10th International Scientific Conference ERAZ 2024 – Conference Proceedings
https://doi.org/10.31410/ERAZ.2024.691

Legal Remedies for Victims of Corporate Human Rights Abuses: A Comparative Analysis

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Received: August 30, 2024
Revised: January 29, 2025
Accepted: February 20, 2025
Published: April 5, 2025

Keywords:
Remedy;
Human rights;
Abuse;
Business;
Corporate;
Law

Abstract: *This study examines the legal recourse for victims of corporate human rights violations in various jurisdictions, aiming to determine best practices and enhance human rights protection in the corporate sphere through comparative analysis. With corporations exerting considerable influence and power globally, often crossing borders without consequence, there has been a surge in human rights abuses. The research digs into the available avenues for victims to seek redress for such violations, analyzing the strengths and weaknesses of legal frameworks. By synthesizing case studies and legislative frameworks from diverse legal systems, the study seeks to identify practical approaches for improving access to justice, legal accountability, and the role of international law. Ultimately, it aims to contribute to conversations on corporate accountability and justice for victims of human rights abuses perpetrated by corporations.*

1. INTRODUCTION

Corporate activities and human rights intersection have recently garnered significant scholarly and legal attention. As corporations expand their global presence, they can positively impact human rights and contribute to global communities' well-being. By prioritizing ethical practices and engaging with local stakeholders, these companies can help foster sustainable development and enhance social responsibility. This paper seeks to provide a comprehensive comparative analysis of the legal remedies available to victims of corporate human rights abuses. By examining relevant international human rights, legal and quasi-legal frameworks, notable case studies, and the comparative efficacy of various legal frameworks, this analysis aims to highlight the strengths and limitations of current approaches and propose potential avenues for legal reform.

Access to effective remedies for victims of corporate human rights abuses remains uncommon rather than the norm (Tiruneh, 2023). Instances of abuses perpetrated abroad within corporations' supply chains and global operations often go unchecked, resulting in a dearth of avenues for victims to seek redress (Tiruneh, 2023). Consequently, enhancing victims' access to effective remedies is widely regarded as one of the foremost challenges in business and human rights.

The United Nations Guiding Principles "On Business and Human Rights" is the foremost torch of the ongoing process of protection for Human Rights abuses by commercial subjects and corporations, whereas it is provided, among others, in its third pillar of the general structure, the fundamental right: access to remedy (United Nations, 2011). The right to access the remedy is a necessity for the parties infringed on in a specific conflictual relationship, whether contractual or non-contractual. It turns out

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that after the stipulation of the first two pillars of the UNGP On Business and Human Rights, which are related to the duty of the State to protect Human Rights and to the corporate responsibility to respect human rights on an operational daily basis, States generally are obligated to furnish effective remedies for human rights violations under nearly all international and regional human rights frameworks (United Nations, 2011); however; it is important to envisage that States are prohibited from derogating their obligation to provide effective remedies even in national emergencies, particularly for rights that are not amenable to suspension during a state of emergency.

Examining corporate human rights abuses within various jurisdictions involves a multifaceted approach. First, relevant international human rights laws and treaties must be identified and reviewed to establish the overarching legal framework. Subsequently, investigating cases of corporate human rights abuses allows for a comprehensive understanding of the varied manifestations of such violations globally. A comparative analysis of legal frameworks and remedies available to victims across jurisdictions enables an in-depth assessment of the strengths and weaknesses of each approach, thereby providing insight into their effectiveness in safeguarding victims.

Furthermore, the impact of recent landmark legal cases related to corporate human rights abuses must be examined to gauge their significance on legal precedent and victim protection. Ultimately, evaluating potential paths for legal reform and improvement plays a pivotal role in fostering an environment that effectively safeguards victims of corporate human rights abuses worldwide.

2. LEGAL REMEDIES VIS-A-VIS LEGAL FRAMEWORKS IN DIFFERENT JURISDICTIONS

The regulation of corporate human rights abuses and the institution of reparatory mechanisms for the victims is governed by a mix of legal and quasi-legal norms at international, regional, and national levels. Among the global standards, the UN Guiding Principles on Business and Human Rights (UNGPs) are leading in articulating the "Protect, Respect, Remedy" framework, which outlines the state's responsibilities to protect human rights, the business responsibility to respect them, and the need for adequate remedies to victims (UN Human Rights Council, 2011). Likewise, the OECD Guidelines for Multinational Enterprises and the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy offer quasi-legal direction for responsible business practices and grievance mechanisms (OECD, 2011; ILO, 2017). The Rome Statute of the International Criminal Court (ICC), which is legally binding, holds individuals, including business leaders, liable for crimes against humanity and war crimes (United Nations, 1998).

On a regional level, instruments like the European Convention on Human Rights (ECHR), the African Charter on Human and Peoples' Rights, and the Inter-American Human Rights System provide means to address corporate human rights abuses indirectly, mainly by keeping states accountable for either enabling or failing to prevent such harm (Council of Europe, 1950; African Union, 1981; Organization of American States, 1969).

New legislative efforts focused on directly addressing corporations' accountability have emerged nationally. France's Duty of Vigilance Law of 2017 (French Government, 2017), Germany's Supply Chain Due Diligence Act of 2021 (German Federal Government, 2021), and the UK's Modern Slavery Act of 2015 (UK Government, 2015) make it obligatory for companies to prevent and respond to human rights violations in their operations and supply chains, along with the provision of civil liability and remedy mechanisms. In the United States, the Alien Tort Statute (U.S. Code, 1789) has been used to enable foreign nationals to sue corporations in U.S. courts for violations of international law.

Underpinning such legal frameworks are soft law frameworks and voluntary efforts, such as the Equator Principles (Equator Principles Association, 2003), Global Reporting Initiative (GRI, 2021) Standards, and the Voluntary Principles on Security and Human Rights (Voluntary Principles Initiative, 2000), that promote responsible corporate conduct and disclosure. New models, like the draft Binding Treaty on Business and Human Rights being negotiated at the United Nations and the European Union Directive on Corporate Sustainability Due Diligence (European Union, 2023) as amended with the Directive (EU) 2024/1760, aim to apply broad and legally enforceable obligations on business firms to avert human rights abuses and establish mechanisms of redress for those affected. These frameworks together form a dynamic legal and regulatory landscape addressing corporate human rights abuses, focusing on the interplay between sophisticated legal codes, non-binding regulations, and voluntary methods in advancing accountability and justice.

This paper focuses on access to remedies for victims of corporate human rights infringement; thus, it will remain the third pillar of the UNGP On Business and Human Rights. Even though it still has quasi-legal elements regarding mandatory implementation, it gives parties and corporations correlated and strong insight regarding such actions or omissions.

The third of the United Nations Guiding Principles (UNGPs) requires guarantees that victims of human rights violations by business enterprises enjoy access to effective remedies. This is supported by three main types of mechanisms: judicial mechanisms, state-based non-judicial mechanisms, and non-state-based grievance mechanisms (United Nations, 2011, p. 28; pp. 33-34).

State-based judicial processes, laid down in principle 26 of the UNGPs, are steps to improve the efficacy of national courts in dealing with business-related human rights violations. They involve investigating avenues through which legal, practical, and other barriers to access to remedy can be eliminated.

State-based non-judicial grievance systems are different administrative bodies that meet the effectiveness criteria in principle 31 of the UNGPs. They must be legitimate, accessible, predictable, equitable, transparent, and consistent with internationally recognized human rights norms. The Office of the High Commissioner for Human Rights (OHCHR) outlines four types of such state-based non-judicial mechanisms:

1. Complaint systems in different administrative departments tasked with public regulation and enforcement.
2. Human rights-related inspectorates, such as labor and environment ministries, offer grievance mechanisms.
3. Alternative types of ombudspersons.
4. Institutions of mediation and conciliation funded by the state.

Grievance mechanisms that are not state-based are company- or multi-stakeholder group-initiated and regional and international organization-initiated mechanisms (Office of the High Commissioner for Human Rights, 2018, pp. 10-13). The Office of the High Commissioner for Human Rights (2018) differentiates between three types of non-state-based grievance mechanisms:

1. Company-based mechanisms run and established by companies.
2. Grievance mechanisms under industry initiatives, multi-stakeholder initiatives, or those related to international certification bodies.
3. Mechanisms under international finance institutions offer individuals or groups affected by projects financed by these institutions a chance to raise complaints.

These are actually what UNGP, as a pioneer of soft legislation, stipulates and puts into the parties' disposition to use when necessary and when an apparent infringement is on the horizon.

Directive (EU) 2024/1760 (European Union, 2024) is also a newly enforced legal instrument that has already been part of the European Union's and the member states' domestic legislation. It is the first legal and binding instrument in the EU that corresponds to the dynamics of the activity of corporations and companies that engage in abusive conduct towards victims of human rights infringement.

The EU directive also sets out rules requiring companies to identify and address adverse impacts linked to an organization's operations, subsidiaries, and supply chains and to take measures to prevent, mitigate, and remediate potential and actual adverse impacts.

Article 8 requires that companies demonstrate that they identify and assess any adverse impacts they may cause or contribute to through their own activities or business relationships with subsidiaries, business, or supply chain partners. This includes mapping operations to identify where adverse impacts are most likely and conducting more detailed assessments. Member States shall provide companies access to adequate resources for this process, including independent reports and complaints mechanisms (European Union, 2024).

Article 9 compels the companies to prioritize identified adverse impacts in terms of severity and likelihood. This method of prioritization ensures that the most lethal impacts are addressed first. Organizations can address the lesser impacts after focusing on the most severe impacts (European Union, 2024).

Article 10: Preventing or mitigating the potential for adverse impacts. It details actions companies must take — from developing prevention action plans and requiring contractual assurances of compliance to making appropriate investments. Specifically, for business partners, particularly for SMEs, businesses are suggested to extend support, whether in the form of capacity-building or financial assistance, enabling them to achieve compliance (European Union, 2024).

Article 11: It covers severe negative impacts and obliges companies to act to eliminate or reduce those impacts. If not resolved immediately, they must create corrective action plans. Necessary partnerships with other entities and possible reliance on third-party verification to enforce such legislation are also mentioned (European Union, 2024).

Article 12 states that where a company has caused or contributed to actual adverse impacts, it shall provide remediation through the following means: remediate the impact by taking proportionate action based on its role in the impact; where remediation is not provided, the company shall explain why; where a company caused actual adverse impacts, it should cease the activity that caused the impact; share information related to remediation in its disclosures. This could also apply when the business partner is the leading contributing cause(s) to the harm if you voluntarily comply (European Union, 2024).

In essence, these articles articulate a more proactive and systematic approach for companies to address negative impacts throughout their operations and supply chains, detailing a clear agenda for prioritization, prevention, mitigation, and remediation.

Certain jurisdictions have already addressed the case of remedies available for human rights corporate abuses; thus, three jurisdictions have been selected to be compared with their features:

France, the United Kingdom, and Sweden, as examples of civil and common law legal families and economically and traditionally elaborated in the field of law.

Sweden's legislation is based on continental civil law and Anglo-Saxon common law traditions. Statutory acts are the dominant sources of law, followed in order of priority by custom of courts, preparatory works, and learned doctrines, with preparatory works playing a particular role in interpreting statutes (Larsen, 2014). Swedish courts have previously accorded precedence to the accommodation of decisions with legislative purposes, even at the cost of constitutional principles. Nevertheless, EU membership and ECHR integration have added preventive, reparative, and legislative functions to courts (Larsen, 2014). Civil liability, per the Tort Liability Act, adheres to the culpa rule, with compensation to be paid for intentional or careless damage (Larsen, 2014, p. 423).

Corporate criminal liability is established through corporate fines based on economic crimes (Penal Code, 1962, Ch. 36, §§ 7-10). Individual criminal liability generally accompanies fines unless negligence is sufficient, as in environmental crimes (Svea Court of Appeal, 1992, p. 73). Common corporate crimes include contraventions of environmental codes, accounting fraud, and workplace safety legislation (Environmental Code, 1998, Ch. 29). Sweden also adopted a National Action Plan for Business and Human Rights in 2015.

In the UK, precedent is the basis of the common law tradition. Case law, for instance, Chandler v Cape Plc (2012), set out conditions under which parent companies are under a duty of care to employees of subsidiaries, including direct policy involvement and superior knowledge (Court of Appeal, 2012). Criminal liability involves the establishment of both actus reus and mens rea by senior company officers. The 2015 Modern Slavery Act introduced a transparency measure mandating that organizations with more than £36 million turnover report their efforts to address slavery in their supply chains. Moreover, the United Kingdom was the first to have a National Action Plan for Business and Human Rights in 2013, updated in 2016.

In France, criminal law covers various offenses and injuries against both natural and legal persons. Under Article 121-2 of the French Criminal Code, legal persons are subject to criminal liability for acts performed by their representatives or organs on their behalf. Moreover, Article 113-6 provides French jurisdiction over offenses perpetrated extra-territorially by French citizens, both natural and legal persons (French Criminal Code, n.d.). As an exception to criminal liability, insofar as civil liability is involved, the French Civil Code states through Articles 1240 and 1241 that three requirements are necessary for establishing liability: a fault (either by act or omission), damage, and causality between them. More specifically, Article 1240 states that any act causing injury obliges the perpetrator to compensate for the damage suffered, while Article 1241 extends liability to cases involving negligence or imprudence (French Civil Code, n.d.).

A significant leap in corporate responsibility was made with the passing of the Duty of Vigilance Law on February 21, 2017. The law mandates big businesses to have a human rights due diligence mechanism in place, which includes the creation, publication, and strict implementation of a vigilance plan. The plan must have measures to prevent serious human rights abuses and environmental damages caused by the corporation, its subsidiaries, subcontractors, and suppliers. The law, passed after extensive legislative debates and negotiations between different stakeholders, creates a legal duty on parent companies to monitor the activities of their subsidiaries and business partners (French Government, 2017), 2017). Notably, it allows for filing civil liability against companies not meeting such responsibilities, a practice that occurred in 2019 (French Government, 2017).

3. CASE LAW

Shein and Sweatshop Labor (2021-Present). Fast fashion brands have long been accused of exploiting workers within their supply chains, primarily because many of their products are produced in China, where labor laws are very lax. Investigations in 2021 also found that Shein's suppliers were paying their workers below the minimum wage and forcing them to work long hours under poor conditions to meet tight production deadlines. Press reports described abusive working conditions, with claims of chronically overworked hours, perilous environments, and poor health and safety conditions in plants. The working conditions were so harsh in some cases, where workers were forced to meet unrealistic production quotas that the company was accused of exploitation and severe violations of labor rights.

Shein and Child Labor (2022). Shein has similarly been accused of using child labor within its supply chain. In 2022, the U.S. government's Department of Labor cited the company's connections to suppliers that utilized child labor, especially in nations such as India and Bangladesh. These suppliers were also accused of employing underage labor in violation of international labor conventions. Although Shein has denied the use of child labor, the company has faced growing calls for transparency and oversight of its manufacturing practices.

Environmental Impact (Shein, 2023): Shein also faces heavy criticism, more indirectly related to labor abuse, for its environmental impact tied back to unsustainable production practices. Its business model promotes a quick turnover of cheap apparel and drives waste, pollution, and resource depletion. Poor work conditions in factories that have not followed environmental protection laws worsen environmental damage. These practices indicate the more significant issues of exploitative labor conditions and environmental degradation intermixed in the fast-fashion supply chain.

The Shell Case in Nigeria: Shell activities in Nigeria, in the Ogoniland region, have been associated with extensive environmental degradation and human rights abuse. The Nigerian legal system has faced enormous challenges in holding Shell accountable due to the conjunction between business might and government corruption (Ibeanu, 2011). The case alludes to the difficulty of applying business responsibility when corruption is entrenched, and regulatory frameworks are weak.

The Rana Plaza building in Bangladesh collapsed in 2013, which housed garment factories, resulting in over a thousand fatalities and numerous injuries. The tragic incident led to global attention to the unsafe working conditions prevalent in the garment industry and the lack of adequate regulatory checks. During the court trials in Bangladesh, significant loopholes in the legal code and enforcement policy designed to protect workers' rights became apparent (Hossain, 2015). This case illustrates the need for thorough labor law and its conscientious enforcement to safeguard human rights.

The Volkswagen Emissions Scandal (Global): The Volkswagen scandal, which came to light in 2015, involved the company's deliberate falsification of emissions data. This case highlighted environmental concerns and emphasized concerns regarding corporate deception and regulatory failures. Legal actions taken against Volkswagen had profound financial implications and structural legal changes. However, the case also proved the challenge of regulating multinational firms and their compliance with environmental regulations (Ewing, 2016). It emphasizes stronger regulatory measures and company accountability.

In Shell Petroleum Development Company v. Oguru (2022), the Nigerian courts held that Shell was partly liable for the environmental destruction caused by its operations, hence demonstrating the

potential for seeking legal remedy despite pervasive systemic barriers. The case highlighted the importance of judicial independence and accountability in addressing corporate abuse (Nigerian Supreme Court, 2022).

In Volkswagen's "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation (2017), this US case concluded with profound financial implications for Volkswagen. It illustrated the efficacy of legal instruments in holding corporations accountable for malpractice. It also illustrated the challenges of tracking transnational corporations and enforcing environmental regulations (U.S. District Court, 2017).

Lliuya v. RWE AG (2019). In this German court case, a Peruvian farmer sued RWE AG for its role in climate change. This case demonstrated an increased awareness of corporate accountability for environmental impact, and the court's openness to hearing the case indicates an increased openness to company accountability for environmental impact (German Federal Court, 2019).

4. FUTURE RESEARCH DIRECTIONS - EXPLORING PATHS FOR LEGAL REFORM AND ENHANCEMENT

Regarding future endeavors in accessing justice and remedies for breaches and abuses of human rights by corporations, several key reforms are needed to better protect victims of corporate human rights abuses.

International standards need to be strengthened through binding international treaties that hold companies accountable for human rights abuses. Strong partnerships among international actors and national governments can form the basis for a better, more integrated international approach to tackling corporate misconduct in various settings.

Nations need to develop and rigorously enforce strong laws that require corporations to carry out human rights due diligence and make provisions for victim protection. By focusing on robust enforcement mechanisms and maintaining vigilant oversight, legal protections for communities impacted by corporate activity can also be strengthened.

Increasing corporate transparency means more obligations for companies—like detailed human rights impact assessments and comprehensive public reporting—which can drive greater accountability. These changes will create clearer pathways for victims to seek justice and hold corporations responsible for their claims, which will help to empower anyone who has experienced the wrath of error from corporations.

Reforms to facilitate access to justice concern removing the obstacles that stand between victims and justice, such as high litigation costs and other procedural complexities. We need to provide victims with resources like free access to legal aid and proactive advocacy services that gently prompt victims to pursue their claims.

This acts as a means to one day push companies into taking a stance regarding human rights because if they are unable to prevent violations, social movements and consumer pressure will hold businesses accountable. Corporate social responsibility and active stakeholder engagement initiatives are instrumental in developing a culture that actually respects and protects human rights.

5. CONCLUSION

Ensuring corporate accountability for human rights abuses requires both judicial and non-judicial mechanisms. Politically, legally binding HRDD obligations can strengthen corporate due diligence and improve supply chain accountability, thereby increasing transparency. Access to justice needs specialized human rights courts, increased legal aid, as well as the expansion of class actions. Secondly, non-judicial mechanisms are available where corporate grievance mechanisms function as alternative dispute resolution mechanisms. Human rights clauses not only show a commitment by states to corporate responsibility, but they also embed this concept into their trade agreements and contracts.

Legal frameworks need to adapt to provide proper remedies to victims. Enforceable obligations would be established if laws mandating HRDD, for instance, the EU Corporate Sustainability Due Diligence Directive, were enshrined into law. Preventing corporate impunity by expanding extraterritorial jurisdiction through parent company liability and reforming the doctrines of forum non conveniens. Permanent improvements in the new legislation increase the scope of corporate criminal liability, including more robust sanctions like those the French established in their Loi de Vigilance. The UN Binding Treaty on Business and Human Rights has the potential to help support any state-level initiatives internationally if the jurisdiction can be expanded. Lastly, an International Business and Human Rights Tribunal would provide a focused venue for corporate abuse cases.

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