ICMM Response to BHRC Request – Human Rights Defenders

02 September 2026

1. **Please provide one or two concrete examples that demonstrate how ICMM's management team and its staff have supported, encouraged, or influenced member companies to implement ICMM's *Respecting Human Rights Defenders - ICMM Human Rights Due Diligence Guidance*?**

ICMM's support for implementation of the *Respecting Human Rights Defenders* guidance builds on a broader strengthening of its human rights framework. Following an update of its *Human Rights Due Diligence (HRDD) Guidance* to reflect evolving practice, regulatory developments and experience implementing the UN Guiding Principles on Business and Human Rights, in 2024, ICMM further strengthened its Mining Principles to explicitly recognise the important role of human rights defenders (HRDs). The revisions also required companies to consider HRDs in human rights due diligence, stakeholder engagement and security processes. Alongside these strengthened commitments, ICMM published dedicated guidance on *Respecting Human Rights Defenders*. With the support of ICMM members, the ICMM team has since actively supported implementation of these expectations through targeted capacity building, practical implementation support and ongoing engagement and peer learning. Below are examples of that support:

Delivering practical training and implementation support

Since the launch of the 2024 revision of the HRDD guidance, ICMM has delivered a comprehensive programme of practical training and implementation support for member companies through both in-person and virtual formats. It is important to note that HRDs are a core part of ICMM's HRDD framework, the guidance treats their protection as integral to due diligence, not an add-on, requiring companies to identify, prevent, respond to, and monitor risks to defenders across their operations and value chains. Below are the relevant activities:

- The HRDD training series commenced in 2024, with five in-person workshops delivered to date in Lima, Johannesburg, Perth, Vancouver, and Santiago. An additional in-person training is planned in Tarkwa, Ghana in 2026. In parallel, ICMM launched a virtual training series in 2026 to broaden accessibility and reach across member companies.

- Registration data from completed in-person and virtual training sessions shows participation from **394 representatives** across member companies. Including anticipated participation in the upcoming Ghana workshop, total participation is expected to be approximately **450 participants**.
- These figures significantly exceed our initial estimate of **300+ participants**, reflecting strong engagement from member companies and associations, and continued demand for practical support in implementing the HRDD guidance.
- In addition to the in-person and virtual training, ICMM developed a comprehensive train-the-trainer curriculum specifically to enable member companies to deliver and tailor the training within their own organisations. The curriculum includes a detailed trainer guide, exercise guide and handout materials and eight modules of training materials, facilitator guidance, exercises and other practical resources designed to build in-house capacity, strengthen understanding of human rights due diligence, and support consistent implementation of the guidance across teams, business units and operations. Several members have since used or adapted these materials to roll out their own internal training.
    - For example, Hindustan Zinc Limited (HZL) has developed tailored training using the curriculum, incorporated practical team-building exercises to make it easy to understand, and planned training sessions across all its sites.

Ongoing engagement and peer learning on human rights defenders

ICMM has continued to convene and support dialogue and peer learning on human rights defenders, beginning with a November 2022 member webinar with Oxfam and EarthRights International on *Company Approaches to Protect Human Rights Defenders*, followed by a further convening with Oxfam alongside the UN Forum on Business and Human Rights in 2024. ICMM has also used a range of channels to raise awareness of its updated guidance and associated training, including its stakeholder newsletter, which reaches approximately 12,000 stakeholders by email and more than 30,000 via LinkedIn, and through engagement at international fora around the time of and since the guidance's revision in 2024, in which ICMM leaders have spoken to global audiences about the strengthened expectations and supporting resources.

For example, ICMM's CEO, Ro Dhawan, referenced this work in his keynote address to the World Bank Land Conference in 2025.

External organisations and stakeholders have also been invited to contribute to ICMM's training workshops, bringing regional, rightsholder and issue-specific perspectives into the sessions and helping connect member peer learning with wider stakeholder experience and expectations.

2. **What steps does ICMM take to ensure that Human Rights Defenders, affected communities, and Indigenous Peoples are aware of the guidance and expectations set out in the Respecting Human Rights Defenders Guidance? Please provide an example of how these have been communicated in practice.**

ICMM's role is to establish expectations, provide practical guidance, and support capacity building across its membership. While ICMM does not directly implement site-level human rights due diligence, stakeholder engagement, or assurance activities, it works to ensure that member companies have the tools, guidance, and opportunities to strengthen their engagement with affected stakeholders, HRDs and rightsholders.

ICMM expects member companies to engage meaningfully with HRDs, affected communities, Indigenous Peoples, and other stakeholders and to take their perspectives into account when implementing the *Respecting Human Rights Defenders Guidance*. This expectation is grounded in the UN Guiding Principles on Business and Human Rights (UNGPs), including Principles 20 and 21, which emphasise the importance of tracking the effectiveness of a company's response to human rights risks and impacts, and communicating with affected stakeholders how those impacts are being addressed. In practice, this means identifying who the relevant defenders are and assessing risks to them (screen), building internal awareness and providing accessible, safeguarded grievance mechanisms (prevent), maintaining clear protocols to respond to allegations or incidents of harm and to remedy them (respond), and monitoring and communicating how those impacts are addressed (track and communicate).

Meaningful engagement with rightsholders and stakeholders is therefore both an important source of feedback on the effectiveness of company actions and a key mechanism for accountability and continuous improvement.

The *Respecting Human Rights Defenders Guidance* is publicly available on ICMM's website for anyone, anywhere to access. While it is intended to be used by member companies, including in their engagement with affected stakeholders, other mining companies outside the membership, as well as HRDs, host communities, Indigenous Peoples and representative and civil society organisations can also access it to use to engage with mining companies (or others). ICMM supports implementation of the guidance with its members through training, capacity-building, and practical guidance, as outlined above, with the expectation that companies will communicate relevant commitments and expectations through their own policies, stakeholder engagement and human rights due diligence processes.

While ICMM does not engage directly with rights holders on behalf of member companies, we seek to integrate external perspectives into the development and implementation of our guidance. In developing and advancing guidance related to human rights, including the *Respecting Human Rights Defenders Guidance*, ICMM engaged with subject matter experts, civil society organisations, and individuals with

relevant experience and expertise to help inform our approach. We also welcome ongoing feedback from Indigenous Peoples, affected communities, HRDs, and other stakeholders on how ICMM's guidance can be communicated more effectively and how implementation across the sector can continue to evolve and strengthen over time.

3. **What steps does ICMM take to ensure that its member companies understand the commitments outlined in the Respecting Human Rights Defenders Guidance?**

ICMM takes a multi-pronged approach to support member companies' understanding of the commitments set out in the *Respecting Human Rights Defenders Guidance* and related human rights requirements under the Mining Principles and the forthcoming Consolidated Mining Standard Initiative (CMSI) (see more below). As an industry association, ICMM's role is to establish clear expectations, develop practical guidance, facilitate peer learning, and build member capacity.

In addition to the training workshops and materials outlined above, to support peer learning and ongoing implementation, ICMM:

- Convenes member companies to share experience, emerging practice and implementation challenges, including through working group discussions, workshops and dedicated exchanges on HRDs.
- Provides an ongoing forum for broader member engagement through the Human Rights and Indigenous Peoples Peer Network, extending participation beyond Social Performance Working Group representatives and enabling a wider range of member company personnel to engage on specific human rights issues, including the protection of and engagement with human rights defenders (HRDs), as well as Indigenous Peoples issues.
- Since April 2021, ICMM has also convened members for a quarterly human rights legal update, provided by external expert, Jon Drimmer, and which has addressed, on several occasions, issues relevant to HRDs.

ICMM has used these forums to strengthen understanding of expectations relating to human rights defenders, share practical experience across the membership, and identify areas where further guidance, learning or capacity-building may be valuable.

4. **What mechanisms does ICMM have in place for Human Rights Defenders or affected community members to safely raise concerns, without fear of retaliation, regarding the conduct of your members? How are such concerns received, assessed, and addressed, including any processes for engaging with the relevant member(s)?**

ICMM does not operate an operational-level grievance mechanism, nor is our mandate to investigate, adjudicate, or remediate allegations of human rights impacts involving member companies. Consistent with the UNGPs, responsibility for establishing and operating effective grievance mechanisms rests with individual member companies, and this is also an ICMM membership requirement within our Mining Principles.

ICMM engages with HRDs, rightsholders and affected stakeholders and their representatives through a range of channels, including international or regional events where ICMM is present or at other fora where ICMM participates or hosts convenings, such as the UN Annual Forum on Business and Human Rights. Engaging through these channels allows ICMM to communicate to its membership any opportunities or concerns that are raised in those events.

ICMM does not tolerate retaliation against HRDs or other stakeholders who raise concerns regarding member company activities. Through our member requirements[1], guidance, and capacity-building efforts, we encourage member companies to adopt and implement robust non-retaliation commitments and to create environments in which concerns can be raised safely and without fear of intimidation, reprisal, or other adverse consequences.

About ICMM: *ICMM is a global leadership organisation for sustainable development, judging success by our contribution to creating a safe, just, and sustainable world through responsibly produced metals and minerals. We bring together approximately a third of the global metals and mining industry, along with key partners to drive leadership, action, and innovation for a safe, just, and sustainable world.*

[1] This expectation is underpinned by ICMM Mining Principle 3 (Human Rights), particularly Performance Expectation 3.1, which requires human rights due diligence to assess impacts on rightsholders, including Human Rights Defenders, as well as Performance Expectation 9.3 on engagement with Human Rights Defenders and access to effective grievance mechanisms.