collaborates with them in promotional activities. There have also been several specific instances involving state-owned enterprises that have contributed to better RBC practices. However, the NCP is not systematically consulted by ministries. Its mandate does not cover support to RBC-related policy efforts and misperceptions about its role further affect the NCP's ability to provide advice. To the extent they are aware, government agencies consider specific instances in their own engagement with Norwegian enterprises.

Table 4. Findings and recommendations – Support for government efforts to promote RBC

	Finding	Recommendation
4.1	The NCP has been able to contribute to a range of regulatory and policymaking processes. Ministries draw on the NCP's advice on an ad hoc basis, and in some cases consult the NCP through mechanisms for civil society consultation, or not at all. Co-ordination mechanisms are not fully functional, impeding the NCP's role in fostering policy coherence.	Ministries should more systematically draw on the expertise of the NCP in their RBC-related policy initiatives and consider including the NCP in mechanisms for cross-government dialogue and co-ordination on RBC, as appropriate.
4.2	The NCP has good relations and collaborates with a number of ministries and governments, both for promotional activities and the design and implementation of public policies. However, this does not involve the full range of relevant institutions.	The NCP should continue to regularly engage with other relevant government departments (e.g. by communicating final statements to both ministries and government agencies for consideration in their respective areas of work; organising regular briefings on its work).

2 Structured assessment of core effectiveness criteria

As provided for in the Modalities for Peer Reviews of NCPs, the following table provides a structured assessment of the extent to which the NCP under review achieves the core effectiveness criteria as set out in the Implementation Procedures of the Guidelines. The findings in the table work to inform the report's recommendations and provide an overview of the NCP's functioning and areas for improvement

Table 5. Structured assessment of core effectiveness criteria

	Visibility	Accessibility	Transparency	Accountability	Impartiality and equitability	Predictability	Compatibility
Institutional arrangements	The Transparency Act boosts the NCP's visibility, while its mandate without legal status and independent expert structure do not enhance visibility.	The NCP is connected to stakeholders through its members. Stakeholder engagement could be strengthened beyond annual meetings and ad hoc partnerships.	Mandate, workplan, activity reports and meeting summaries are publicly available. Information on decision making is not public.	The NCP reports annually on progress against its workplan to ministries and shares plans for the next year with them.	The stakeholder-based independent structure with Secretariat in the MFA ensures impartiality.	The mandate, case-handling and applicable procedures are clear on the functioning of the NCP with the exception of decision making.	The structure enables stakeholder confidence and expertise. Resources are substantial but not adequate for growing demand.
Promotion	Activities have a good reach, but demand exceeds the NCP's capacity. Planning could be more strategic.	Promotional materials are free and available on the website. The NCP is very accessible for collaboration and enquiries.	Workplan, promotional material, tools, events, and business survey are published online.	Business survey and training feedback inform promotion. However, the NCP does not monitor the impact of its activities.	Focusing on businesses, the NCP offers activities for and in collaboration with diverse stakeholders.	The NCP announces promotional activities in advance.	The NCP's promotion meets the expectations of the Guidelines.
Specific instances	Some cases have been covered by mainstream media. The NCP itself uses specific instances to communicate.	No onerous filing or acceptance requirements. Decision making and the approach to admissibility in some cases could be clarified.	All information is systematically published, except for cases found inadmissible.	Parties are invited to provide feedback on the NCP's handling of the specific instance.	The NCP advises and supports parties in an equitable manner. It is perceived as very impartial, and impartiality is enabled by strong conflicts of interest policy.	The NCP usually does not meet indicative timelines. Updated procedures provide greater clarity.	Procedures and practice for case-handling are largely aligned with the Procedures.
Conclusion	Strengthen	Maintain	Strengthen	Maintain	Maintain	Strengthen	Maintain

Note: Light grey boxes correspond to areas where the NCP should maintain practice, medium grey boxes correspond to areas where the NCP should strengthen practice, and dark grey boxes correspond to areas where the NCP should prioritise improvements to current practice. Conclusions reflect the overall level of achievement of effectiveness criteria across all three areas.

3 Introduction

Box 1. The Norwegian NCP at a glance

Established: 2001

Structure: Expert-based, no advisory body

Location: The Secretariat of the NCP is hosted by the Ministry of Foreign Affairs, Department for Global Affairs

Staffing: Four appointed experts, three full-time staff in the NCP Secretariat

Webpage: <https://www.responsiblebusiness.no/> (Norwegian), <https://www.responsiblebusiness.no/en/> (English)

Specific instances: Total: 24, Concluded: 14; Not Accepted: 6, Ongoing: 4¹.

Norway adhered to the OECD Declaration on International Investment and Multinational Enterprises (Investment Declaration) in 1976 (OECD, 2023^[1]). The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are part of the Investment Declaration (OECD, 2023^[2]). The Guidelines are recommendations on responsible business conduct (RBC) addressed by governments to multinational enterprises operating in or from Adherents. The Guidelines have been updated six times since 1976; the most recent revision took place in 2023.

Countries that adhere to the Investment Declaration are required to establish National Contact Points for Responsible Business Conduct (NCPs). NCPs are set up to further the effectiveness of the Guidelines and Adherents are required to make human and financial resources available to their NCPs so they can effectively fulfil their responsibilities in a way that fully meets the core effectiveness criteria, taking into account internal budget capacity and practices (OECD, 2023^[3]).

NCPs are agencies established by adhering governments to “promote the Guidelines and act as a forum for discussion of all matters relating to the Guidelines” (OECD, 2023^[2]). The OECD Council Decision on the Guidelines states that “NCPs shall have the following responsibilities:

- a) Promote awareness and uptake of the Guidelines, including by responding to enquiries;
- b) Contribute to the resolution of issues that arise in relation to the implementation of the Guidelines in specific instances.

In addition, where appropriate and in coordination with relevant government agencies, NCPs may also provide support to efforts by their government to develop, implement, and foster coherence of policies to promote responsible business conduct” (OECD, 2023^[3]).

The Implementation Procedures of the Guidelines cover the role and functions of NCPs in six parts: institutional arrangements, information and promotion, specific instances, support for government efforts to promote responsible business conduct, reporting, and peer reviews. The Procedures require NCPs to operate in a manner that is visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the Guidelines.

This report assesses conformity of the Norwegian NCP with the core effectiveness criteria of NCPs and with the Implementation Procedures. A structured assessment of the core effectiveness criteria is provided as part of the peer review process (see Structured assessment of core effectiveness criteria).

From 2009-2024, NCPs underwent voluntary peer reviews. The methodology for the peer reviews was the OECD Core Template for Voluntary Peer Reviews of NCPs (OECD, 2021^[4]). In 2017, at the OECD Ministerial Council Meeting (MCM), ministers committed “to having fully functioning and adequately resourced National Contact Points, and to undertake a peer learning, capacity building exercise or a peer review by 2021, with the aim of having all countries peer reviewed by 2023.”² In 2023, the Procedures were updated. In particular, a new part on peer reviews was added providing for periodic mandatory peer reviews of NCPs. Mandatory peer reviews follow a cycle of seven years, with each NCP set to undergo a peer review in each cycle, starting in 2025. “Modalities for Peer Reviews of National Contact Points for Responsible Business Conduct” (the Modalities) for these peer reviews were adopted in November 2024 (OECD, 2025^[5]).

The objectives of peer reviews as set out in the Modalities and the Commentary (para. 23) are to evaluate the strengths and weaknesses of the NCP in accordance with its responsibilities and the core effectiveness criteria set out in the Procedures; and to make recommendations for improvement.

The peer review of the Norwegian NCP was conducted by a peer review team made up of reviewers from the NCPs of Luxembourg and the United States of America, along with representatives of the OECD Secretariat. The peer review included an on-site visit which took place on 23-25 September 2025. The information in this report is current as of 23 September 2025. This visit included interviews with the NCP, other relevant government representatives and stakeholders. A list of organisations that participated in the on-site visit is set out in Annex B.

This report was prepared based on information provided by the NCP and in particular, its responses to the NCP questionnaire set out in the Modalities for Peer Reviews as well as responses to requests for additional information. The report also draws on information provided during the on-site visit as well as responses to the stakeholder questionnaire and NCP Network questionnaire, which were completed by 16 organisations representing business, trade union, government and civil society, and nine other NCPs, respectively (see Annex A for a complete list of stakeholders who submitted written feedback).

The peer review team wishes to acknowledge the NCP for the preparation of the peer review and in particular the on-site visit, the information shared and constructive dialogue throughout the peer review. The team also highly welcomes the very valuable contributions from a wide range of stakeholders and parties to specific instances both through their written feedback and open exchange during the on-site visit. The peer review team also wishes to congratulate the Norwegian NCP for organising a high-quality promotional event in the margins of the peer review.

2014 Peer Review of the Norwegian NCP

The Norwegian NCP underwent a voluntary peer review in 2013-2014. The peer review team consisted of representatives of the NCPs of Canada, Colombia, the Netherlands, Belgium, the United Kingdom as well as Hungary and Mexico as observers, and was assisted by the OECD Secretariat and a consultancy (Norway Peer Review Delegation, 2014^[6]).

The peer review examined the promotion of the OECD Guidelines, the implementation of the Guidelines in specific instances, and the co-operation with other NCPs. It also considered the changes in the institutional set-up of the NCP operated in 2011.

The peer review found that the NCP is “highly effective at fulfilling its mandate pursuant to the Guidelines”. It made seven recommendations for further improvement, summarised as follows:

- On promotion:
 - Develop a specific promotional strategy to combine efforts with responsible ministries.
 - Enhance strategic communication, e.g. by communicating around specific instances, raising awareness of the NCP’s role in resolving cases and partnering with networks.
 - Seek to dedicate adequate resources (human and financial) for promotion, independent of the management of specific instances.
- On specific instances:
 - Increase focus on follow-up to specific instances, e.g. by developing guidance.
 - Develop relationships with NCPs in countries where Norwegian businesses have significant presence.
 - Continuously seek opportunities for dialogue and conflict resolution and explore how this can be strengthened in case-handling procedures.
- On co-operation with other NCPs:
 - Continue to support the peer learning of NCPs.

Economic context

The most important sector of the Norwegian economy is the fossil fuel industry. It accounted for 60% of exports of goods in 2023, while exported services are focussed on sea and coastal water transport (OECD, 2024^[7]). The most important partner countries for exports in 2023 were Nordic and European partners, receiving more than 60% of Norway’s exports of goods and services (OECD, 2024^[7]). The most important source countries for imports of goods in 2024 were China, Sweden, Germany, the United States, and the United Kingdom (Statistics Norway, 2025^[8]).

From 2020 to 2023, foreign direct investment (FDI) inflows in Norway on average amounted to 0.8% of GDP (OECD, 2024^[7]). The stock of FDI in Norway amounted to around USD 176 billion in 2023 or 36% of GDP, outward FDI to USD 251 billion or 52% of GDP (OECD, 2024^[9]). Most important source and destination countries for FDI to and from Norway are from Europe and North America (Statistics Norway, n.d.^[10]). The main sectors for Norway’s FDI in 2023 were mining, manufacturing and second homes, while FDI to Norway was mostly directed to the financial sector, manufacture and mining (Statistics Norway, n.d.^[10]).

4 Institutional arrangements

Legal basis

Norway adhered to the OECD Investment Declaration in 1976, and the Norwegian NCP was formally established in 2001. The NCP is not established through a separate legal instrument but through a document adopted by the Ministry of Foreign Affairs (MFA), in collaboration with the Ministry of Trade, Industry and Fisheries (MTIF), the Ministry of Finance (MoF) and the Ministry of Labour and Social Inclusion (MLSI) (Ministry of Foreign Affairs, 2022^[11]). Other ministries of high relevance to the NCP's work such as the Ministry of Children and Families, the Ministry of Climate and Environment and the Ministry of Justice have so far not been involved in establishing the mandate for the NCP. The mandate was revised in 2011 to reform the structure of the NCP, following information of the parliament about such a plan by the government. The mandate was last revised in 2022 and is available in Norwegian on the NCP's website. The NCP has proposed a review of its mandate to the Ministry of Foreign Affairs in September 2024, to strengthen its capacity and take into account the 2023 update to the OECD Guidelines with regard to support for RBC-related policies (see Support for government policies to promote RBC). An update would be an opportunity to review the mandate's legal status and adopt it at high level, which could both strengthen the NCP's visibility and position as a public body. An update could also allow expanding the range of ministries consulted in the process.

The Transparency Act is of major relevance to the work of the NCP (see Promotion and Support for government policies to promote RBC). The Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) was adopted in 2021 and entered into force in July 2022. It created an obligation for larger enterprises offering goods or services in Norway to conduct due diligence in line with the OECD Guidelines and to account for their due diligence. The due diligence duty follows the six steps of the OECD Due Diligence Guidance (OECD, 2018^[12]). It also creates a right to information vis-à-vis enterprises on their efforts to address actual and potential adverse human rights and decent work impacts. Responsibility for the Transparency Act lies with the Ministry of Children and Families, and Norway's Consumer Authority is tasked with monitoring compliance with the act. Demand for information on RBC and support from the NCP has very substantially increased with the Act being described as a "game changer" for the NCP's work.

NCP Structure

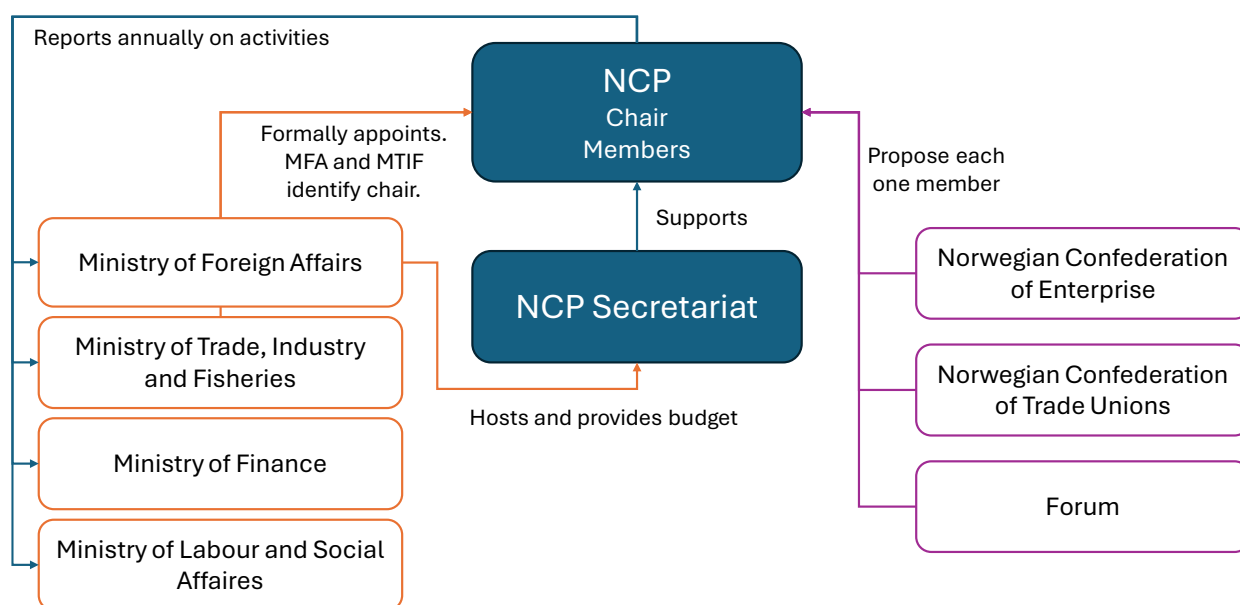
The NCP has an expert-based structure. The NCP members are four independent experts, appointed by the Ministry of Foreign Affairs on proposal of different institutions: MFA jointly with MTIF; the Confederation of Norwegian Enterprise (NHO) for businesses, the Norwegian Confederation of Trade Unions (LO) for trade unions and the Forum for Development and the Environment (ForUM) for civil society. These institutions propose one candidate each. Members are formally appointed by the MFA. One member serves as chairperson, currently the candidate nominated by MFA/MTIF. There is no requirement that members of the NCP stem from or formally represent a specific constituency, and though Chairpersons are identified and appointed by the government, they need not be (and in practice have not been) members of the government administration. Nominating entities each represent a large share but not the full range

of Norwegian businesses, trade unions and civil society respectively. Consultation with other parts of their constituencies on nominations could further strengthen the NCP's visibility and stakeholder confidence.

The NCP is supported by a Secretariat located in the MFA and composed of one policy director as Head of the Secretariat and two senior advisors at present. The NCP does not have an advisory body or a formal oversight body. However, as its mandate is given to it by the government, the NCP reports on its activities to the four ministries MFA, MTIF, MoF and MLSI (see Figure 1).

The NCP's structure underwent substantial revision in 2011. This followed a consultative process and approval by Norwegian Parliament of the new institutional set-up. The main objective of the reform was to strengthen the independence of the NCP, perceived as not sufficiently removed from government in a context where state-owned enterprises have a very strong role in the economy (Norwegian NCP, 2013^[13]). The expert-based structure therefore replaced the original tripartite structure. The 2014 NCP peer review highlighted the highly positive stakeholder feedback to the reform, increased sense of ownership and perception of an improved performance (Norway Peer Review Delegation, 2014^[6]).

Figure 1. Structure of Norway's National Contact Point



Source: Based on the NCP mandate and information provided by the NCP.

Stakeholders from all constituencies continue to view the NCP's structure as pertinent. They highlight that the structure supports the NCP's independence, its credibility and balance in the representation of stakeholders. As positive enabling factors, they underline the high trust Norwegians place in their institutions in general, and a strong culture of constructive social dialogue between employers' and workers' organisations.

Stakeholders generally consider the NCP to be approachable and take into account the views of stakeholders. They highlight three aspects in this regard: i) the role of key stakeholder constituencies in nominating experts on the NCP, ii) the annual meetings with stakeholders to discuss current work; and iii) the accessibility and ease of collaboration with the NCP in promotional activities. To allow for more in-depth discussion, the NCP recently decided to organise annual meetings separately with each constituency. A civil society stakeholder recommended that Norway's NCP create an advisory body to strengthen consultation with stakeholder groups. Instead of a formal body (with implications for administrative proceedings and a related workload), the NCP considers that additional exchanges could

be more efficient. Multi-stakeholder dialogue could also be particularly valuable regarding promotional activities by the NCP and other stakeholders (see below).

Efforts to streamline the MFA's focus areas and administration have sparked reflections within the MFA to shift the administrative responsibility for the NCP and the NCP Secretariat to the MTIF, who since 2019 is leading on Norway's engagement in the OECD Working Party on RBC (WPRBC). The NCP and several stakeholders voice concern that this could negatively affect perceptions of impartiality, as MTIF is also leading on Norway's state-ownership policy and represents the state as shareholder in fully-owned SOEs, while a number of specific instances before the NCP have concerned state-owned enterprises. Such a perception could be even stronger among Norway's indigenous population. Stakeholders also highlight the advantage of the MFA's visibility and the role of embassies in promoting Norwegian businesses abroad. The majority of stakeholders therefore would prefer for the NCP Secretariat to remain within the MFA. On the other hand, one organisation representing businesses stakeholders considers the NCP could be strengthened by increasing its proximity with a ministry with private sector expertise. Regardless of their perspective on the NCP's institutional home, all stakeholders underline that any change should not come at the expense of the NCP's functioning. To adequately reflect concerns, advantages and disadvantages, it would therefore be important to consult both NCP and stakeholders, should any changes in the institutional arrangement for the NCP be considered.

Composition

The current chair of the NCP is a judge, while other members have their current positions with the private sector, LO (the Norwegian Confederation of Trade Unions) and civil society (Norwegian NCP, 2025^[14]). The chair of the NCP is appointed for four years, other members for three years, each renewable once (Ministry of Foreign Affairs, 2022^[11]). In 2024, two new members proposed by the business and trade union constituencies joined the NCP, and in 2025, a member proposed by civil society.

NCP members are RBC experts. While the mandate does not require particular qualifications of NCP members, each of the four members has significant background in the area of RBC and/or human rights and sustainability. Members continue their full-time employment in their current positions, which can be a constraint for their availability to work on NCP matters. While their nominations connect them to a stakeholder constituency, NCP members are independent and do not represent the constituency that nominated them. Nonetheless, NCP members seize opportunities from their work to promote visibility of the NCP and dialogue on the NCP's work with their respective constituency. Prior to taking their position, they need to sign a declaration of confidentiality and impartiality, and the case handling procedures underline that impartiality provisions of the Norwegian Public Administration Act apply to the NCP (see Impartiality and avoidance of conflict of interest in handling specific instances).

Secretariat staff are experts in RBC. The NCP now has three full-time staff members (Norwegian NCP, 2025^[15]). The Head of the Secretariat was hired as policy director in 2021 and was formerly a career diplomat. One staff member was recruited externally in 2024, and another had been on leave to work at Ethical Trade Norway, being temporarily replaced with a staff member on leave from the Consumer Authority.

Table 6. Current members of the NCP and NCP Secretariat

Body	Members	Function
NCP	Frode Elgesem	Chair of the NCP, proposed by the government
	Anita Househam	Member of the NCP, proposed by businesses
	Liv Tørres	Member of the NCP, proposed by trade unions
	Carin Leffler	Member of the NCP, proposed by civil society

Body	Members	Function
NCP Secretariat	Kristel Tonstad	Head of Secretariat
	Per Bondevik	Senior Advisor
	Åse Kristin Sand	Senior Advisor

Source: Norwegian NCP (2025^[14]), About us, <https://responsiblebusiness.no/en/about-us/this-is-ncp-norway/>.

Functions and operations

The Norwegian NCP's mandate defines as the NCP's tasks to:

- “assist the Norwegian authorities in the work of promoting the Guidelines”
- “process inquiries received by the NCP and assist with advice and guidance within the framework of the Policy and the Statement. Individual cases are handled in accordance with the Guidelines' guidance on procedures, including comments, as well as the NCP's Procedures for handling individual cases”
- “contribute to the optimal functioning of the OECD NCP scheme, including ensuring that the OECD and the Guidelines' objective of functional equivalence [...] is ensured” (Ministry of Foreign Affairs, 2022^[11]).

Moreover, the NCP is mandated to serve as a grievance mechanism to handle complaints based on the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. The practical relevance appears to be limited. So far, no cases have been submitted with specific reference to the ILO Declaration and stakeholders have not raised this aspect of the mandate in the course of the peer review.

Support to policy efforts on RBC is already partially reflected in the NCP's mandate. Since the 2023 update of the OECD Guidelines, NCPs may support “efforts by their government to develop, implement, and foster coherence of policies to promote RBC” (OECD, 2023^[2]). Two aspects of policy-related work are already part of the Norwegian NCP's mandate (Ministry of Foreign Affairs, 2022^[11]). At the request of the government, the NCP can support the government's engagement with the OECD on RBC, and in particular in the Working Party on RBC, and may also represent Norway in the WPRBC. Moreover, since the NCP mandate's update in 2022, the NCP is tasked with co-operating with the Consumer Authority, and shall provide non-binding advice to ensure a coherent interpretation of the OECD Guidelines, which are referenced in the Transparency Act (Norway, 2021^[16]; Ministry of Foreign Affairs, 2022^[11]).

The NCP Secretariat carries out the daily work of the NCP. The mandate only specifies that the NCP has a Secretariat that supports the NCP and prepares specific instances without deciding on cases (Ministry of Foreign Affairs, 2022^[11]). The NCP adopts its own case-handling procedures (Norwegian NCP, 2025^[17]). These set out that the Secretariat “manages promotional activities on the Guidelines and related due diligence guidance, responds to inquiries and prepares specific instances for assessment by the independent experts” (Norwegian NCP, 2025^[17]) (see Case-handling procedures). An update to the mandate could be an opportunity to reflect full range of the Secretariat's work with regard to promotion, case-handling as well as support to policy (see The role of the NCP).

The NCP broadly determines its own functioning including on its decision making. The mandate sets no requirements beyond annual reporting on progress and planning to ministries, and six-monthly meetings on administration and budget between MFA and the NCP Secretariat. However, neither mandate nor case-handling procedures contain specific information on decision making within the NCP. The NCP indicates in this regard that most decisions are taken by consensus, with only a single case decided with a vote, where the initial assessment and final statement stated that there was a lack of consensus (without a dissenting opinion). To avoid the possibility of a split vote (which, according to the MFA's advice to the

NCP would be resolved by the NCP Chair), the NCP has proposed that a fifth member of the NCP could be appointed. Setting out the NCP's decision making processes, e.g. in the mandate and/or case-handling procedures, could further enhance its transparency.

The NCP meets 8-10 times a year. Meetings last around 2.5 hours and cover the full range of the NCP's activities, focussing on specific instances, but also covering institutional aspects such as mandate renewal and recruitments to promotional activities. Minutes of its meetings are published on the NCP's website, including summary information on progress in specific instances.³

Resources

The NCP Secretariat considers it is adequately resourced for now in terms of the budget for its activities. At the time of the last peer review, the NCP Secretariat had two full-time staff. The Secretariat currently has three full-time staff. Within the NCP network, three full-time staff place Norway's NCP Secretariat in the top 30% of available human resources (OECD, 2025^[18]). Financial resources also allow contracting services to complement the NCP's human resources, notably for external mediators and communications and graphic design expertise. In its annual reporting to the OECD, the NCP indicates that its resources allow it to fulfil its responsibilities.

Turnover and delays in recruitment has at times constrained the Secretariat's capacity. Recruitment of new staff has at times meant that the Secretariat operated with only two staff for extended time periods. The Secretariat works to ensure continuity and institutional memory in the NCP's operations. To achieve this, the NCP Secretariat maintains an updated handover note and file management system, introduces new staff to key partners and ensures that experienced staff help onboard new staff in the management of specific instances. This is also acknowledged by stakeholders. Stakeholders also praise the Secretariat's expertise.

NCP members face time constraints in case handling. As each member continues full-time employment in their respective function and does not have a quota of their time allotted to serve on the NCP, this limits their ability to engage in management of more complex cases. Moreover, when members withdraw from a case due to rules for conflict of interest, finding a replacement on an ad hoc basis can delay case handling (see Impartiality and avoidance of conflict of interest in handling specific instances). To address this challenge, a proposal from the NCP to the MFA has been to appoint standing deputy members. Businesses and civil society stakeholders indicated in this regard having already pre-identified deputies.

Turnover in the ministries dealing with the NCP has at times also affected operations. This is particularly relevant for the appointment of NCP members, recruitments of Secretariat staff and the NCP mandate.

The NCP has a dedicated budget, decided annually by the MFA. This budget amounted to NOK 5.5 million in 2024 (around USD 512 000), covering in particular staff costs for the Secretariat, compensation for the NCP members, as well as operating expenses of NOK 2.4 million, notably the purchase of third-party services for mediation, communications and organisation of promotional activities (Norwegian NCP, 2025^[19]). In 2011, the NCP's budget stood at NOK 4 million (Norway Peer Review Delegation, 2014^[6]). Accounting for inflation,⁴ the NCP's budget slightly decreased in real terms. The NCP has generally not had the possibility to carry over unspent resources from one year to the next except for in 2024. Making this possible on a regular basis would be important considering that substantial expenses are not necessarily easy to anticipate, particularly when it comes to mediation. For example, planned expenses for mediation in a case were not needed in one year, and insufficient staff capacity due to turnover limited the NCP's ability to undertake promotional activities (Norwegian NCP, 2025^[19]).

Stakeholders from all constituencies agree that the NCP's resources allow it to deliver on its current functions but highlight resource constraints. Indeed, some stakeholders explicitly acknowledge the quality of the NCP's work despite limited resources. They stress that the adoption of the Transparency Act has

substantially increased attention to RBC and demand for the NCP's expertise. A number of stakeholders from business, civil society and government underline that limited resources impede the NCP's activities, while some government stakeholders consider resources sufficient. Most stakeholders underline the need for broader outreach and promotion and underline that the current level of resources does not allow the NCP to meet greater demand. Some stakeholders also suggest that additional resources could allow the NCP to deepen its own or access external expertise on specific issues.

The NCP has indicated that limited resources lead to trade-offs between case management and promotion. This was already highlighted as a challenge in the previous peer review (Norway Peer Review Delegation, 2014^[6]). While there is flexibility in using the budget, the NCP flags resource constraints in light of growing demand. In its staff time resource allocations, the NCP Secretariat prioritises case management and decreases its promotional activities in case of resource constraints, for example during a period of understaffing in 2024. Moreover, the NCP highlights that cases are becoming more complex, requiring more substantial resources both in terms of staff time and finance, notably to purchase third-party mediation services. These dynamics put pressure on the NCP's resources, especially if it was to accept and address a larger number of cases. To save time and financial resources required for identifying, procuring and working with a third-party mediator, the NCP Secretariat currently trials the use of one staff as a mediator in an ongoing specific instance (Norwegian NCP, 2025^[19]). The NCP considers that more stable and additional staffing could also help address constraints for promotional activities. In this regard, it highlights a need for communications capacity to enhance the effectiveness and reach of its promotional activities and strengthen the NCP's ability to engage in public debate in the face of growing media reporting on specific instances.

A range of options are considered to address resource constraints. At the level of the NCP, an additional 5th member could act as deputy chair, lead drafting of some specific instances and/or act as mediator. However, this would be subject to their availability for this more intensive engagement, so exploring employer support for the engagement on the NCP would be an important complement. It might need to be considered that a 5th member might impact the balance of constituencies. At the level of the Secretariat, an additional staff member could notably increase capacity for communications. The Secretariat could also explore maximising the impact of its current resources. For example, co-ordinated planning of promotional activities with other stakeholders in Norway could create synergies and allow the NCP to focus its own efforts where its added value is greatest. Finally, the NCP could consider for which issues there is a need for additional internal human resources, and for which issues services could be purchased through additional financial resources (as has been the case in the last five years for external mediation, even if this implies a time commitment by the Secretariat).

Reporting

The NCP reports publicly on its activities. It reports annually to the OECD Investment Committee and makes these reports publicly available since 2006.⁵ The website also contains detailed information on the NCP's activities throughout the year, with updates on events and specific instances.⁶ Meeting summaries of all NCP meetings are published in Norwegian on the NCP's website.⁷ The NCP itself does not report to Parliament. However, the MFA reports to Parliament on the NCP's activities. In addition, until 2023 the NCP used to produce an annual report intended for the wider public (Norwegian NCP, 2024^[20]). This professionally designed report provided background information on the NCP, promotional activities, specific instances, policy advice, international co-operation and the NCP's budget. To streamline reporting, the NCP has discontinued this annual report and provides key information in an article on its website, a new brochure on the NCP as well as regular updates on the website and LinkedIn (Norwegian NCP, 2025^[21]).

The NCP does not have an oversight body but regularly reports to the mandating ministries on its work. The mandate specifies that the NCP operates independent of government – ministries cannot give direction to the NCP on how it manages its activities or specific instances. On an annual basis, the NCP provides a report on its past work and planned activities for the next year and connected budget spent and estimates to the MFA, MTIF, MoF and MLSI. The ministries provide feedback to the NCP. This report has been internal for the time being but in light of streamlined reporting, the NCP is considering whether it might be published to serve information to the wider public. The NCP Secretariat reports to the MFA regarding its administration and budget. The NCP also informs the same four ministries on specific instances, both on its initial assessments as well as the final statement. In their feedback, ministries have indicated being satisfied with reporting by the NCP.

Table 7. Findings and recommendations – Institutional arrangements

	Finding	Recommendation
1.1	The NCP's model of independent experts and Secretariat placed in the Ministry of Foreign Affairs is valued by all stakeholders for its effectiveness, representation of stakeholder constituencies and independence. There is a high level of trust in the NCP and its impartiality, and it is strongly recognised for its expertise. The mandate lacks legal status, which diminishes the NCP's visibility. It does not include a general role for the NCP in supporting the development and implementation of policies related to RBC. The suggestion to move the leadership for the NCP and its Secretariat to the Ministry of Trade, Industry and Fisheries (MTIF) raises concerns with stakeholders, notably regarding the NCP's perception of impartiality.	The government should update the mandate of the NCP, taking the following considerations into account: <ul style="list-style-type: none"> • Recognising the role of the NCP to support government policy efforts on RBC and defining how it should collaborate with relevant ministries and government agencies. • Broadening the anchoring of the NCP with additional ministries that are active on RBC related policies. • Strengthening the visibility of the NCP, for example by giving the mandate a legal status or adopting it at a higher level. • Consulting stakeholders and the NCP on any reflections to change the institutional arrangements of the NCP to ensure stakeholder trust and perception of impartiality. • Ensuring that the NCP makes its decision making processes clear and transparent.
1.2	The NCP enjoys a level of human and financial resources that allows it to handle several cases while delivering a substantive range of promotional activities and advise on RBC-related policy. However, resources are not adequate to meet growing demand, in particular due to the Transparency Act and other legislation, increasingly complex cases and expectations for engagement in public debate. Delays in recruitments and appointments are further sources of constraint.	The NCP and the government should explore mobilising additional human and financial resources for the NCP and its Secretariat to meet needs of both capacity and skills, and make more out of existing resources, by reducing recruitment and appointment delays and prioritising activities based on the NCP's added value.
1.3	The NCP does not have an advisory body. It engages with stakeholders through annual meetings, ad hoc collaborations and NCP members' exchange with their respective constituencies.	The NCP should ensure more systematic engagement with stakeholders, for example through consultations on any decision affecting its functioning (e.g. case-handling procedures) and more frequent meetings that allow for the exchange with and across stakeholder groups on issues such as the promotion of RBC and engagement on RBC-related policies.

5 Promotion

Promotional plan

The Norwegian NCP plans its promotional activities as part of its annual work plan. One of the work plan's three dimensions focusses on increasing knowledge of the OECD Guidelines and the due diligence. The plan is submitted to the MFA and published in Norwegian on the website (Norwegian NCP, 2025^[22]). The plan encompasses actions in different areas of promotion, notably organising and participating in events, developing guidance tools and information material as well as communication including through the NCP's website and (social) media. Feedback from stakeholders, e.g. on specific challenges in implementing RBC, informs the NCP's planning. In addition, the NCP has developed a draft communications plan in collaboration with a communications expert. This allowed to better focus the NCP's social media activities and reflections regarding its branding, including on whether a different name for both NCP and Secretariat such as "Responsible Business Norway" could raise the NCP's visibility.

Planning of promotional activities based on stakeholder consultation and co-ordination could create synergies. In Norway, a broad range of stakeholders are active in the promotion of RBC. Among public institutions, this includes first and foremost the Consumer Authority with information materials on due diligence and reporting under the Transparency Act and courses offered together with the NCP, but also ministries and agencies engaging with Norwegian businesses in the context of state ownership, trade and investment promotion and public procurement. Multi-stakeholder, business, trade union and civil society actors also offer a range tools, promotional materials and trainings. For example, Ethical Trade Norway offers courses, helpdesk services, good practice guidance and self-assessment tools; UN Global Compact Norway offers tools and seminars; and Amnesty International has developed an e-learning on RBC and offers courses on business and human rights and due diligence. Commercial actors also offer RBC-related services. Against this background, the NCP and in fact all stakeholders would gain from moving from ad hoc collaboration to a more strategic approach in their promotion of RBC. Respected by all stakeholders, the NCP could be well-placed to facilitate consultation meetings of key promotional stakeholders and promote multi-annual planning, so that efforts can more easily build on one another.

Contributions from all stakeholders will be needed to respond to significant demand for information on RBC notably as an estimated 9 000 companies are within scope of the Transparency Act, and the NCP anticipates that a revision of the act would likely spark again significant interest. Stakeholders strongly underscore the need to reach beyond the usual audience, notably to small and medium-sized enterprises (SMEs), businesses outside Oslo and larger cities, and corporate functions of high relevance such as procurement. Stakeholders also underline the need to explain standards in plain language, guide on their application in actual business practice and set out where to start and what is considered "good enough". Further guidance on challenges around conflict as well as greenhouse gas (GHG) emissions and other environmental issues could also be useful. They also stress that not only businesses but also ministries, agencies, trade unions and civil society organisations are in need of information to play their role in creating an enabling environment for RBC.

To make the most out of its limited resources, the NCP's promotional activities need to be guided by greater consideration for the NCP's comparative advantage within the Norwegian stakeholder landscape, considering where the NCP is well placed to deliver an activity, and where might others have better access,

specific experience or resources. In this regard, several stakeholders highlight the NCP's expertise on RBC in general and the OECD Guidelines in particular. For example, the NCP could focus its promotional activities on more advanced RBC issues, while other stakeholders' activities, e-learning and related tools could inform about basics. The NCP could also to a greater extent address topics covered by the OECD Guidelines but not the Transparency Act (e.g. risks in the downstream value chain or environmental issues). Some stakeholders also highlight the NCP's position as a public body with a Secretariat based in the MFA as advantageous when advising ministries, public agencies and embassies on the integration of RBC in their work.

To plan its activities, the NCP would also gain from a better sense of the results of its activities. At present, the plan does not define results indicators or targets for the NCP's activities. The NCP reports on information of the audience its reaches and collects feedback from training participants, the majority of whom found the trainings to be of high quality. The business survey indicated that respondents familiar with the NCP and its trainings are also more aware of the OECD Guidelines and RBC. Building on these sources of information, it would be useful to define and monitor results also in terms of behavioural changes, for example by encouraging training participants to develop and report back on action plans.

A survey has provided insights on RBC awareness and action of businesses in Norway. The latest survey was conducted in 2023 and collected more than 600 responses from businesses (Norwegian NCP, 2023^[23]).⁸ A similar approach as in 2019/20 allowed for comparisons across time. To undertake the surveys, the NCP commissions an external provider. Findings in 2023 indicated an upward trend in terms of companies' awareness of international and national due diligence expectations and actions they are undertaking. For example, almost half of responding businesses map their potential adverse impacts, including 82% of businesses with more than 100 employees, and 77% of boards are engaged in questions of RBC and sustainability (Norwegian NCP, 2023^[23]). Undertaking such surveys is good practice and in Norway has been important to provide evidence in the preparation of the Transparency Act (see The role of the NCP). The NCP plans a new survey for 2026.

The survey also provides feedback on awareness of OECD standards and the NCP's work, illustrating room for progress. Knowledge of the OECD Guidelines and the NCP itself remains limited, with 35% of respondents from businesses with activities abroad being familiar with the Guidelines, 16% with Due Diligence Guidance and 10% with the NCP (Norwegian NCP, 2023^[23]). The NCP and stakeholders assume that scores could be higher now owing to the growing familiarity of companies with requirements under the Transparency Act. The survey is complemented by six in-depth interviews that provide additional feedback on the NCP's activities. Interviewees highlight that the NCP is not known enough, including by local authorities (Norwegian NCP, 2023^[23]). Stakeholders from different constituencies to the peer review acknowledged the NCP's visible engagement but similarly highlighted that the NCP would benefit from greater visibility and stronger engagement in public debate. A review of the effects of the Transparency Act highlighted that "[t]here may be potential for even better use of existing forums, such as the Norwegian NCP for RBC, to promote cooperation between the business sector and consumers" (KPMG, 2024^[24]).

Information and promotional materials

The NCP makes OECD standards available on its website and has provided translations for some. The OECD Guidelines, the OECD Due Diligence Guidance and sectoral guidances are available in English on the NCP's website, and a link in another section points to the OECD Recommendation on the Role of Government in Promoting RBC. For the Due Diligence Guidance, the NCP developed an introductory document in Norwegian (Norwegian NCP, 2019^[25]). Translations are available for the sectoral guidances on garment and footwear (Norwegian) as well as for meaningful stakeholder engagement in the extractive sector (Norwegian and Sami).⁹ To inform about its work as a non-judicial grievance mechanism in 2020,

the NCP issued a collection of 10 specific instances within the NCP network (Norwegian NCP, 2020^[26]). It has also developed a new promotional brochure on its role.

The NCP has developed a wide range of information materials and tools to support enterprises in conducting risk-based due diligence. To make the due diligence process accessible, the NCP produced a 5-minute video in Norwegian (Norwegian NCP, 2023^[27]). Together with Norway's Human Rights Institution, the NCP issued examples of adverse human rights impacts (Norwegian NCP/Norwegian Human Rights Institution, 2023^[28]). In 2022, together with the employer organisation NHO and the anti-corruption CSO Transparency International, the NCP developed and published a collection of 22 dilemmas that businesses can face regarding RBC, and how they can respond to them (Norwegian NCP, 2022^[29]). The NCP also developed two self-assessment tools. An online tool (in Norwegian) takes companies through the six steps of the OECD Due Diligence Guidance and provides them with a profile of their performance (Norwegian NCP, n.d.^[30]). The RBC Compass is a tool that covers possible actions of enterprises against all areas of the OECD Guidelines (see Box 1).

Box 2. The RBC Compass

The RBC Compass is a downloadable tool that allows companies to assess their current performance against all areas covered by the OECD Guidelines. For each area, the tool provides a number of good practice statements, e.g. "Stakeholders are provided with accurate, timely information on the environmental impact of our operations, products and services". The company can then indicate its current status from "not initiated" to "advanced". For each statement, the tool also provides additional detail and a reference to the OECD Guidelines.

Building on this self-assessment, the RBC Compass can also function as an action plan and progress monitoring tool. For each good practice, the company can define the target status it would like to reach, identify necessary follow-up actions and assign responsibility. Follow-up actions are compiled, and a dashboard provides a high-level overview of completion of information, the status in each area and progress towards targets.

The first version of the RBC Compass, issued in 2018, was subsequently translated into Spanish and disseminated by the NCP of Chile. Following the update of the OECD Guidelines, the NCP proceeded with a significant update of the RBC Compass. To do so, it contracted a business consultancy and invited public feedback to the tool, notably on its user friendliness. The updated tool was released in July 2025 in English and in August 2025 in Norwegian.

Source: Norwegian NCP (2025^[31]), RBC Compass, <https://responsiblebusiness.no/en/the-rbc-compass/>.

Stakeholders highly appreciate available materials and encourage further work. Feedback indicates stakeholders know the materials the NCP has produced and find them useful, including the introductory guide to due diligence, the collection of dilemmas and the self-assessment tools. They welcome the existing translations into Norwegian, in particular of the OECD Guidelines as a source for common language on RBC and suggest that more content could be made available in Norwegian. They also encourage developing or providing more in-depth material for specific sectors (e.g. the financial sector) and issues (e.g. RBC in conflict areas), and suggest tools specifically designed for SMEs to reflect their lower levels of awareness and readiness to integrate RBC in their operations, as the last business survey highlighted. Specific tools are mostly designed for businesses as target audience, and stakeholders underlined the importance to promote RBC also with other stakeholders, both in ministries and government agencies as well as trade unions and civil society.

Promotional events

The NCP regularly (co-)organises events to raise awareness of OECD RBC standards and promote RBC in Norway. In both 2023 and 2024, the NCP organised 12 events. A key partner in this regard is the Consumer Authority, with whom the NCP has been delivering joint workshops for businesses in different locations across Norway. These trainings (ranging from half-day to two-day workshops) include information on the Transparency Act and RBC due diligence, experience sharing by businesses as well as a training session on addressing dilemmas (Norwegian NCP, 2024^[32]). Some workshops took place in secondary cities, which have been important to reach businesses outside Oslo. In the past, the NCP organised due diligence trainings for companies, also including usage of the RBC Compass. The NCP also co-organises sectoral and thematic conferences open to the public, with speakers and participants from diverse stakeholder constituencies. In recent years, this included for example a conference on the updated OECD Guidelines with a focus on RBC and climate change, events on implementation of the Transparency Act, on RBC and the financial sector, on the EU Corporate Sustainability Due Diligence Directive and on responsible business in high risk and conflict areas (Norwegian NCP, 2023^[33]; 2023^[34]; 2023^[35]; 2024^[36]; 2025^[37]).

The NCP also actively participates in events organised by other stakeholders. In 2024, it contributed to 22 events, and 26 events in 2023. For example, the NCP regularly gives presentations on RBC and its work as part of university courses and training of new MFA diplomats. Other organisers also include business associations, trade unions, civil society organisations, law firms, and public sector institutions (including in OECD countries). Some of the events address specific issues, such as RBC and conflict, procurement, a living wage, business in China, and, frequently, the Transparency Act (see Annex C). The NCP also regularly participates in one of Norway's foremost events for multi-stakeholder policy dialogue, Arendalsuka.

Stakeholders welcome the NCP's efforts. For example, business survey interviewees provided very positive feedback on trainings and suggested including even more practical examples. Co-organisers of events expressed appreciation to the NCP. Stakeholder feedback for this peer review flagged low business awareness of RBC and the NCP and cautioned about the limited reach of individual events. However, in the last two years the NCP has recorded a significant increase in its reach compared to the past: in 2023, the NCP estimates to have reached more than 4 000 participants through its various outreach events, and around 1 800 in 2024 (Norwegian NCP, 2024^[20]; Norwegian NCP, 2025^[21]). As set out above, stakeholders underline the need to target businesses that are not or less familiar with RBC, and expand the offer to non-business stakeholders. They also suggest holding more events online to allow wider access.

Website and media

The NCP has its own website that provides detailed information on RBC and the NCP's work. Many pages are available in both Norwegian and English,¹⁰ with few mismatches between both versions. In 2025, the NCP updated website visuals and graphic design to enhance its visibility and is currently updating its structure with a view to making it more user-friendly. Information available on the webpage of the NCP is quite comprehensive, covering:

- The NCP and Secretariat, its mandate as well as annual reports and NCP meeting summaries
- News, in particular on events
- Documentation on specific instances and information for filing a case
- Information on the OECD Guidelines and sectoral guidances
- Information on tools and materials, including the RBC Compass

The NCP is active on social media. Having discontinued its activity on Facebook and X, it concentrates its efforts on its own LinkedIn account based on advice from a communications professional.¹¹ One to several times a month (in total 15 in 2024), it publishes information on its own activities and reposts information by other stakeholders such as the Consumer Authority or the OECD. It has close to 1 500 followers, comparable to the Consumer Authority. Stakeholders are aware of the NCP's LinkedIn presence.

A regular newsletter and ad hoc publications complement the NCP's communication outreach. The newsletter informs subscribers about recent news items. In 2024, the NCP issued an op-ed in a magazine published by Norway's development co-operation agency Norad (Norwegian NCP, 2024^[38]). This addressed a challenge for businesses, namely questions of RBC due diligence in the context of an ongoing conflict.

Specific instances and their final statements are increasingly covered by large-scale Norwegian media, including the Norwegian Broadcasting Corporation and Norway's largest business newspaper. These are examples of how the NCP's work is referenced in wider public debate. At the same time, media reporting and public reactions to NCP cases also present risks of misrepresentations of the work of the NCP and the OECD Guidelines. The NCP therefore highlights increasing pressure for it to engage more in public debate, while recognising also opportunities for increasing the NCP's visibility.

Stakeholders are very positive regarding the quality of the website. They praise easy access and structure, informative content, and regular updates. Some use the website as a reference tool when sharing information about RBC. One stakeholder noted that news items and social media postings were mostly focussed on a description of activities the NCP participated in. They suggested that the NCP could use these postings to also share knowledge about due diligence and good practice. The NCP highlights that communications capacity in the Secretariat has been instrumental in improving its outreach, illustrating the need for these skills.

Responding to enquiries

The NCP has their contact details listed on the webpage (email and postal address). The guiding form for submitting complains also invites users to contact the NCP for any questions (Norwegian NCP, n.d.^[39]). Stakeholders consistently highlight the NCP's ease of accessibility and readiness to provide advice on RBC, participate in promotional events and explore opportunities for collaboration. Norway's Freedom of Information Act allows any individual to submit inquiries into documentation of public and private institutions. It applies to the NCP, which receives such requests occasionally.

Co-operation amongst NCPs

Other NCPs highly appreciate the collaboration with the Norwegian NCP. Nine NCPs from different continents provided feedback for this peer review. They praise the Norwegian NCP for being helpful and willing to provide support and advice in a timely manner to other NCPs. They underline the NCP's deep knowledge of the MNE Guidelines and RBC. Where the NCP shared insights based on cases, other NCPs also appreciated the care to respect confidentiality. The Korean NCP also references the website of the NCP as a useful resource.

Collaboration takes different forms. With some NCPs, the Norwegian NCP has informal dialogue to exchange on shared challenges and approaches, for example on terms of reference for mediation in case management and promotion activities. They also stand ready to provide advice based on their experience. The NCP has contributed to events organised by other NCPs. Regarding formal peer learning, Norway's NCP plays an active role in the Nordic-Baltic network of NCPs, regularly joining with members of the NCP and the Secretariat (Norwegian NCP, 2024^[40]). It participated in the 2021 NCP peer review of Ireland and

the 2023 NCP peer review of Peru. A fellow peer reviewer expressed its strong appreciation for the valuable exchanges with Norway's NCP and sharing of experiences in the course of the peer review. In addition to the Network of NCP, the NCP also contributes to exchanges of the WPRBC on request. The NCP has also co-ordinated with other NCPs around several specific instances (see Co-ordination with other NCPs on specific instances).

Table 8. Findings and recommendations – Promotional activities

	Finding	Recommendation
2.1	The NCP has developed promotional material and tools of great depth, breadth and quality in strong collaboration with a broad range of stakeholders, responding to stakeholder needs and opportunities from political developments. While many stakeholders engage in similar activities, the NCP could co-ordinate better with other actors on the overall promotion strategy in light of respective comparative advantages. A business survey on RBC is good practice to track RBC practice but the NCP does not monitor the more immediate results of its promotional activities.	The NCP should plan promotional activities strategically in consultation with other stakeholders, define priorities based on its added value and comparative advantage, notably its deep expertise on RBC and public mandate, set objectives and track results.

6 Specific instances

Box 3. Terminology for the status of specific instances

- Specific instances **concluded** are those that the NCP found to merit further examination after the initial assessment and that have subsequently been closed. For such specific instances, the NCP will have offered its “good offices” (e.g. mediation/conciliation) to both parties.
- Specific instances **not accepted** are those that the NCP found not to merit further examination, or cases that have been withdrawn prior to the completion of the initial assessment and that have therefore been closed.
- Specific instances **closed** include both specific instances that have been concluded and those that were not accepted.
- Specific instances that are **ongoing** are those that are not yet closed. These include submissions received by the NCP, both those awaiting initial assessment, as well as those accepted by the NCP.

Source: OECD, (2025^[18]), National Contact Points for Responsible Business Conduct in a changing landscape: 2024 Annual Report on NCP Activity, https://www.oecd.org/content/dam/oecd/en/networks/national-contact-points/OECD-2024-Annual-Report-on-NCP-Activity.pdf/_jcr_content/renditions/original/OECD-2024-Annual-Report-on-NCP-Activity.pdf.

Overview

As of the date of the on-site visit, the NCP had received 24 specific instances in total (18 since 2011). Fourteen were concluded by the NCP, one of which is currently undergoing follow-up, six were not accepted, and four are ongoing.¹²

Among the 14 concluded cases:

- Four concluded with agreement within the NCP process.¹³
- Ten concluded without agreement, all resulted in determinations, and nine included recommendations.¹⁴
- Five concluded cases underwent or have a planned follow up.¹⁵

The main sectors concerned by specific instances handled by the NCP are the financial sector (5 cases) and the energy sector (4), as well as ICT and fisheries (each 2). In terms of submitters, civil society organisations submitted more than half of cases (12) (in some cases jointly with other stakeholders). They are followed by trade unions (6).

The most frequently raised chapters of the Guidelines in cases handled by the NCP are the chapters on Human Rights (IV) (13 cases), General Policies (II) (10 cases), followed by Disclosure (III), Employment (V) and Environment (VI) (each 5 cases).

An overview of all cases handled by the NCP is available in Annex D.

Case-handling procedures

Overview

The Norwegian NCP updated its case-handling procedures in 2025, following the update of the Guidelines (Norwegian NCP, 2025^[17]). The updated procedures are available on the NCP's website in Norwegian, Sami and English. Updates were informed by the NCP's lessons from its own work and comparisons with case-handling procedures of other NCPs. The NCP also invited feedback on the draft but received only limited comments, possibly due to the fact that it did not organise a dedicated stakeholder exchange. The procedures notably provide more detail on timelines, the mediation process and deadlines for responding. While not commenting specifically on the updated version, stakeholders find the procedures easy and accessible. Additional detail on mediation also responds to a concern a business stakeholder had raised.

The case-handling procedures present five stages in managing a specific instance. An introduction provides background on the OECD Guidelines and the NCP and sets out important principles for case-handling, referencing the core effectiveness criteria of the OECD Guidelines. Following a section on submitting a complaint, five sections outline how the NCP manages each stage of the specific instance: i) Confirmation and co-ordination; ii) initial assessment; iii) good offices; iv) final statement; and v) follow-up. One business stakeholder suggested developing a short version. An infographic of the stages of the case-handling procedure exists (see Figure 2).

Figure 2. Overview of stages in case-handling by the Norwegian NCP

	Stage	Timeframe	Publication
1	Stage 1 Confirmation and co-ordination	Within two months after receipt of the specific instance.	Information that submission has been received on specific instance web-page, updated with names of parties after the company has submitted its response.
2	Stage 2 Initial Assessment	Within three months after receipt of the specific instance.	Published, normally jointly with the complaint and the enterprise's response.
3	Stage 3 Good offices ⁶	After consultation with the parties, establish a reasonable timeframe to resolve the issues raised. Within a further 6–12 months, with a possibility of extension to obtain facts, or if extension is otherwise deemed necessary.	No publication, unless parties agree to publish update on the dialogue and mediation.
4	Stage 4 Final Statement	Within three months after conclusion of the good offices phase.	Published.
5	Stage 5 Follow-up	Within 12 months after publication of the final statement.	Publication of follow-up statement.

Source: Norwegian NCP (2025^[17]), Case-handling procedures, <https://files.nettsteder.regjeringen.no/wpuploads01/sites/263/2025/04/Case-handling-procedures-NCP-Norway-2025.pdf>.

Filing a complaint

Complaints can be submitted in writing (see the section of the case-handling procedures on “Submitting a Complaint”). A submission form is available on the website in Norwegian and English. The NCP indicates that it can assist with translation on request. Use of the submission form is not mandatory. The submission may be sent by mail or e-mail. In addition to a specific description of the complaint including supporting documentation, the form also requests that the submitter include information regarding the preferred remedy, efforts to engage with the company on the issue and linkages to other NCPs. One business stakeholder suggested that the NCP could provide more advice to potential complainants. However, it should be noted that the NCP’s website links to OECD Watch’s guidance for complainants. (OECD Watch, n.d.^[41]). The same link or information of a similar nature is not included in the submission form or the case-handling procedures.

The procedures foresee handling receipt of complaints within 10 working days (Section on Stage 1: Confirmation and co-ordination). This will include acknowledging receipt vis-à-vis the complainant and transfer of the complaint to the company concerned with a request to respond, also within 10 working days. A civil society stakeholder suggests that the NCP publish the name of the company concerned already upon receipt of the complaint to encourage a company’s engagement with the NCP. The NCP has recently introduced this practice, noting that the case-handling procedures mention publication at the stage of the initial assessment. Prior to proceeding with the initial assessment, under the case-handling procedures the NCP will also assess conflicts of interest (Section 1.3 on concepts and principles) (see below).

Co-ordination with other NCPs on specific instances

After receiving the complaint, the case-handling procedures foresee an assessment on whether or not the NCP is the correct entity to handle the case (Section on “Stage 1: Confirmation and co-ordination”). Regarding co-ordination with other NCPs, the case-handling procedures simply link to the OECD Implementation Procedures as well as the Guide for National Contact Points on Co-ordination in Specific Instances.

Initial assessment

The case-handling procedures set out six criteria for assessing whether or not the NCP accepts the complaint for further assessment. These correspond exactly to the criteria set out in the commentary to the Implementation Procedures of the OECD Guidelines.¹⁶ In addition, Norway’s case-handling procedures provide a brief explanation of what is meant by each criterion.

The case-handling procedures provide that the NCP will engage with parties as part of the initial assessment (Section on “Stage 2: Initial Assessment”). At the start of the process, the NCP will share information on the overall process and offer to meet with parties. The NCP will then consult parties on the issue raised and, on this basis, prepare the draft initial assessment. The draft will be shared for factual comments; the NCP reserves discretion over whether to incorporate comments. The initial assessment statement will be published on the NCP’s website. The aim is to conclude the initial assessment within three months of receipt of the complaint.

Although the procedures do not set out a specific process or criteria for administratively dismissing a complaint before an initial assessment, the NCP did in practice dismiss some complaints where submissions were found not be within the scope of the OECD Guidelines (see below Non-accepted cases).

Good offices

The case-handling procedures foresee that the NCP meets with parties to set out two options for next steps: 1) As priority, good offices through dialogue and mediation; and 2) as fallback, examination of the

case in full or in part by the NCP, in case parties do not agree to mediation or end the mediation process without agreement (see case-handling procedures section on “Good offices”). The NCP will set out advantages of dialogue and mediation to the parties. This clarification in the case-handling procedures also responds to feedback from stakeholders who suggested greater clarity on the mediation process and the role of the NCP should mediation fail. Mediation may be conducted by external mediators, in which case the NCP members play no formal role, but mediators can seek advice from the NCP Secretariat as needed. It is also possible that the NCP itself acts as mediator through a member of the NCP or the Secretariat.

Case-handling procedures provide further detail on the mediation process (see section on “Option 1: Dialogue and mediation”). At the start of the mediation process, mediators and the NCP will support the parties in agreeing on a framework for mediation. The NCP may also set a timeframe for seeking a solution. Case-handling procedures recommend high-level involvement for both parties and underline that legal representation may not be conducive to a successful mediation. Mediation typically takes place in Norway, and the NCP can support travel cost for participation where necessary. External mediators are contracted by the NCP Secretariat. Case-handling procedures stress that the outcome of the mediation (typically a joint statement or agreement) should be as specific as possible in terms of the measures to be taken, responsibilities and timelines, so as to enable follow-up.

Examination by the NCP involves exchange with the parties and fact-finding as necessary (see section on “Option 2: Examination by the NCP”). The NCP will seek further information and meet with parties, separately or jointly. Case-handling procedures set out that the NCP can also consult other institutions in Norway and abroad, seek expert advice and conduct fact-finding missions as needed.

Conclusion

The case-handling procedures provide for a final statement in all cases (see section on “Stage 4: Final statement”). This will include information on background and process, and whether parties have acted in good faith. Where an agreement was found, the statement may include further detail on the agreement if the parties agree as well as recommendations by the NCP. Where no agreement was found, the NCP may issue a determination of whether or not the OECD Guidelines were observed by the company and provide recommendations and suggestions. As with the initial statement, parties are to be consulted on a draft statement, with the NCP reserving the right to integrate comments. The NCP will normally inform the four ministries providing its mandate of its statements. There is no separate process to share information on the good faith engagement of parties, but this can be addressed in the Final Statement as per the NCPs case-handling procedures (Stage 4 – Final Statement). It can also be included in briefings on specific instances to ministries (see The role of the NCP).

Follow-up

Under the updated case-handling procedures, follow-up includes both an NCP statement and feedback from the parties (see section on “Stage 5: Follow-up”). The NCP will invite parties to a meeting 12 months after the final statement to discuss progress on the issues raised in the case. It will share the draft follow-up statement with parties for comments, prior to publishing the statement. Importantly, the follow-up process can also provide an opportunity for learning, as both parties are invited to evaluate the specific instance process, and their evaluations can be published at the request of the parties.

Indicative timelines

The case-handling procedures set indicative timelines for the overall process and each phase (see section on “3. Handling specific instances and figure above). The NCP will co-ordinate with other NCPs within the first two months after submission. The initial assessment should be completed within three months of

submission. For the good offices phase, the case-handling procedures allow 6-12 months and a possible extension where necessary. The final statement should be issued within three months after the good offices conclude. The overall process could therefore typically take from 12 to 18 months, compared to 12-14 months set out in the OECD Implementation Procedures commentary. Follow-up is planned to take place 12 months after the final statement.

Confidentiality and transparency

The case-handling procedures include a short section on transparency and confidentiality (see section on “1.3 Concepts and principles”). They set out that transparency is a core criterion for the NCP’s work and underline that “[t]o ensure an equitable process, the parties will be notified of relevant information, facts and arguments brought forward by the other party – particularly during the good offices phase” (Norwegian NCP, 2025^[17]). The procedures acknowledge the need to balance this with confidentiality requirements. The procedures reference two important pieces of Norwegian legislation that apply to the NCP in this regard, the Freedom of Information Act (Norway, 2021^[42]) and the Personal Data Act (Norway, 2022^[43]). To manage confidentiality, e.g. to protect complainants or sensitive business information, the NCP will work the concerned party to redact and share information as appropriate. The submission form highlights that information will be shared with the company concerned and can also be subject to public disclosure, so that documents should be marked as confidential where necessary.

During mediation, parties are expected to respect confidentiality. “Parties undertake to observe confidentiality except to the extent that it is necessary to seek professional advice or guidance from within their organization, who will also be expected to observe confidentiality. Parties should be aware of the effect any public statements may have on the mediation process. If a party fails to respect confidentiality, the mediator(s) may discontinue the process” (Norwegian NCP, 2025^[17]) (see section on “Option 1: Dialogue and mediation”).

Where the NCP examines a case, the case-handling procedures stress that all information is shared “unless a strong case is made for information to be withheld” (see section on “Option 2: Examination by the NCP”).

Case-handling procedures stress that reprisals are impermissible. They underline that good faith engagement of parties means refraining from reprisals against parties or the NCP. The procedures advise that complainants in fear of reprisals should appoint a representative (an aspect not mentioned in the submission form). They state that the NCP will “take any available steps within its capacity to provide adequate protection to the person at risk”, also referencing the OECD Implementation Procedures (see section on “1.3 Concepts and principles”). The case-handling procedures themselves do not specify that the NCP should consult with the person at risk in taking those steps. The NCP has already gained some experience in addressing risks of reprisals, including choosing a safe location for mediation and delaying the start of the mediation in one instance. A future update of case-handling procedures could provide further information on the NCP’s approach, where the NCP could also draw on the experience of the NCP network.

Impartiality and avoidance of conflict of interest in handling specific instances

The case-handling procedures underline the importance of impartiality and set out how conflict of interests will be handled (see section on “1.3 Concepts and principles”). It references the OECD Guide for National Contact Points on building and maintaining impartiality (OECD, 2022^[44]). The procedures themselves do not provide further information on criteria, specifying that the NCP is subject to the Public Administration Act (Norway, 2022^[45]). Section 6 in the Act sets out a range of grounds for precluding an official from participating in a decision, including personal conflicts of interests, institutional connections as well as a general clause for “any other special circumstances which are apt to impair confidence in his impartiality”.

It also requires giving due regard to objections raised by one of the parties concerning the impartiality of an official. More detail on the process for managing conflicts of interest in the case handling procedures could enhance the transparency of the NCP's decision making to parties, in particular considering the frequency of potential conflicts of interest in the NCP's practice (see Impartiality and avoidance of conflict of interest in the handling of specific instances).

Parallel proceedings

Case-handling procedures address parallel proceedings as part of the initial assessment criteria (see section on "Stage 2: Initial Assessment"). The submission form inquires whether the complainant has taken up the issue in other forums. The case-handling procedures stress that parallel proceedings do not preclude the NCP from offering its good offices. Rather, the NCP will assess whether its good offices can contribute to a solution, or conversely affect one or both parties, especially in the case of formal court proceedings.

Specific instances in practice

Co-ordination with other NCPs on specific instances

To date, Norway's NCP has co-ordinated with other NCPs in 16 cases. This includes initial co-ordination and informal exchange on cases, as well as formal collaboration in cases, where Norway was either lead or supporting NCP (see Table 9). In these instances, Norway's NCP shared information and advice on the Norwegian context and approach to case-handling, and reviewed drafts.

Other NCPs appreciate the co-ordination with the Norwegian NCP. Nine NCPs provided feedback on their co-operation with the Norwegian NCP. Other NCPs consistently underline the Norwegian NCP's experience in case handling, knowledge of the MNE Guidelines, professionalism, timely responses and readiness to collaborate. In one specific instance, a party expressed dissatisfaction with the two NCPs' decision to handle related cases separately, highlighting the limited information flow at the mediation stage and involvement of the enterprise that was party to the second case. Efforts by both NCPs to promote joint exchanges in the mediation phase failed due to the unwillingness of one party, and the Norwegian NCP acknowledged these challenges in its final and follow-up statements (Norwegian NCP, 2024^[46]).

Table 9. Specific instances where the Norwegian NCP had co-ordinated with other NCPs

Specific instance	Lead NCP	Supporting NCP(s)
Salmon farming in Canada and Chile	Norway	Canada
Oil sands extraction in Canada	Norway	Canada
Fisheries and fish processing in Western Sahara	Norway	Morocco
Human rights breaches related to manufacturing of iron in India	Norway	Korea, the Netherlands
Due diligence in the financial sector in Norway	Norway	United States
Due diligence in the financial sector in Norway	Norway	Korea
Samsung Heavy Industries, Total, Total E&P Norge, Equinor and TechnipFMC, and Korean Transnational Corporations Watch (KTNC Watch) and Samsung Heavy Industries Martin Linge Project Crane Accident Workers Support Team	Norway	France, the United Kingdom
Four trade unions (IUF, EFFAT-IUF, SEIU, UGT) & Norges Bank Investment Management (NBIM)	Norway	Netherlands, the United States
Indigenous people's representatives & Statkraft AS	Norway	Chile
Financing of a pulp mill project in Uruguay	Sweden	Norway
Statkraft AS and the Sami reindeer herding collective in Jijnjevaerie Sami	Sweden	Norway

Specific instance	Lead NCP	Supporting NCP(s)
Village		
Martin Linge Project Crane Accident Workers Support Team & Samsung Heavy Industries	Korea	Norway, France
Society for Threatened Peoples Switzerland & BKW Group	Switzerland	Norway
Four trade unions (IUF, EFFAT-IUF, SEIU, UGT) & APG Asset Management	Netherlands	Norway, the United States
Four trade unions (IUF, EFFAT, SEIU, UGT) & McDonald's Corporation	United States	Netherlands, Norway
Greenpeace Zentral- und Osteuropa, Fridays For Future Österreich/ OMV Aktiengesellschaft	Austria	Bulgaria, Norway, Romania

Source: OECD (n.d.^[47]), Database of specific instances, <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database.html>.

Non-accepted cases

Six out of 20-four specific instances received have not been accepted by the NCP.¹⁷ The NCP issued initial assessment statements in all 17 cases since 2011 to declare whether or not it would accept the case for examination. These statements are published on its website. The statements provide background to the submission and set out the different reasons for accepting or not accepting the case, addressing also the arguments of the parties, for example where an enterprise considers that the NCP should not accept the case. Each initial assessment also stressed that the NCP did not consider the merits of the submission. Reasons for not accepting cases were:

- In three specific instances, the NCP found that the case would not contribute to the purpose of the OECD Guidelines, notably due to a previous decision in a similar case and parallel proceedings.¹⁸
- In two specific instances, the NCP found that the complaint was not directed against a company.¹⁹
- In one specific instances, the submitter did not provide the required additional information.²⁰

Stakeholders agree that the NCP is accessible and does not set a particularly high bar accepting a specific instance. It should be noted, however, that the NCP administratively dismisses some enquiries, where these have not related to the Guidelines or were outside the Guidelines' scope. In some cases, the NCP directly transfers the case to another institution. To ensure transparency, it would be important to clarify in the case-handling procedures under what conditions the NCP can dismiss a case without a formal initial assessment and ensure these do not impede accessibility, transparency or equitability and impartiality.

Considering resource constraints of the NCP, one business stakeholder suggests for the NCP to be more selective in its initial assessments, applying the criterion of contribution to the purpose and effectiveness of the OECD Guidelines to consider whether the case lends itself to the NCP as a grievance mechanism. To focus its resources, the NCP could also explore – in agreement with parties – whether some complaints could be submitted first to a grievance mechanism at company level (see Parallel proceedings).

Accepted cases

Out of 24 cases received, 14 have been concluded. Outcomes in cases in which the NCP offered good offices include the following:

- Four cases were concluded with agreement.²¹
- Ten cases were concluded without agreement.²²

External mediation is an important part of the NCP's approach to good offices. In recent cases, the NCP has resorted to external mediators at the good offices stage. The NCP has developed a standard framework for mediation that can then be adapted to each specific instance. The NCP has exchanged with other NCPs on the use of external mediation, also sharing its experiences in designing terms of reference.

In complex cases, after consulting the parties, the NCP typically appoints two mediators from a list of experienced mediators. Moving forward, the NCP hopes to add an additional member to the NCP with mediation expertise and is currently trying out mediation through Secretariat staff and plans mediation training in 2026 (Norwegian NCP, 2025^[19]).

The NCP highlights the opportunities from mediation while acknowledging it may not necessarily be successful (Norwegian NCP, 2023^[48]). One mediation was particularly successful in that parties are still in regular exchange today exploring RBC issues beyond the specific instance (see Box 4). In three recent cases, however, parties failed to reach an agreement through mediation. For example, two specific instances that were concluded in 2022 both underwent mediation. One resulted in an agreement, while in the other mediation failed to achieve an agreement and was concluded with a final statement, including a determination of observance of the OECD Guidelines and recommendations to the enterprise. This second case was more complex, involving cases before two NCPs and parties in three countries. Moreover, all meetings had to take place online due to the pandemic, while for the first case parties could meet in Oslo. Nonetheless, the mediators considered the dialogue between parties in both processes helpful, as this can also influence a party's perspective (Norwegian NCP, 2023^[48]).

Box 4. Specific instance 1 – Four trade unions & Norges Bank Investment Management (NBIM)

On 18 May 2020, four trade unions submitted a specific instance to the Dutch NCP alleging that the Netherlands-based APG Asset Management and Norges Bank Investment Management (NBIM) did not observe the OECD Guidelines as institutional investors regarding alleged gender-based violence and harassment (GBVH) in the operations of the McDonald's Corporation, a US-based company active in the food sector.

The NCPs in the Netherlands, Norway and the US co-ordinated their engagement and decided to each review the submission independently in three cases. In its initial assessment on 21 June 2021, the NCP accepted the case, outlining that due diligence expectations can apply to minority shareholdings. Parties accepted good offices and, following external mediation, concluded a joint agreement. The agreement was published as part of the NCP's final statement, issued on 22 April 2022. The agreement includes a "Roadmap for further co-operation between the parties" to address GBVH. The NCP conducted follow-up calls with both parties six months later.

Feedback on the case highly valued that mediation sparked continued collaboration between the parties beyond the specific instance. Co-ordination between the three NCPs at the stage of the initial assessment was effective and continued throughout the case. The presence of the NCP Secretariat during mediation was considered helpful in providing expertise on the OECD Guidelines, as was the NCP's support in enabling in-person mediation through experienced mediators at a venue outside Oslo.

Source: Norwegian NCP (n.d.), <https://responsiblebusiness.no/en/unique-grievance-mechanism/specific-instances-handled-in-norway/iuf-effat-iuf-seiu-and-ugt-vs-nbim/>.

Stakeholders generally view mediation practice as positive. They appreciate the consultation on the selection of mediators and describe the process to agree on terms of mediations as smooth. Guidance on confidentiality during mediation is clear, and part of the terms. Most stakeholders appreciate the presence of the Secretariat and advice on the OECD Guidelines during mediation meetings where both parties are present. However, one stakeholder raised concerns regarding impartiality, should the same Secretariat staff be involved in preparing a final statement where mediation is not successful. Establishing a clear division of labour at the Secretariat could help address such concerns. Some stakeholders also underline the significant time spent on mediation, encouraging the NCP to set stricter time limits on the one hand,

but also to mobilise the necessary human and financial resources needed for complex mediation processes on the other.

The NCP has drawn on external expertise in handling and examining cases. In the past, consultants occasionally supported drafting of statements to fill staffing gaps, while the Secretariat now manages all cases itself. It may contract specific expertise, for example on geographic contexts, and has done so for a case concerning Myanmar. The case-handling procedures foresee that the NCP can gather information and expert advice from other institutions, including the OECD (see case-handling procedures section on “Good offices”). For example, the NCP consulted the Chair of the WPRBC and the OECD Secretariat for advice and experience from other contexts. Moreover, the NCP can conduct missions abroad and lead interviews with stakeholders. For more efficient case-handling, the NCP is considering whether it could examine a case based solely on party submissions rather than gathering evidence itself, where complainants are professional institutions.

The NCP has published final statements in all 14 concluded cases. The NCP also issues final statements where cases are concluded through a joint statement or agreement in mediation. In these instances, the NCP provides a short summary of proceedings and short conclusion and – in recent instances – sets out follow-up. The NCP clarifies that it has not considered the merits of a case, but it does look at whether agreements are compatible with the Guidelines. Conversely, where no agreement was found, the NCP’s final statement provides a detailed account of the case and the NCP’s efforts to arrive at solution through dialogue and mediation and the examination that has followed (see Box 5). In all concluded case since 2011, it offers a conclusion on whether or not the company has observed the OECD Guidelines although specificity in the wording may vary. It also issues recommendations to the parties. This includes suggestions for companies to improve their business practice, even where the NCP did not find that the company failed to observe the OECD Guidelines. In several specific instances, the NCP recommended that companies exercise leverage to encourage the provision of remedy. One NCP member notes that final statements are more legalistic and complex to understand, which could intimidate prospective parties and impede the NCP’s public communication. Issuing more plain language summaries and press releases could address such risks.

Box 5. Specific instance 2 – PAX and others & Aker BP ASA and Aker ASA

On 31 May 2022, Pax and other civil society organisations on behalf of an estimated 200 000 persons in South Sudanese submitted a specific instance against Aker BP ASA and Aker ASA, alleging inadequate due diligence in a merger with Lundin Energy's Norwegian oil and gas business regarding that company's ability to remedy alleged human rights impacts that occurred between 1997 and 2003.

In its initial assessment on 27 February 2023, the NCP accepted the case, indicating that one NCP member disagreed. The NCP highlighted that parallel proceedings against Lundin Energy in Sweden would not prevent accepting the case, as the NCP would only focus on the due diligence of the Aker companies.

Parties accepted external mediation but could not find an agreement. In August 2023, the NCP commenced its examination, both parties provided a series of additional submissions, including legal and expert opinions. On 18 June 2025, the NCP issued its final statement, finding that Aker's due diligence did not meet the OECD Guidelines expectations. It recommended that Aker conduct due diligence, and on this basis, consider whether it could take a role in remediation, for example by exercising leverage.

The selection of mediators and preparation of terms of reference was perceived as very smooth. However, multiple, extensive submissions by both parties reinforced a legalistic approach and created a burden that might affect the accessibility for smaller parties. The delimitation of the scope was not perceived as fully effective in the good offices phase. The case also raised the question of impartiality if a member of Secretariat participates in both mediation and subsequent examination.

Source: Norwegian NCP (n.d.), <https://responsiblebusiness.no/en/unique-grievance-mechanism/specific-instances-handled-in-norway/pax-and-others-vs-aker-bp-asa-and-aker-asa/>.

Follow-up

The NCP has conducted follow-up in 4 of 1 concluded specific instances. Follow-up is now a standard feature of the case-handling procedures, while it was optional in the past. Its first follow-up in 2014 included lessons learnt for the NCP itself, notably to ensure that agreements between parties are sufficiently specific to enable follow-up (Norwegian NCP, 2014^[49]). Other lessons learnt included the role of consultants and lawyers in proceedings. In previous specific instances, the NCP provided brief information on follow-up meeting with parties. In its most recent follow-up to a specific instance, the NCP issued an extensive follow-up statement including progress since the final statement and specific information on each of the recommendations (Norwegian NCP, 2024^[46]).

Timeliness

Finalising accepted cases often significantly exceeds timelines foreseen in the case-handling procedures. The decision of not accepting a case is typically taken within several months, albeit generally longer than the three months indicated in the case handling procedures. On average since 2011, when the NCP started working in its new configuration, it took 219 days or around 7 months, with no significant difference between rejected and accepted cases. It should be noted that for more recent cases since 2018, the average for issuing the initial statement increases to 262 days or almost 9 months. When the NCP accepts the case following its initial assessment, the full duration for handling the case averages 24 months or two years since 2011. This is beyond the timeline set out in the new case-handling procedures, and substantially longer than the 12-14 months indicated in the OECD Implementation Procedures. Concluding

recent cases has taken substantially longer. Since 2018, the average is 951 days or around 32 months. One case submitted in 2021 is still ongoing. On the positive side, one stakeholder highly appreciated the NCP's efforts to rapidly issue an initial statement in one case, due to the urgency of the situation.

Timeliness of case handling has been identified as an important concern by both the NCP and stakeholders. In particular business stakeholders flag the need for efficient proceedings, underlining that this can affect predictability and overall effectiveness since findings may no longer be relevant and remedy less relevant. The NCP recognises challenges and suggests efficient case handling as a priority topic for peer learning among NCPs. Challenges for timely decision making are linked to increasing complexity of cases on the one hand and limited resources on the other. For example, submissions of parties become increasingly elaborate, in some cases drawing on internal and external (legal) experts. Co-ordination with NCPs in complex cases can also contribute to time constraints. Availability of NCP members is a challenge, due to their full-time employment, while preparatory work by the Secretariat can be constrained by factors like ongoing work on promotion that the NCP already committed to or gaps in staffing. The efficiency also depends on availability of the parties for meetings and their response-time to submissions by other parties or requests by the NCP.

The NCP is already exploring several options to enhance timeliness. For its initial assessments, the NCP explores a more limited formulation of its findings on each of the six criteria for accepting a case, especially for individual complaints. It also seeks to more clearly delimit the scope of its cases. The NCP sometimes has used questions to steer parties when providing complementary information, to limit the length of submissions and burden on parties. To reduce time spent on identifying and contracting external mediations, the NCP also hopes to conduct more mediations internally (see Accepted cases). In line with its updated case-handling procedures, the NCP now increasingly sets a timeframe for mediation; if no agreement is found within this time, the NCP will proceed to examining the case itself. One party of a case highlighted that the NCP could indeed step in more forcefully if mediation drags on. In cases of failed mediation, the NCP considers setting a limit of two rounds of submissions and reactions. In addition, the NCP could also impose limits on the length of submissions. As an important option for more efficient case-handling, the NCP could also explore alternatives to full-fledged mediation where appropriate, e.g. organising a meeting to facilitate reconciliation.

Confidentiality and transparency

Stakeholders praise the NCP's approach to transparency. In addition to the website that provides key and up-to-date information on the NCP's work, they highlight the timely and transparent sharing of information with parties.

In some specific instances, confidentiality was particularly important. For example, the NCP preserved anonymity of complainants from Myanmar (see Box 6). Most stakeholders appreciated how the NCP was handling confidentiality in proceedings. A significant concern related to the application of the Freedom of Information Act, namely that confidentiality of information submitted to the NCP might not be guaranteed if a request under the act was made to the NCP. It would be important to clarify the extent to which the NCP can ensure confidentiality under the Act and if any of the exemptions from the right of access apply to it.

Box 6. Specific instance 3 – The Centre for Research on Multinational Corporations (SOMO) on behalf of 474 Myanmar-based civil society organisations & Telenor ASA

On 27 July 2021, SOMO submitted a specific instance alleging that Telenor did not observe the OECD Guidelines in preparing the sale of its operations to a Lebanese holding company to disengage from Myanmar.

In its initial assessment on 27 September 2021, the NCP accepted the case. It allowed SOMO to represent the complainants, while the identity of civil society organisations in Myanmar was only disclosed to the NCP out of concern for their human rights. Parties accepted good offices and in June 2022 met for mediation. They agreed on a preliminary memorandum of understanding (MoU), that was subsequently published. The MoU outlined points of agreement and set out further actions, including the commissioning of an independent study, while parties would continue mediation. As parties did not find an agreement, from 11 September 2024, the NCP started its examination. The case was not concluded at the time of writing.

The speed of the initial assessment was appreciated. However, the NCP could have stepped in earlier to stop the mediation process when no further progress could be expected. Parties also highlighted the considerable resources needed for a prolonged mediation, for both the NCP and parties. Confidentiality was an important consideration, testing the NCP's ability to protect complainants and navigate its obligations under the Freedom of Information Act.

Source: Norwegian NCP (n.d.), <https://responsiblebusiness.no/en/unique-grievance-mechanism/specific-instances-handled-in-norway/somo-on-behalf-of-474-csos-in-myanmar-vs-telenor-asa/>.

Impartiality and avoidance of conflict of interest in the handling of specific instances

In 2023 alone, three different NCP members were replaced on four occasions by ad hoc appointees (Norwegian NCP, 2024^[20]). The NCP informs parties about the handling of a conflict of interest and assesses whether the rules under the Public Administration Act require the withdrawal of a member. NCP members and Secretariat are asked if there is any conflict of interest before commencing handling a case. When there is a clear conflict of interest, members and staff recuse themselves. If a member is unsure whether there is a conflict of interest, they are asked to submit a written statement on the potential conflict of interest, which is reviewed by the other members who take a decision on whether or not a member can participate in proceedings. The decision is documented in the minutes of the NCP meeting and parties are informed. In one case, the NCP also provided a detailed reasoning to a party who had raised a potential conflict of interest of an NCP member.

NCP members with a conflict of interest will not participate in the case at all, while Secretariat staff subject to a conflict of interest will not work on a case but can attend proceedings. In case of a conflict of an NCP member, the NCP Secretariat will request a replacement, who is appointed by the MFA based on a proposal from the respective stakeholder constituency. As this process takes time, the NCP has proposed that a standing replacement arrangement is found, e.g. by appointing deputy members.

Stakeholders express strong confidence in the NCP's impartiality. Some stakeholders highlight explicitly the fact that the Chair of the NCP is a judge as an additional factor that guarantees the NCP's impartiality. They also acknowledge that rules on conflict of interest are effectively applied in practice. Stakeholders representing complainants have also praised the NCP's efforts to provide advice and practical support to parties as a means to avoid imbalances in the proceedings.

Parallel proceedings

Parallel proceedings were a relevant consideration in a number of cases. The NCP frequently considered proceedings before courts as well as in some instances cases before NCPs, with relevance both for initial and final statements. For example:

- In 2025, the NCP did not accept a case on the basis of several considerations, including that the individual had brought the alleged violations already in front of a court.²³
- In 2019, 2022 and 2023, the NCP accepted cases, considering that the scope of the case brought before the NCP was not addressed in full by parallel court proceedings, in one instance also highlighting the assessment of the Korean NCP.²⁴
- In 2021, the NCP agreed with the Dutch and US NCP to split a submission in three separate cases, on which they co-ordinated subsequently.²⁵ In 2021, the NCP accepted a case regarding a company's operations, considering that a case against the same company it was already examining concerned a different aspect of the company's operations in the same country.²⁶
- In 2020, the NCP considered the company's compliance with a court decision in its final statement.²⁷ In 2001, the fact that a domestic court had already issued a decision in a similar case was a relevant consideration in the NCP's findings on the merits of the case.²⁸

In one instance, the NCP did not accept a specific instance, indicating amongst others the possibility of accessing a grievance mechanism at company level.²⁹ The NCP stated that it believed "that the Company should be given the possibility to examine the matters reported through its whistle blowing mechanism internally to report to the notifier on any measures taken" (Norwegian NCP, 2014_[50]). To enhance the efficiency of its case-handling, the NCP could indeed verify if both parties agree that a grievance mechanism at company level could be a suitable first option to address the grievance and only bring the case to the NCP should this fail.

An open question is the relation between the Consumer Authority's monitoring and enforcement role under the Transparency Act and the NCP as a grievance mechanism. Under the Act, the "Consumer Authority shall on its own initiative, or based on a request from others, seek to influence enterprises to comply with the Act, including by conducting negotiations with the enterprises or their organisations" (Norway, 2021_[16]). It can also issue a decision and impose penalties to enforce those or sanction repeated violations. While the Consumer Authority could simply constitute an alternative route to remedy to the NCP, it could also decide to engage with companies in cases where the NCP has made a determination of non-observance of the OECD Guidelines, or more specifically where a company is not implementing recommendations made by the NCP. It is unclear what documents submitted into a specific instance process the Consumer Authority could require access to. These issues have not yet arisen in practice. However, some business stakeholders raise the question whether the collaboration between NCP and Consumer Authority could discourage companies from engaging with the NCP and affect stakeholder trust. The binding nature of the Transparency Act might also be one explanation for companies' stronger involvement of their legal departments and more substantive submissions to the NCP. To inform potential parties to specific instances, it could therefore be useful to clarify the relation between NCP and Consumer Authority and cases of alleged non-observance of RBC standards, e.g. through a memorandum of understanding between both institutions.

Table 10. Findings and recommendations – Specific instances

	Finding	Recommendation
3.1	The NCP has been very effective in managing increasingly complex cases through both mediation and detailed examination and clear final statements. Stakeholders provide highly positive feedback to the NCP's case-handling and value its impartiality, transparency and	The NCP should improve timeliness of case handling, by <ul style="list-style-type: none"> • pursuing current efforts to set and enforce clear timelines for good offices and stepping in where appropriate • imposing limits on the length of written inputs by parties

	Finding	Recommendation
	independence. The NCP mobilises substantial resources for case-handling and enhancing accessibility for complainants. However, lengthy proceedings are a concern both for parties and the NCP, contributing also to the NCP's resource constraints.	<ul style="list-style-type: none"> • adapting the depth of initial statements and offer of good offices to the complexity of the case at hand exploring whether certain cases could – with agreement of the parties – first be dealt with by grievance mechanisms at company level.
	Updated case-handling procedures provide for greater clarity on good offices and more systematic follow-up. The procedures do not provide easily accessible information on the management of conflict of interest although internal practice is well established pursuant to the Public Administration Act. The NCP has also rejected some clearly out of scope cases without conducting an initial assessment but does not have an established procedure to do so.	The NCP should strengthen transparency and communication on its case handling by clarifying its approach to admissibility of cases in a way that does not impede accessibility, and setting out how it manages conflicts of interests.
	The Consumer Authority can assess alleged violations of obligations under the Transparency Act, issue decisions as well as penalties for enforcement. As the Transparency Act references the OECD Guidelines and the NCP collaborates closely with the Consumer Authority, this can create confusion for potential parties to specific instances. Additionally, as the NCP is subject to the Freedom of Information Act, this raises questions regarding protection of confidential information submitted into the specific instance process.	The NCP should engage with the relevant authorities to clarify the potential interaction with cases before the Consumer Authority, and its ability to ensure confidentiality under obligations under the Freedom to Information Act, and communicate transparently about this.

7 Support for government policies to promote RBC

In line with the Implementation Procedures, NCPs may support efforts by their government to develop, implement, and foster coherence of policies aimed at promoting RBC (OECD, 2023^[3]). NCPs may thus assist with implementation of the Recommendation on the Role of Government in Promoting Responsible Business Conduct (OECD, 2022^[51]). The Recommendation recognises the important role of NCPs in ensuring policy coherence for RBC, notably by facilitating co-ordination within government, disseminating information on the NCP's activities and specific instances, engaging or exchanging with other public authorities on RBC-related issues (e.g. public procurement officers, state-owned enterprise officials, trade and investment officials), and promoting stakeholder participation in the implementation, monitoring and promotion of RBC.

Such a general role in support of policymaking is not yet part of the Norwegian NCP's mandate. The NCP has therefore proposed an update of its mandate to the MFA in 2024 to reflect the updated Guidelines. At present, the mandate highlights two specific roles for the NCP regarding policymaking and policy coherence. First, on request the NCP can support and represent the government, led by the MTIF, in its engagement with the WPRBC. Second, since 2022, the NCP has a formal role to support implementation of the Transparency Act. Its mandate states: "The NCP shall contribute to a uniform interpretation of the OECD Guidelines through its cooperation with the Consumer Authority and support the different roles of the two bodies. The Consumer Authority is the guidance and supervisory authority for the Transparency Act. If there is any doubt about the practice of the Guidelines that are relevant to the Transparency Act and supervision, the NCP shall clarify with the Norwegian authorities (Ministry of Foreign Affairs, 2022^[11]).

In 2011, the NCP's structure had been revised to strengthen impartiality by reducing the role of the government. While members are appointed by the government and the Secretariat is in the MFA, the NCP operates independently and has no government representatives among its members. The NCP engages with the ministries involved in its mandate on its work through regular reporting and sharing information on specific instances. However, this does not involve other ministries of relevance to the NCP's work, first and foremost the Ministry of Children and Families, which is in charge of matters related to the Transparency Act (see Legal basis), but also the Ministry of Climate and Environment.

There is no formal requirement for consultation of the NCP or using the NCP's expertise on RBC-related policies and the NCP is not part of government co-ordination in this regard. For example, the MTIF consults with MFA, MoF and MLSI regarding preparations for the WPRBC. Consultation of the NCP is on an *ad hoc* basis. An interministerial co-ordination group on RBC under the MTIF exists but is not very active. In the past, the government also operated a stakeholder consultation body on corporate social responsibility, KOMpakt, and this body was also anticipated to act as a dialogue forum under the National Action Plan on Business and Human Rights (Government of Norway, 2015^[52]). In line with the OECD Recommendation on the Role of Government in Promoting RBC [[OECD/LEGAL/0486](#)], reviving interministerial or multi-stakeholder co-ordination mechanisms on RBC could be an opportunity to involve the full range of ministries engaged on RBC-related policies. The NCP's active participation in such mechanisms could enable it to provide its expertise and support to government policy efforts on RBC more systematically (OECD, 2023^[3]; OECD, 2022^[51]).

Recent governmental policies enabling and promoting RBC

The adoption of the Transparency Act introduced a legal obligation to carry out and account for risk-based due diligence (Norway, 2021^[16]). The Act references international human rights, labour rights and RBC standards. The Act specifies that “enterprises shall carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises”. It highlights this shall be proportionate to the enterprise’s size, context and the nature of adverse impact. The Act applies to mid-sized and larger enterprises operating in Norway fulfilling two out of three criteria: sales revenues above NOK 70 million (around USD 6.5 million), a balance sheet above NOK 35 million (around USD 3.3 million) and a minimum of 50 employees.

NCP and stakeholders highlight the major impact of the Transparency Act for the NCP’s work, increasing awareness of RBC principles and standards and concomitant demand for information and guidance from the NCP. The effects of the act were recently evaluated (Ministry of Children and Families, 2025^[53]). This evaluation also informs ongoing reflections on amendments to the Transparency Act.

The Consumer Authority is responsible for promoting respect of and enforcing the Act. It shall “seek to influence enterprises to comply with the Act”. It can use prohibitions and penalties to ensure compliance. To encourage compliance, the Consumer Authority provides significant information on the Act and RBC on its website and engages with companies. It provides information on the OECD Guidelines and Due Diligence Guidance (including promotional material in Norwegian) and the NCP itself. As set out above, it would be useful to clarify the relation between both institutions, notably regarding specific instances (see Parallel proceedings).

Based on the Agreement on the European Economic Area (EEA), EU legislation that is EEA-relevant is integrated into the agreement and becomes binding for Norway. This includes regulations relating to RBC. One example is the EU Corporate Sustainability Reporting Directive. Chapter 2 of Norway’s Accounting Act (Norway, 2025^[54]) creates an obligation for mid-sized and larger enterprises operating in Norway to report on sustainability, including information on due diligence in the value chain and potential and actual adverse impacts and their measures to address those. Norwegian stakeholders deem it possible that Norwegian legislation and notably the Transparency Act could be amended in case expectations under European legislation were to change. As member of the European Free Trade Association (EFTA), Norway is party to trade agreements that include a chapter on trade and sustainable development, e.g. with India, (EFTA/India, 2024^[55]).

Rules and practice on public procurement create specific expectations around responsible business conduct. Norway’s Public Procurement Act (Norway, 2025^[56]), requires public procurement to reduce harmful environmental impacts, promote climate-friendly solutions and promote respect for fundamental human rights.³⁰ Detailed guidance and examples are available to procurement authorities in order to promote human rights and environmental objectives through public procurement,³¹ for example for human rights (DFØ, n.d.^[57]). This also includes detailed guidance on high-risk sectors (DFØ, n.d.^[58]). The Norwegian Agency for Public and Financial Management DFØ has developed contract clauses on human rights, which are based on the OECD Guidelines (DFØ, n.d.^[59]). DFØ and Ethical Trade Norway have recently carried out a public consultation with a view to updating standardised contractual clauses and criteria for RBC in public procurement (DFØ, 2025^[60]). Strategic goals of DFØ’s 2025-2030 include furthering procurement in support of the green transition and sustainable development, although without an explicit reference to responsible business conduct (DFØ, 2025^[61]). An expert network meets regularly to exchange on RBC and public procurement. Under the “Oslo Model” for public procurement, the municipality of Oslo has established and recently revised RBC-related requirements and provided guidance with explicit reference to OECD standards (Municipality of Oslo, 2023^[62]).

RBC also plays an important role in Norway's state-ownership policy. The 2022 White Paper, entitled "Greener and more active state ownership" (Government of Norway, 2022^[63]) sets out an explicit expectation that a state-owned enterprise (SOE) "leads the field in the work on responsible business conduct" and "conducts due diligence based on recognised methods", referencing the OECD Guidelines, Due Diligence Guidance and other international standards. In addition, specific expectations relate to the respect for human rights, labour rights, environmental protection, climate change and prevention of financial crime. MTIF as the ministry responsible for state-ownership uses NCP cases to inform its ownership dialogue.

The approach to state ownership also translates into the state's role as an institutional investor. Norway's Government Pension Fund Global, the world's largest sovereign wealth fund, is managed by Norges Bank Investment Management (NBIM). NBIM's expectations vis-à-vis investees reference OECD and other international standards on RBC (NBIM, n.d.^[64]). For example, this includes specific expectations to conduct risk-based due diligence to prevent and address adverse impacts on human rights in line with the United Nations Guiding Principles (NBIM, n.d.^[65]). A Council of Ethics provides advice to Norges Bank. Its guidelines do not reference the OECD Guidelines and it does not routinely consult the NCP in its work (Ministry of Finance, 2022^[66]).³²

Export credit agency Eksfin also sets expectations related to RBC. Eksfin updated its sustainability policy in 2024 (Eksfin, 2024^[67]). The agency conducts due diligence assessments of its loan or support agreements to prevent and address adverse impacts, implementing a risk-based approach. The Policy references the OECD Guidelines as one of the international standards it is based on. Regarding human rights and marine life, the policy highlights that material risks also need to be identified within the supply chain. Eksfin website on the sustainability policy also links to Norway's NCP. The OECD Common Approaches foresee that export credit agencies "consider any statements or reports made publicly available by their National Contact Points (NCPs) at the conclusion of a specific instance procedure under the OECD Guidelines for Multinational Enterprises" (OECD, 2024^[68]), and Eksfin confirms that it does consider NCP cases. It also inquires to what extent enterprises apply the OECD Guidelines and recommends companies to take courses offered by the NCP.

Norway's trade and investment promotion agency Innovation Norway requires businesses to respect RBC to benefit from its services. A specific expectation is that companies comply with the OECD Guidelines and UNGPs (Innovation Norway, n.d.^[69]). Its 2025-2030 Sustainability Policy sets out that Innovation Norway systematically assesses environmental, social and governance impacts of potential projects and to what extent a company has policies and processes in place to address these (Innovation Norway, 2025^[70]). Companies are expected to report incidents to Innovation Norway, and a case before the NCP would be considered an incident. Moreover, Innovation Norway applies the same criteria for exclusion and investments as NBIM for the government Pension Fund Global. Innovation Norway has also proposed co-ordination meetings on RBC-related expectations among government agencies.

National Action Plan on Business and Human Rights

The NCP is part of Norway's 2015 National Action Plan on Business and Human Rights (NAP) (Government of Norway, 2015^[52]). Referencing the OECD Guidelines, the NAP highlights the NCP's work as non-judicial grievance mechanism as well as role in providing information and guidance on RBC. The NAP touches upon numerous policy areas for the promotion of RBC. These include public procurement, state ownership of enterprises, trade and investment agreements. Regarding the state's advisory role, at the time of the NAP, the government had considered establishing a service centre for businesses to advise them on human rights, bringing together different advisory bodies including the NCP. These plans have not materialised. While the NAP is formally still in force, it plays no role in the work of the NCP given its adoption a decade ago. Stakeholders have not mentioned the NAP in their feedback either.

The role of the NCP

The NCP has been actively involved in both the preparation and implementation of the Transparency Act. It provided input during the drafting of the Act, contributing to the alignment with OECD Standards under the Act (Norwegian NCP, 2020^[71]). An important input for the NCP's submission was the 2019 business survey (see Promotional plan). The survey illustrated the low levels of awareness and action of Norwegian companies, and provided an argument in support of the need for legislation (Norwegian NCP, 2020^[72]). After adoption of the Act, the NCP provided training on RBC to staff of the Consumer Authority, and later also shared advice on assessing companies' performance based on its experience from specific instances. The NCP regularly exchanges with the Authority regarding RBC, including for sharing Norway's experience at international level. Together with the Consumer Authority, the NCP conducts workshops on RBC for businesses. Despite its expertise, the NCP is not a member of the cross-government group overseeing the evaluation of the Transparency Act and its possible revision. It was, however, consulted several times during the evaluation and published its input to the consultation in writing (Norwegian NCP, 2025^[73]). The evaluation itself did not provide specific findings related to the NCP but highlighted the importance of the OECD Guidelines for the Act, while a report commissioned for the evaluation included a suggestion that the NCP could be used even more as a forum for exchange between business sectors and consumers (KPMG, 2024^[24]; Ministry of Children and Families, 2025^[53]).

While not formally set out in its mandate, the NCP has contributed to a series of legislative and policy processes on RBC. Some ministries and public agencies seek the advice of the NCP, while in other cases, the NCP learns of policy developments through public consultations, to which it then contributes with submissions. Not all ministries accept the NCP's offer of expertise. In the last five years, the NCP has provided expert contributions and participated in public hearings on (Norwegian NCP, n.d.^[74]):

- Legislation in Norway: The Transparency Act
- Development and implementation of EU legislation
 - The transposition of the EU Corporate Sustainability Reporting Directive
 - Norway's policy perspective on the draft EU Forced Labour Regulation
 - Norway's policy perspective on the draft EU Corporate Sustainability Due Diligence Directive
- Norwegian policy initiatives
 - White paper on state ownership
 - Government's action plan for sustainability
 - Revision of the Oslo model on sustainability procurement

The NCP regularly engages with and provides advice to government and public agencies. The NCP co-organises promotional and educational events that allow it to reach specific constituencies and expert groups, for example on public procurement with DFØ and the Municipality of Oslo (see Annex C). The Secretariat has provided input to MTIF on RBC related to a trade agreement and on RBC in state ownership, including a presentation at MTIF's state ownership forum on human rights and decent work. It is also in regular dialogue with Eksfin and DFØ. The NCP has also started engagement with development co-operation agency Norad and Innovation Norway on due diligence. The NCP Secretariat is consulted on an ad hoc basis regarding the WPRBC and its meetings, where the NCP Secretariat has frequently attended.

Specific instances can also raise awareness of RBC in state-owned enterprises. A number of specific instances have been directed against enterprises where the government holds a full or partial ownership, including Kongsberg Gruppen, Statkraft, Statoil/Equinor and Telenor as well as the Norwegian Government pension fund (NBIM), which have engaged with the NCP through its good offices and received recommendations and suggestions.

The NCP shares the outcomes of specific instances with the four ministries involved in oversight. Briefings can include information on the good faith engagement of parties. In addition, the NCP could also brief government agencies engaging with private sector actors, as these are already drawing on NCP cases. The NCP notes that private investors also take interest in its final statements.

Government stakeholders appreciate the NCP's engagement on policy but highlight constraints from limited resources. They highly value their collaboration with the NCP and ease of access and praise the NCP's expertise on RBC. They underline the strong collaboration with the Consumer Authority with regard to the Transparency Act. Some business stakeholders have raised concerns that the NCP's policy advice might at times exceed its role in promoting the OECD Guidelines as a voluntary standard. However, many stakeholders and the NCP itself flag that available resources and the absence of procedures for doing so do not allow the NCP to engage more systematically and widely on public policies related to RBC.

The NCP's support for government policies on RBC is affected by misperceptions about its role. A number of ministries consult the NCP through mechanisms for civil society. This does not reflect the NCP's status as a government-mandated expert body. Elevating the legal status of the NCP's mandate, involving a broader range of ministries in the process and explicitly including support for policy development in the NCP's mandate could help correct such misperceptions. Moreover, NCP Secretariat staff are employees of the MFA. It could therefore be considered to what extent they could directly participate in, or advise on, interministerial co-ordination related to RBC (OECD, 2022^[51]; OECD, 2023^[3]). However, it would need to be considered that this could lead to an increase in workload and affect stakeholder perceptions of the NCP's independence.

Table 11. Findings and recommendations – Support for government policies to promote RBC

	Finding	Recommendation
4.1	The NCP has been able to contribute to a range of regulatory and policymaking processes. Ministries draw on the NCP's advice on an ad hoc basis, and in some cases consult the NCP through mechanisms for civil society consultation, or not at all. Co-ordination mechanisms are not fully functional, impeding the NCP's role in fostering policy coherence.	Ministries should more systematically draw on the expertise of the NCP in their RBC-related policy initiatives and consider including the NCP in mechanisms for cross-government dialogue and co-ordination on RBC, as appropriate.
4.2	The NCP has good relations and collaborates with a number of ministries and governments, both for promotional activities and the design and implementation of public policies. However, this does not involve the full range of relevant institutions.	The NCP should continue to regularly engage with other relevant government departments (e.g. by communicating final statements to both ministries and government agencies for consideration in their respective areas of work; organising regular briefings on its work).

Annex A. List of organisations that submitted a response to the NCP peer review questionnaire

Table A A.1. List of organisations that submitted a response to the NCP peer review questionnaire

Name	Type of stakeholder
Ministry of Foreign Affairs	National government
Ministry of Trade, Industry and Fisheries	National government
Ministry of Children and Families	National government
Ministry of Climate and Environment	National government
Ministry of Local Government and Regional Development	National government
Innovation Norway	Public institution
Consumer Authority	Public institution
NHO	Norway-based business association
Finans Norway	Norway-based business association
Global Compact Network Norway	Norway-based business association
Equinor	Norway-based business
YS	Norway-based trade union federation
OECD Watch	International Civil Society umbrella organisation
Norwegian Forum for Development and the Environment	Norway-based Civil Society umbrella organisation
Amnesty International Norway	Norway-based civil society organisation
Pax	Netherlands-based civil society organisation

Annex B. List of organisations that participated in the NCP peer review on-site visit

Table A B.1. List of organisations that participated in the NCP peer review on-site visit

Business
The Confederation of Norwegian Enterprise (NHO)
The Federation of Norwegian Enterprise (Virke)
Finance Norway
UN Global Compact
DNB
Strawberry
Aker
NBIM
Telenor
Equinor
NorgesGruppen
BIAC
Trade unions
Norwegian Confederation of Trade Unions (LO)
Styrke
The Confederation of Vocational Unions (YS)
The United Federation of Trade Unions (Fellesforbundet)
International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Worker's Associations (IUF)
TUAC
CSOs
Forum for Development and Environment (ForUM)
Amnesty International Norway
Future in Our Hands
Norwegian Peoples Aid
Ethical Trade Norway
Fairtrade Norway
Rafto Foundation / Future Proof
Norwegian National Human Rights Institution (NIM)
Sami Council
Norwegian Bar Association
PAX
SOMO
OECD Watch
Government
Ministry of Foreign Affairs
Ministry of Trade, Industry and Fisheries

Ministry of Finance
Ministry of Children and Family Affairs
Ministry of Climate and Environment
Ministry of Local Government and Regional Development
Consumer Authority
Innovation Norway
Norwegian Agency for Public and Financial Management (DFØ)
Eksfin
Norad
Norfund
Government Pension Fund Global – Council on Ethics

Annex C. Promotional events

Table A C.1. Promotional activities in 2024 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
EU CSDDD – a watershed for responsible business conduct?	08-May-2024	Oslo	>100	Organised	Business NGOs Trade Unions Academia Government
Workshop on the Transparency Act and Responsible Business Conduct	29-May-2024	Kristiansand	10-50	Co-organised	Business
Workshop on the Transparency Act and Responsible Business Conduct	05-Jun-2024	Trondheim	10-50	Co-organised	Business
Best practices and challenges: Human rights in supply chains	08-Oct-2024	Virtual	50-100	Co-organised	Business
Lecture: The Guidelines and the NCP	29-Oct-2024	Oslo	10-50	Co-organised	Other, high school students
Workshop on the Transparency Act and Responsible Business Conduct	31-Oct-2024	Bergen	10-50	Co-organised	Business
Workshop on the Transparency Act and Responsible Business Conduct	06-Nov-2024	Oslo	10-50	Co-organised	Business
Advanced workshop on the Transparency Act and Responsible Business Conduct	14-Nov-2024	Oslo	10-50	Co-organised	Business
Human rights Due Diligence – what are the expectations of Norwegian companies?	13-Dec-2024	Oslo / Webinar	>100	Co-organised	Business

Source: NCP Reporting Questionnaire (2025)

Table A C.2. Promotional activities in 2024 participated in by the NCP

Title	Date	Location	Size of audience	Organiser	
Young in Compliance	24-Jan-2024	Oslo	10-50	Law firms Wiersholm and Selmer	Other, young lawyers
Training on the Guidelines and the Norwegian Transparency Act	30-Jan-2024	Oslo	10-50	KNIF	NGOs
Due diligence under the Norwegian Transparency Act	30-Jan-2024	Oslo	10-50	Arntzen de Besche (law firm)	Business Other, lawyers
Engaging Supervisory Authorities	30-Jan-2024	Virtual	10-50	Danish Institute for Human Rights	Government Other, NRHIs
The Norwegian Transparency Act and other regulatory development	20-Feb-2024	Oslo	10-50	University of Oslo	Academia Other, students
Course on the Transparency Act and Due Diligence	28-Feb-2024	Oslo	10-50	Haavind (law firm)	Business
Iceland-OECD Workshop: Policy Coherence for Sustainable Development	10-Apr-2025	Virtual	10-50	Office of Prime Minister of Iceland, MFA Iceland, OECD	Business Other, lawyers, consultants
Living wages and decent work	10-Apr-2025	Oslo	50-100	KPMG	Business Other, lawyers, consultants
Executive Master Course	12-Apr-2024	Oslo	10-50	NHH (Business School)	Business Academia
Nordic-Baltic NCP network	14-May-2025	Tallinn	10-50	NCP Estonia	Government Other, Nordic & Baltic NCPs
The role and responsibility of business in the face of violations of international law: what must, should and can business do?	28-May-2024	Bergen	50-100	Future-Proof (Bergen Chamber of Commerce and the Rafto Foundation)	Business NGOs Academia
The Transparency Act	06-Jun-2024	Virtual	50-100	EBA (Business Association of construction companies)	Business
The Transparency Act and Global Trade	20-Jun-2024	Stavanger	10-50	Rafto Foundation	Business NGOs
Implications of the Transparency Act for Women's Human Rights	12-Aug-2024	Arendal	10-50	FOKUS – Forum for Women and Development	Business NGOs Trade Unions Academia Government
Norwegian business and DD in conflict areas	13-Aug-2024	Arendal	10-50	Save the Children / Ethical Trade Norway	Business NGOs Trade Unions Academia Government

Title	Date	Location	Size of audience	Organiser	
What responsibility should companies have in Norwegian arms exports?	13-Aug-2024	Arendal	10-50	Changemaker (NGO youth organisation)	Business NGOs Trade Unions Academia Government
The Transparency Act – Two years later	29-Aug-2024	Oslo	50-100	Coalition for Responsible Business Conduct (KAN)	Business NGOs Trade Unions Academia Government
Seminar for suppliers	19-Sep-2024	Oslo	10-50	Posten (public mail service)	Business
Course for foreign service trainees	24-Sep-2024	Oslo	10-50	Ministry of Foreign Affairs	Government
Business and Human Rights Course	06-Oct-2024	Virtual	50-100	IHRB and Rafto Foundation	Academia
Green Procurement	29-Oct-2024	Oslo	50-100	Skift – business climate leaders	Business
Nordic Stakeholders Breakfast Roundtable: Promoting Effective Human Rights Due Diligence by businesses	26-Nov-2024	Geneva	50-100	UN delegations of Norway and Denmark, Ethical Trade Norway, Danish Institute for Business and Human Rights	Business NGOs Trade Unions Academia Government

Source: NCP Reporting Questionnaire (2025)

Table A C.3. Promotional activities in 2023 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Launch of annual report, including dialogue with the NCP's stakeholders and a panel discussion on RBC in a context of war, conflict and insecurity	19-Apr-2023	Oslo	50-100	Organised	Business NGOs Trade Unions Academia Government Other, please specify: consultants
Launch of business survey	12-Jun-2023	Oslo	50-100	Organised	Business NGOs Trade Unions Academia Government Other, please specify: consultants
OECD's brand new GL: What is new?	15-Aug-2023	Arendal	50-100	Organised	Business NGOs
The Transparency Act, sustainability and RBC	30-31-Aug-2023	Førde and Sogndal	50-100	Co-organised with local chambers of commerce and industry	Business
What is the effect of the transparency act so far?	11-Oct-2023	Oslo	50-100	Co-organised with Norwegian Business School	Business NGOs Trade Unions Academia Government

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
					Other, please specify: consultants
Human rights in the green transition	19-Oct-2023	Oslo	10-50	Co-organised with Norwegian NHRI	Business
The Tromsø region meets the EU: the sustainability journey of the North	02-Nov-2023	Tromsø	50-100	Co organised with Troms Chamber of Commerce, Tromsø municipality, LUP – Innovative Procurements	Business NGOs Trade Unions Academia Government Other, please specify: consultants
Course in the Transparency Act and RBC	21-Nov-2023	Tromsø	10-50	Co-organised with the Norwegian Consumer Authority	Business
Course in the Transparency Act and RBC	12-Dec-2023	Stavanger	50-60	Co-organised with the Norwegian Consumer Authority and the Rafto Foundation / Future Proof	Business Other, please specify: consultants
Conference on RBC – the updated OECD GL	14-Dec-2023	Oslo	170	Co-organised with the Ministry of Trade, Industry and Fisheries, Confederation of Norwegian Enterprise, Norwegian Confederation of Trade Unions	Business NGOs Trade Unions Academia Government Other, please specify: consultants

Source: NCP Reporting Questionnaire (2024)

Table A C.4. Promotional activities in 2023 participated in by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
People. Planet. Profit.	12-Jan-2023	Oslo	10-50	Sustainability Network no. 17	Business Other, please specify: public sector
The Transparency Act unpacked	19-Jan-2023	Oslo	50-100	Designit Oslo	Business NGOs Other, please specify: designers, consultants
Competence forum	25-Jan-2023	Oslo	50-100	The Ministry of Trade, Industry and Fisheries, Ownership department	NGOs Government
Due diligence	31-Jan-2023	Oslo	130	Virke, Federation of Norwegian Enterprise	Business
Risk mapping and stakeholder engagement	10-Mar-2023	Bergen	10-50	Future-Proof (Bergen Chamber of Commerce and the Rafto Foundation)	Business

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
The Bar Association's Human Rights Seminar	19-Apr-2023	Oslo		The Bar Association	Other, please specify: lawyers
The Transparency Act	15 – May – 2023	Oslo	50	Econa (employer organisation for economists)	Business Other, please specify: consultants
Nordic Baltic Network Meeting	22-23-May-2023	Reykjavik	10-50	NCP Iceland	Other, please specify: NCPs
The Transparency Act	30-May-2023	Oslo	600	The Norwegian Consumer Authority	Business Other, please specify: consultants
Breakfast meeting: Social sustainability	31-May-2023	Oslo	10 – 50	Henning Larsen (Scandinavian architecture company)	Business Other, please specify: consultants
The Transparency Act	06-Jun-2023	Oslo	250	Spekter (employer organisation)	Business
Human rights in the green transition	13-Jun-2023	Oslo	10-50	Coalition for RBC	Business NGOs
Sustainability fairytale	19-Jun-2023	Oslo	1 100	Podcast by two professors at Norwegian School of Economics	Business NGOs Academia
One year with the Transparency Act: what have learned and what is good practice?	15-Aug-2023	Arendal	120	Ethical Trade Norway	Business NGOs Other, please specify: consultants
Knowledge of and Work with the OECD GL for RBC among Norwegian Business Leaders	16-Aug-2023	Oslo	10-50	Norwegian Centre for Human Rights, University of Oslo	Academia
Promoting the OECD Guidelines in Norway	17-Aug-2023	Oslo	10-50	Norwegian Centre for Human Rights, University of Oslo	Academia
OECD Guidelines and due diligence	29-Aug-2023	Førde	10-50	Norec- Norwegian Agency for Exchange Co-operation	Other, please specify: Norec staff
Intensive Course in Human Rights	07-Sep-2023	Oslo	10-50	Norwegian Centre for Human Rights, University of Oslo	Academia
The Transparency Act and the OECD Guidelines for MNEs	08-Sep-2023	Oslo	200	Gyldendal (publishing company)	
Course for foreign service trainees	27-Sep-2023	Oslo	10-50	Ministry of Foreign Affairs	Government
Master course: Business and Human Rights	10-Oct-2023	Bergen	50	University of Bergen	Academia
Virtual Summit: Advancing workers' rights in public buyers' supply chains: the potential of the new regulatory environment	14-Nov-2023	Oslo	50-100	Electronics Watch	Business Government
Sustainable value chains	16-Nov-2023	Oslo	10-50	PwC	Business

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
					Other, please specify: consultants
Due diligence	27-November-2023	Oslo	10 – 50	Lawyers' Centre of Education (Juristenes utdanningscenter)	Business Other, please specify Lawyers
Sustainability Reporting	28-Nov-2023	Oslo	300	Academy for Sustainability Reporting (Collaboration between: The Norwegian Institute of Public Accountants, KPMG, BDO, Deloitte, EY and PwC)	Business Other, please specify: consultants, accountants
OECD Guidelines and the Transparency Act	12-Dec-2023	Oslo	<10	NITO (Norwegian Society of Engineers and Technologists)	Trade Unions

Source: NCP Reporting Questionnaire (2023)

Table A C.5. Promotional activities in 2022 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Course in RBC and due diligence	17-Mar-2022	Oslo	10-50	Organised	Business representatives
Dialogue meeting and launch of annual report, including panel discussion on the Transparency Act.	25-Apr-2022	Oslo	50-100	Organised	Business representatives NGOs Trade Unions Academia Government
Course in RBC and due diligence	05-May2 022	Porsgrunn	10-50	Organised	Other, please specify
Course in RBC and due diligence	23-May2 022	Porsgrunn	10-50	Organised	Other, please specify
Launch compilation of dilemmas	19-Sep2 022	Oslo	50-100	Co-organised	Business representatives NGOs Trade Unions

Source: NCP Reporting Questionnaire (2023).

Table A C.6. Promotional activities in 2022 participated in by the NCP

Title	Date	Location	Size of audience	Organiser	Target audience
Delivering Human Rights and Environmental Due Diligence in Public Procurement	25-Jan-2022	Webinar	50-100	Electronics Watch, IndustriAll, Fair Trade Advocacy Office og Rethinking Value Chains	Business representatives NGOs Trade Unions
Future Proof workshop for managers	26-Jan-2023	Bergen	10-50	Bergen Chamber of Commerce and	Business representatives

Title	Date	Location	Size of audience	Organiser	Target audience
				Industry, Rafto Foundation for Human Rights	
Preparing for the Norwegian Transparency Act	15-Feb-2022	Online	10-50	Sustainability Hub	Business representatives Academia
Competence Forum	02-Mar-2022	Oslo	10-50	Ministry of Trade and Fisheries	NGOs Trade Unions Government
The Transparency Act	11-Mar-2022	Oslo	>100	Union of contractors – Building and Construction	Business representatives
What does the Transparency Act imply for enterprises?	01-Apr-2022	Oslo	50-100	Norwegian Association of Lawyers	Other, lawyers
Delivering Due Diligence – bridging policy and practice	12-Apr-2022	Brussels	>100	Responsible Business Alliance	Business representatives NGOs Government
Nordic-Baltic Network	20-May2 022	Stockholm	10-50	Swedish NCP	Other, NCPs
Get started	09-Jun-2022	Oslo	10-50	Coalition for Responsible Business Conduct (KAN)	Business representatives NGOs Trade Unions
Future Proof Workshop	09-Jun-2022	Bergen	10-50	Bergen Chamber of Commerce and Industry, Rafto Foundation for Human Rights	Business representatives
Human rights in the garden	14-Jun-2022	Oslo	Choose an item.	Norwegian National Human Rights Institution	Business representatives NGOs Trade Unions Academia Government
Presentation of the OECD GL, due diligence and the Transparency Act	21-Jun-2022	Oslo	10-50	Export Finance Norway	Other, employees at Eksfin
OECD Roundtable for policymakers	23-Jun-2022	Webinar	50-100	OECD Centre for Responsible Business Conduct	Government
The Transparency Act – how to make a difference	17-Aug2 022	Arendal	Choose an item.	Arendalsuka	Business representatives NGOs Trade Unions Academia Government
Workshop on RBC	09-Sep2 022	Oslo	10-50	Innovation Norway	Business representatives
Master course in human rights	15-Sep2 022	Oslo	10-50	University of Oslo	Academia

Title	Date	Location	Size of audience	Organiser	Target audience
Annual course in human rights	22-Sep2 022	Oslo	10-50	Lawyers Education Centre	Other, lawyers
Course for foreign service trainees	23-Sep2 022	Oslo	10-50	Ministry of Foreign Affairs	Other, foreign service trainees
Grievance mechanisms and OECD NCPs	10-Oct-2022	Webinar	10-50	Business for Inclusive Growth	Business representatives
Transparency Act and Norwegian labour law	20-Oct-2022	Oslo	10-50	Norwegian Association of Labour Legislation	Other, lawyers
World Conflict Resolution Day	20-Oct-2022	Webinar	50-100	Peace Nexus, CAO	Other, NCPs, mediators
Follow-up Myanmar	03-Nov2 022	Oslo	10-50	Ethical Trade Norway	NGOs Trade Unions
Future Proof Workshops	23-Nov2 022	Bergen	10-50	Bergen Chamber of Commerce and Industry, Rafto Foundation for Human Rights	Business representatives
The Turkish Embassy	26-Jan-2023	Oslo	10-50	The Turkish Embassy, Forum for Women and Development	Business representatives NGOs Government
UN Forum for Business and Human Rights	29-Nov2 022	Geneva	>100	UN Working Group on BHR	Business representatives NGOs Trade Unions Academia Government
The Transparency Act and Responsible Business Conduct	07-Dec2 022	Skien	>100	The Consumer Authority	Business representatives NGOs Trade Unions Academia Government
Accountability for forced labour and modern slavery	09-Dec2 022	Oslo	>100	University of Oslo	Business representatives NGOs Trade Unions Academia Government
The Transparency Act and the OECD Guidelines	09-Dec2 022	Oslo	>100	Norwegian ILO Committee	Business representatives Trade Unions Government

Source: NCP Reporting Questionnaire (2023).

Table A C.7. Promotional activities in 2021 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Dialogue meeting and launch of annual report, incl panel discussion on sustainable finance	26-Apr-2021	Oslo	50-100	Organised	Business representatives, NGOs, trade unions, academia, government

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
					representatives, general public
The Transparency Act: A milestone for human rights and sustainability	19-Aug2 021	Arendal	50-100	Co-organised	Business repr, NGOs, trade unions, academia, general public
Course in RBC and due diligence 1	19-Oct-2021	Oslo	10-50	Organised	Business representatives
Seminar: the OECD complaint mechanism	01-Nov2 021	Oslo	50	Organised	Business representatives, NGOs, Academia, Trade unions
Course in RBC and due diligence 2	22-Nov2 021	Oslo	10-50	Organised	Business representatives

Source: NCP Reporting Questionnaire (2022).

Table A C.8. Promotional activities in 2021 participated in by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
How to follow up, monitor and report on human rights?	21-Jan-2021	Bergen	10-50	Bergen Chamber of Commerce and Industry, Rafto Foundation	Business repr.
Renewable energy and indigenous peoples' rights	02-Feb-2021	Denmark	10-50	The Danish Institute for Human Rights	Business representatives, NGOs
Responsible supply chains	02-Feb-2021	Oslo	>100	KPMG	Business representatives
The Confederation of Norwegian Enterprise (NHO) Sustainable Forum	10-Feb-2021	Oslo	10-50	NHO	Business representatives
Business far away – Role, Dilemma and Challenges	18-Mar-2021	Oslo	50-100	Nobel Peace Center	Business repr., NGOs, academia, general public
Requirements and expectations in anti-corruption work in the defence sector	13/042 021	Oslo	10-50	Defence Forum	Business repr.
Expert meeting on the HR impacts of Nordic investments in renewable energy	27-Apr-2021	Denmark	50-100	The Danish Institute for Human Rights	Business repr., NGOs, HRI, financial sector
How to comply with requirements on ethical trade from marked and authorities	29 April 2021	Oslo	50-100	Ethical Trade Norway	Business repr.
Reporting on human rights and supply chains	29 April 2021	Oslo	10-50	Sustainability Hub (network for sustainable supply chains)	Business repr., NGOs

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
New RBC requirements	03 May 2021	Oslo	10-50	City of Oslo	Oslo City Government, public procurers in the municipality
Nordic Baltic NCP Network meeting	12 May 2021	Copenhagen	50-100	Denmark NCP	Nordic-Baltic NCPs
Democracy and inclusion in Oslo Science City	19 May 2021	Oslo	10-50		Business representatives, academia, public sector
Course: RBC in the Chinese market	20 May 2021	Oslo	10-50	The Confederation of Norwegian Enterprise	Business representatives
Global social sustainability	26 May 2021	Oslo	10-50	Norwegian Green Building Council	Building and estate sector
Business conference on internationalisation and development	01 June 2021	Oslo	>100	The Confederation of Norwegian Enterprise, Innovation Norway	Business representatives, authorities
Future proof seminar	02 June 2021	Bergen	10-50	Bergen Chamber of Commerce and Industry, Rafto Foundation	Business representatives, academia
International Commission of Jurists (ICJ)	08 June 2021	Oslo	50	ICJ	Business representatives, academia, lawyers, NGOs
Course: RBC in the Chinese market	09 June 2021	Oslo	10-50	The Confederation of Norwegian Enterprise	Business representatives
OECD Global Forum: side session	15-17 June 2021	Paris	50	OECD	
Internal seminar, Ministry of Trade, Industry and Fisheries	02 September 2021	Oslo	<10	The ministry's ownership department	Authorities
Ministry of Foreign Affairs: Preparatory course for embassy employees	08 September 2021	Oslo	10-50	MFA	MFA employees
OECD's stocktaking process and the new Transparency Act	09 September 2021	Oslo	10	Forum for Development and Environment	NGOs
University of Oslo, Norwegian Centre for Human Rights	16 September 2021	Oslo	10-50	Norwegian Centre for HR	Academia
Sustainability Hub (network for sustainable supply chains)	20 September 2021	Oslo	50	S-Hub, Ethical Trade Norway	Business representatives
Forum for the main bar associations	22 September 2021	Oslo	50	The Norwegian Bar Association	Lawyers
Webinar for procurers and enterprises	28 September 2021	Oslo	>100	The Norwegian Agency for Public and Financial Management	Procurers, business representatives

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Seminar for foreign service trainees	06 October 2021	Oslo	10-50	Ministry of Foreign Affairs	Trainees, government representatives
Just Add Finance – social sustainability	03 November 2021	Oslo	>100	Finance Sector Union of Norway	Finance sector
Oslo Compliance Forum: RBC	05 November 2021	Oslo	>100	Wiersholm law firm	Lawyers
Globalisation Conference: responsible garment industry	20 February 2021	Oslo	10-50	Future in our hands	NGOs, students
OECD NCP Network Meeting	25 November 2021	Paris	50-100	OECD	NCPs
Transparency Act	29 November 2021	Oslo	>100	Amnesty Int. Norway	Business repr, NGOs
Conference: Transparency Act	03 December 2021	Oslo	>100	Ministry of Trade and Fisheries; Ministry of Foreign Affairs; Ministry of Children and Families	Business repr., NGOs, academia, trade unions, government repr.
'Protect, respect and remedy: In memory of John G. Ruggie (1944 – 2021)' – Oslo Peace Days	07 December 2021	Oslo	10-50	Norwegian Centre for Human Rights	Academia
Transparency Act, OECD Guidelines and Reporting	08 December 2021	Oslo	50-100	UN Global Compact Norway	Business representatives

Source: NCP Reporting Questionnaire (2022).

Table A C.9. Promotional activities in 2020 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Meeting for relevant ministries on the NCP's final statement in a specific instance	3 Feb 2020	Oslo	10-50	Organised	Government representatives
Dialogue meeting and launch of annual report	28 April 2020	Oslo	50-100	Organised	Business representatives, NGOs, trade unions, academia, government representatives, general public
Launch of business survey on OECD GL and due diligence	23 June 2020	Oslo	50-100	Co-organised	Business representatives, NGOs, trade unions, academia, government representatives, general public

Meeting for relevant ministries on the NCP's initial assessment in a specific instance	28 October 2020	Oslo	10-50	Organised	Government representatives
Workshop in RBC	7-8 December 2020	Oslo	50-100	Organised	Public agencies that provide economic support or services to business, government representatives

Source: NCP Reporting Questionnaire (2021).

Table A C.10. Promotional activities in 2020 participated in by the NCP

Title	Date	Location	Size of audience	Organiser	Target audience
The value of respect for human rights in public and private investments	31 January 2020	Oslo	50-100	Ministry of Foreign Affairs	Government representatives
Foreign trade mission to Kenya, preparation meeting	6 February 2020	Oslo	10-50	Innovation Norway	Business representatives
Can aid to private sector contribute to sustainable development?	7 February 2020	Oslo	50-100	Norad	Business representatives, NGOs, trade unions, government representatives, public agencies that provide economic support or services to business
Civil Society and the Private Sector, RBC, Norad	12 February 2020	Oslo	10-50	Norad	Government repr.
Responsible labour in maritime supply chains	13 February 2020	Oslo	10-50	Ministry of Trade and Fisheries	Business repr., public agencies that provide economic support or services to business
Presentation of Norway NCP, NCP complaint mechanism and mediation	5 March 2020	Oslo	10-50	The National Mediator of Norway	Mediators
Proposal for an Act regulating Enterprises transparency about supply chains, duty to know and due diligence	11 March 2020	Oslo	10-50	NHRI and Norway NCP	Business representatives, academia, NGOs, Trade unions
Business forum on sustainable development	23 April 2020	Oslo	10-50	Confederation of Norwegian Enterprise	Business repr.

Title	Date	Location	Size of audience	Organiser	Target audience
OECD Global Forum	19 May 2020	Paris	>100	OECD WPRBC	Business representatives, NGOs, trade unions, academia, government representatives, general public, NCPs
NCP network meeting	18-19 June 2020	Paris	50-100	OECD WPRBC	NCPs
Forum week on business and sustainable development	13 August 2020	Arendal	10-50	Global Compact Norway	Business representatives, NGOs, government representatives
Business and human rights	10 September 2020	Vilnius	>100	NCP Lithuania	Business representatives, government representatives in Lithuania
Master course in Business and Human Rights	20 September 2020	Bergen	10-50	University of Bergen, Rafto Foundation, Institute for Human Rights and Business	Students
Consultation meeting for stakeholders on govt action plan for the SDGs	25 September 2020	Oslo	10-50	Ministry of Local Government and Modernisation	Government representatives
Course for foreign service trainees	7 October 2020	Oslo	10-50	Ministry of Foreign Affairs	Foreign service trainees
20th anniversary conference for Ethical Trade Norway	21 October 2020	Oslo	>100	Ethical Trade Norway	Business representatives, NGOs, trade unions, academia, government representatives
Forum for business and human rights	29 October 2020	Bergen	10-50	Bergen Business Council, Rafto Foundation	Business representatives, NGOs
Information meeting about NCP Norway	27 November 2020	Oslo	<10	Forum for Development and Environment	NGOs
Human rights and business	2 December 2020	Bergen	10-50	Bergen Business Council, Rafto Foundation	Business board members
Forum about Proposal for an Act regulating Enterprises' transparency about supply chains, duty to know and due diligence	2 December 2020	Oslo	10-50	Ministry of Trade and Fisheries	Government representatives, NGOs, trade unions, business representatives
Meeting in Committee for Norway towards 2025	2 December 2020	Oslo	10-50	Committee for Norway towards 2025	Government representatives
Meeting in the Norwegian ILO Committee	9 December 2020	Oslo	10-50	Ministry of Labour and	Business representatives,

Title	Date	Location	Size of audience	Organiser	Target audience
				Social Affairs	NGOs, trade unions, government representatives
OECD: 20th anniversary of NCPs	14 December 2020	Paris	>100	OECD WPRBC	Business representatives, NGOs, trade unions, government representatives, NCPs
Meeting in inter-ministerial working group on proposal for an Act regulating Enterprises' transparency about supply chains, duty to know and due diligence	15 December 2020	Oslo	10-50	Ministry of Children and Families	Government representatives

Source : NCP Reporting Questionnaire (2021).

Annex D. Overview of specific instances handled by the NCP as the leading NCP

Table A D.1. Overview of specific instances handled by the NCP as the leading NCP

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
1	Gard	International Transport Workers' Federation	Philippines, Indonesia	V	01-10-2002	N/A		Concluded	Final statement concluding that the enterprise had not violated the OECD Guidelines by respecting labour relation practice in the host country.	No
2	Aker Kværner	Forum for Development and the Environment	Cuba	IV	20-06-2005	N/A	29-11-2009	Concluded	Final statement encouraging the company to develop ethical guidelines for its activities and assess their commitments in relation to human rights, in particular in contexts such as the Guantanamo Bay detention facilities.	No

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
3	Kongsberg Automotive	Norwegian Confederation of Trade Unions	United States	V	25-11-2008	N/A	28-05-2009	Concluded	Final statement with majority and minority opinion. The majority found no violation of the guidelines from the use of hired labour during a labour dispute but recommended the enterprises to engage with its subsidiary on labour rights.	No
4	Intex Resources ASA	Future in Our Hands (NGO)	Philippines	II, VI, VII	26-01-2009	N/A	30-11-2011	Concluded	Final statement concluding that the enterprise had not acted in line with the OECD Guidelines, including by not consulting adequately with all potentially affected indigenous groups in its mining operations.	No
5	Cermaq ASA	Friends of the Earth Norway and Forum for Environment Development (NGOs)	Chile	II, IV, VI	19-05-2009	N/A	10-08-2011	Concluded	Mediation concluded with a joint statement, notably on mechanisms to assess and address environmental and social impacts of aquaculture.	No
6	Norwegian Church Aid (NCA)	Dianne Post	Kosovo	II, IV, VI	22-06-2011	27-11-2011	27-11-2011	Not accepted	Rejected as the complaint was not directed at an enterprise.	No
7	Statoil ASA	Norwegian Climate Network	Canada	VI	28-11-2011	13-03-2012	13-03-2012	Not accepted	Rejected as the complaint was directed	No

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
		and Concerned Scientists Norway							at Canada's policies rather than the enterprise's actions.	
8	Sjovik A.S.	Norwegian Support Committee for Western Sahara	Western Sahara	IV	05-12-2011	08-03-2012	02-07-2013	Concluded	Mediation concluded with a joint statement, notably on mechanisms to assess and address environmental and social impacts of fisheries activities.	15-05-201 4
9	NBIM	NGOs (Lok Shakti Abhyan (India), Korean Trans National Corporation Watch (South Korea), Fair Green Global Alliance (Netherlands), and ForUM (Norway)	India	II, III, IV, VI	17-10-2012	27-11-2012	27-05-2013	Concluded	Final statement finding the enterprise had not acted in line with the OECD Guidelines, providing recommendations to strengthen due diligence as an institutional investor.	No
10	N/A	N/A	N/A	VII	07-03-2014	18-06-2014	18-06-2014	Not accepted	Anonymous and unsubstantiated complaint	No
11	Norpower	FIVAS	Malaysia	II, III, IV	22-08-2014	06-01-2015	23-06-2015	Concluded	Mediation concluded with a joint statement, including commitments to ensure due diligence, connected to a case on hydropower projects.	10-11-201 6
12	Crown Holdings International and Norges Bank Investment Management (NBIM)	United Steel Workers and Birlsiek Metal IS	Norway	IV	10-11-2014	02-07-2015	02-07-2015	Not accepted	Initial assessment considered that new examination of NBIM so shortly after the last instance would not contribute to the	No

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
									purpose of the OECD Guidelines	
13	Norges Bank Investment Management (NBIM) and Daewoo	Cotton Campaign, Anti-Slavery International and KTNC Watch	Norway	IV	03-12-2014	02-07-2015	02-07-2015	Not accepted	Initial assessment considered that new examination of NBIM so shortly after the last instance would not contribute to the purpose of the OECD Guidelines	No
14	DNO ASA	DNO Yemen Union	Yemen	I, V	08-11-2016	02-05-2017	09-04-2018	Concluded	Mediation not successful. Final statement of the NCP found the enterprise had not respected some provisions of the OECD Guidelines regarding notification and consultation on changes in operations.	No
15	DNO ASA	Industri Energi, and the Co-ordination Council of DNO Yemen labour union	Yemen	I, V	12-09-2018	17-01-2019	10-02-2020	Concluded	Enterprises declined good offices, pointing to similarity with previous complaint. Final statement found that the enterprise had not failed to comply with the OECD guidelines but recommended engagement with the NCP mechanisms.	No
16	Total, Total E&P Norge, Equinor and TechnipFMC	KTNC Watch and Samsung Heavy Industries Martin Linge Project Crane Accident	Korea, Norway	III, IV	20-03-2019	13-05-2020	22-02-2023	Concluded	Mediation not successful. Final statement of the NCP found enterprise was directly linked to the	18-12-2024

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
		Workers Support Team							adverse impact via its Korean business partner. It recommended due diligence and stakeholder engagement; leverage and remedy; and disclosure.	
17	Telenor	Committee Seeking Justice for Alethankyaw (CSJA)	Myanmar	II, IV	19-12-2019	28-10-2020	29-08-2022	Concluded	Final statement finding general respect for OECD Guidelines through due diligence, with recommendations to strengthen stakeholder engagement and exploring a role in remediation.	No
18	Norges Bank Investment Management (NBIM)	International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF), European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT-IUF), Service Employees International Union (SEIU) and União Geral dos	Australia, Brazil, Chile, Colombia, France, the United Kingdom, the United States	II, IV	18-05-2020	21-06-2021	22-04-2022	Concluded	Joint statement of parties following mediation, concerning the role of institutional investors vis-à-vis investees, connected to alleged violations of worker rights and gender-based violence and harassment.	27-10-2022

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
		Trabalhadores (UGT)								
19	Telenor ASA	Center for Research on Multinational Corporations (SOMO) on behalf of 474 civil society organisations in Myanmar	Myanmar	II, III, IV	27-07-2021	27-09-2021		Ongoing	Memorandum of Understanding between both parties on mediation, allegations concern inadequate due diligence around responsible disengagement.	N/A
20	Aker BP ASA, Aker ASA	PAX and others	Norway, South Sudan	II, IV	31-05-2022	27-02-2023	18-06-2025	Concluded	Mediation not successful. Final statement makes determination on non-compliance and recommends the company to carry out due diligence regarding a merger with another company, and alleged violations of RBC standards of this company.	Foreseen
21	Statkraft AS	Aylla Rewe of the Ngen Mapu Kintuantü and ancestral authorities, the Machi Millaray Huichalaf, spiritual authority of the Mapuche people, and the council of lonkos on behalf of a wide range of Mapuche-Williche	Chile	I, II, III, IV, VI	14-09-2023	19-09-2024		Ongoing	Allegations regarding Indigenous Peoples' rights, land rights and environmental protection related to development of three hydro-power plants.	N/A

	Enterprise	Submitter	Host Country/ Territory	Chapter(s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
		communities in the Pilmayken territory, Southern Chile								
22	N/A	N/A	N/A	II, IV, V	01-01-2025	15-05-2025	N/A	Not accepted	Rejected as individual workplace issue and ongoing parallel proceedings.	N/A
23	Telenor Pakistan / Telenor ASA	Individual	Pakistan	IV, V	28.5.2025	7.11.2025	7.11.2025	Not accepted	Rejected as individual workplace issue, not contributing to the purposes and effectiveness of the OECD Guidelines	N/A
24	Orkla Latvia / Orkla Snacks	Individual	Latvia	II, IV, V, VII	12.5.2025	21.11.2025	21.11.2025	Not accepted	Rejected as individual workplace issue, not contributing to the purposes and effectiveness of the OECD Guidelines	

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Notes

¹ Two ongoing complaints were concluded in November 2025, both rejected.

¹ Two ongoing complaints were concluded in November 2025, both rejected.

² See the 2017 MCM Council Statement: <https://web-archive.oecd.org/2017-06-12/442001-2017-ministerial-council-statement.htm>.

³ See <https://responsiblebusiness.no/protokoller-fra-kontakpunktets-moter/>.

⁴ See the evaluation of the Consumer Price Index here: <https://www.ssb.no/en/priser-og-prisindekser/konsumpriser/statistikk/konsumprisindeksen>.

⁵ See <https://responsiblebusiness.no/rapportering-og-planer/#%C3%A5rlig-rapportering-til-oecd>.

⁶ See <https://responsiblebusiness.no/en/unique-grievance-mechanism/specific-instances-handled-in-norway/>.

⁷ See <https://responsiblebusiness.no/protokoller-fra-kontakpunktets-moter/>.

⁸ Business awareness surveys had already been conducted earlier in 2011, 2012 and 2013, https://www.regjeringen.no/globalassets/upload/ud/vedlegg/ncp/guidelines_survey.pdf.

⁹ The NCP also published a translation of the 2023 update of the OECD Guidelines in November 2025.

¹⁰ See <https://www.responsiblebusiness.no>.

¹¹ See <https://www.linkedin.com/company/norges-oecd-kontaktpunkt-for-ansvarlig-n%C3%A6ringsliv>.

¹² Two ongoing complaints were concluded in November 2025, both rejected.

¹³ See 7Annex D, specific instances no. 5, 8, 11 and 18.

¹⁴ See 7Annex D, specific instances no. 1, 2, 3, 4, 9, 14, 15, 16, 17, and 20.

¹⁵ See 7Annex D, specific instances no. 8, 11, 16, 18, and 20.

¹⁶ The identity of the party concerned and its interest in the matter: Whether the issue is material, i.e. relevant to the implementation of the Guidelines and substantiated, i.e. supported by sufficient and credible information: 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 contribute to the resolution of the issue

and/or the implementation of the Guidelines; and whether the examination of the issue would contribute to the purposes and effectiveness of the Guidelines.

¹⁷ An additional two specific instances were rejected in November 2025.

¹⁸ See 7Annex D, specific instances no. 12, 13 and 22.

¹⁹ See 7Annex D, specific instances no. 6 and 7.

²⁰ See 7Annex D, specific instance no. 10.

²¹ See 7Annex D, specific instances no. 5, 8, 11 and 18.

²² See 7Annex D, specific instances no. 1, 2, 3, 4, 9, 14, 15, 16, 17, and 20.

²³ See annex D, specific instance no. 22.

²⁴ See annex D, specific instances no. 16, 20 and 21.

²⁵ See annex D, specific instance no. 18.

²⁶ See annex D, specific instance no. 19.

²⁷ See annex D, specific instance no. 15.

²⁸ See annex D, specific instance no. 1.

²⁹ See annex D, specific instance no. 10.

³⁰ The government recently proposed amendments to the act, including with a view to clarify social considerations such as for human rights impacts in public procurement (MTIF, 2025^[75]).

³¹ See <https://anskaffelser.no/nn/berekraftige-offentlege-anskaffingar>.

³² Following a parliamentary decision, the Ethical Framework for the Pension Fund is currently undergoing review (Ministry of Finance, 2025^[76]).

