

The CARE Framework

The UN Guiding Principles on Business and Human Rights (UNGPs) outline an internationally-agreed approach for governments and companies to prevent, mitigate and remedy human rights issues. Coordinated efforts are needed from a range of actors to address underlying root causes, increase enforcement of applicable laws, improve procurement practices and solve systemic challenges. Mars has designed a framework to help bring the UNGPs to life for teams across the business, as they seek to apply them.

We developed the CARE Framework as a straightforward tool to create practical strategies based on the UNGPs. Together with our global human rights partner Verité we have begun using the framework to design our approach for priority raw materials – increasingly applying it across action in our workplaces, with our first-tier suppliers and in the extended supply chain. The CARE Framework guides teams to secure support and resources, understand root causes and drivers of risk in specific supply chain context and build key collaborations with locally-relevant partners.

This thinking tool informs strategy and action through four concurrent, key phases – **Commit, Assess, Respond, Engage**. Through this process we seek to **Commit** to policies, standards and governance, **Assess** the human rights issues facing specific supply chains, **Respond** to prevent, mitigate and remediate (where appropriate) potential human rights issues, and **Engage** with stakeholders on our performance, successes and challenges.

We are finding this tool useful to structure strategy development for work in our extended agricultural supply chains. We believe it may prove helpful across other types of supply chains, as well. The **CARE Framework** is a flexible, work-in-progress tool - we welcome your feedback as we look for ways to strengthen and expand its application.



Using the CARE Framework

We use an in-depth Practitioner Guide internally to help orient teams and support activation of the CARE Framework. The following summarizes each step of the Framework and provides some initial considerations to bear in mind.



COMMIT

Commit to policies and practices and build governance and capabilities.

WHY

An effective approach demands appropriate policies and practices coupled with the skills and capabilities to implement them, and governance mechanisms for senior leaders to provide steer and oversight. It is important to build these foundations up front and to strengthen and maintain them over time.

WHAT

This step in the framework involves identifying or developing:

- Internal buy-in and resource to support successful activation
- Cross-functional team across all relevant functions with clear accountabilities and governance processes
- Relevant policies, standards and practices

HOW

- 1. Internal buy-in and appropriate resource:** Obtain the necessary approval, funding, and support for your work across functions. Frame human rights challenges as you understand them in terms of their impact on people and the business. Consider whose support you will need in order to move forward - how can you cultivate their buy-in? What will their main questions or concerns be and how will you address them?
- 2. Working Team & Governance:** Form a small, engaged cross-functional team that will work together to develop and coordinate the work on your raw material. Representatives may include Procurement, Corporate Affairs, Legal and Sustainability, for example. Determine the composition of a governance steering committee to review progress and challenges, and assist in securing the buy-in and resources needed to succeed.
- 3. Relevant human rights policies or standards:** In addition to your own Human Rights Policy or Supplier Code of Conduct, consider whether there are additional internal or external policies or standards relevant to this supply chain. Do existing relevant standards have robust human rights components? Do you know if those human rights components are resulting in credible, proven impact?



A

ASSESS

Assess impacts across our value chain, actively listening to impacted people.

WHY

Assessing human rights impacts across value chains provides the information needed to respond appropriately – revealing what human rights impacts are or may be occurring, the nature and root causes of those impacts, and critical insights to inform a response. There are many methods and levels of due diligence assessment, and the best approach will depend on the circumstances. As outlined in the UNGPs, companies are expected to consult not only with experts, but also with groups whose rights may be affected, such as farmers, fishers, seasonal laborers, women and children in farming communities or factory workers. Companies are also expected to review impacts periodically, as circumstances change.

WHAT

This step in the framework involves identifying or developing:

- Detailed understanding of the commercial context of the raw material supply chain
- Industry-level or country-level human rights risk information from experts and other sources
- Whether it is necessary to conduct further assessment of impacts

HOW

- 1. Detailed understanding of the commercial context of your supply chain.** Review the commercial details of your supply chain, including level of visibility to each step. Consider what your T1 suppliers understand about potential human rights issues in their extended supply chain and any processes in place to address them.

- 2. Industry-level or country-level human rights risk information.** Review existing sources of information on human rights risk at the industry and/or country level in your supply chain. Sources should include a wide range of human rights experts, media, reports from other companies, reports from governments or civil society groups and the views of local groups or impacted people. Factors to consider could include:
 - ✓ Which human rights issues are most relevant to your raw material supply chain? Are there any characteristics of the workforce that may drive increased vulnerability?
 - ✓ At the country level, is there strong rule of law and stability? You may find it useful to [refer to this tool](#) developed by the World Bank. What is the country's national development plan and which components are most relevant to human rights in your supply chain?
 - ✓ Among your sourcing countries, which do you consider high-risk and which are medium or low-risk, from a human rights perspective?

- 3. Whether it is necessary to conduct further assessment of impacts.** Depending on range of factors, including the nature of the human rights risks in your supply chain and your current levels of knowledge and insight about the risks, you may decide it is necessary to conduct further assessment of impacts, together with relevant suppliers. Some considerations could include:
 - ✓ What level of depth do you need to inform your next steps, and what is the best format to obtain information (rapid research, in-depth assessment, etc.)?
 - ✓ Who is the best organization to support in either types of assessment and what is the cost?
 - ✓ What role will your T1 suppliers play? Do you have internal buy-in to take action on the results?



R

RESPOND

Respond by preventing, addressing and remediating impacts, in collaboration with industry, government and civil society.

WHY

There is no single path to addressing human rights impacts. The approach you decide to take will be influenced by a range of factors and guided by principles outlined in the UNGPs. Your actions, levels of effort, investment and direct involvement will vary depending on the circumstances, as well as the actions you expect from others. Regardless, it is essential to gather credible information about the nature and extent of the issue, before getting started - and to measure progress and results along the way.

WHAT

This step in the framework involves:

- A mapping of key stakeholders
- An approach to government engagement
- An approach to **Monitor, Mitigate, Address and Prevent** human rights impacts

HOW

- 1. A mapping of key stakeholders and understanding of the optimal role you can play.** Consider the relevant actors and their influence on the specific human rights issues in scope. What is their leverage, potential resources and capability to drive change?
- 2. An approach to influencing and engaging government.** By origin country, potentially consider:
 - ✓ Are there any key gaps in national laws or regulations that should be addressed?
 - ✓ Are there ways to leverage existing coalitions to convene government engagement on a specific topic with multiple company voices?
- 3. An approach to Monitoring, Addressing and Preventing human rights risks.** Together with credible and expert partners, you may design approaches that include elements of the following activities, including actions taken by your company, actions taken by suppliers, and actions taken in collaboration with other companies, civil society groups and government.
 - ✓ **In-depth dialogue with suppliers:** Engaging T1 suppliers about their understanding of risks in the extended supply chain and their approach. Next steps may include identifying gaps, consolidating a supply chain, securing commitment to continuous improvement, assessing management systems and improvement plans, or other actions.
 - ✓ **Action with Others:** Engaging with business, civil society and government around a core set of actions to drive change. This may include specific government engagement on behalf of industry, new or expanded work with other stakeholders to shape and scale impact.
 - ✓ **Supplier Capacity Building:** Support suppliers to develop and deploy robust management systems to monitor, address and prevent risk in their extended supply chain. Training and capability building will be needed in most cases.
 - ✓ **Monitor:** A system to regularly monitor relevant human rights issue(s) at relevant points in the supply chain. Monitoring may be internal or conducted by a credible third-party or other relevant organization at appropriate frequency and with appropriate reach.
 - ✓ **Mitigate or Address:** A system to address issues that are identified during monitoring or through other channels. Investment in appropriate remediation, to reduce immediate risk factors and/or reduce complex or structural drivers of risk. Specific remediation could include step changes in policies or practices related to working hours, pay-rates, or means of storing identity documents, for example.
 - ✓ **Prevent:** A system to deploy awareness raising or training as appropriate to target key drivers of risk. Additionally, investment in appropriate 'root-cause programming' designed to reduce structural drivers of risk.



ENGAGE

Engage transparently, sharing successes and challenges.

WHY

Sharing progress, challenges and next steps paves the way for earning trust and building collaborative efforts with others, which can drive even stronger results for impacted people.

WHAT

This step in the framework involves identifying or developing:

- Relevant industry coalitions or groups to influence the sector as well as core collaborators to bring scale to action and impact.
- A communications and engagement plan to learn from and collaborate with others and to share progress transparently.

HOW

1. Engaging in relevant industry coalitions or groups.

Consider the role you would like to have in industry bodies or certification groups, for example, roundtables on a specific raw material. Engaging in these groups can help strengthen existing approaches or introduce new actions – leveling the playing field and bringing along peers or other private sector or civil society actors to increase influence and leverage. Consider if it is most appropriate for you to join such a group, or to take on a leadership role.

2. A communications and engagement plan.

Taking into account a range of factors, consider what to communicate, to whom, how, and how often. And, which stakeholders to engage, how and when. A communication and engagement plan typically covers a 2-3 year period and includes a summary of the human rights risks for your material, an overview of your action plan and updates on progress and challenges over time, as well as your stakeholder engagement approach and any key milestones.