1. Please provide one or two examples that demonstrate how your company has identified, assessed, and mitigated risks to Human Rights Defenders through its human rights and environmental due diligence processes since the adoption of your commitment.

Microsoft response:

Microsoft has a longstanding commitment to respect human rights in the context of its business operations and is committed to respecting the rights of human rights defenders. We conduct ongoing human rights due diligence aligned with the expectations set forth in the UNGPs. As part of these efforts, we consider risk to people who may be vulnerable as a result of their work or context.

In our human rights impact assessments, we pay particular attention to the impact of our operations or services on vulnerable groups and individuals and take action to respect human rights, including limiting the type of services we provide or customers that we serve. For example, in evaluating a new cloud datacenter region, Microsoft commissioned an independent assessment, informed by research and engagement with global and regional human rights experts, to identify salient risks to people and potential measures to mitigate those risks. The assessment has informed Microsoft's ongoing efforts to address the identified risks.

We also work to design technology and policy that takes account of potential risks to individuals - for instance, we do not allow the production of sexual imagery in our Copilot AI tool because we believe the risks of abuse or targeting, particularly of women and girls are too high.

These measures sit alongside efforts specifically designed to strengthen the safety and resilience of human rights defenders, including cybersecurity resources, enhanced threat monitoring through AccountGuard, and support for journalists, fact-checkers, and human rights defenders responding to AI-generated and manipulated media.

2. What steps does your company take to ensure that affected or potentially affected stakeholders - including local communities, Indigenous Peoples, workers, and civil society organisations - are aware of its commitments regarding Human Rights Defenders? Please provide an example of how these commitments have been communicated in practice.

Microsoft response:

We believe transparency is important. Microsoft's Global Human Rights Statement expressly states that we respect and support the work of human rights defenders and do not tolerate threats, intimidation, retaliation, or physical, legal, or cyberattacks against them, including when they challenge or protest aspects of our own business. Microsoft puts its human rights commitments into practice through ongoing engagement with rightsholders and stakeholders, including potentially affected communities and individuals, workers, civil society organizations, and other legitimate representatives. We use mechanisms including interviews, workshops, roundtables, surveys, focus groups, worker engagement, and grievance channels, and work to make participation safe, voluntary, accessible, and meaningful while protecting confidentiality and reducing the risk of retaliation. In our supply chain, for example, stakeholder engagement is integrated throughout the due diligence lifecycle and informs risk assessment, prevention and mitigation strategies, corrective action plans, remediation, and decisions regarding supplier relationships.

3. What steps does your company take to ensure that business partners - including suppliers, contractors, and other relevant business relationships - understand and respect its commitments regarding Human Rights Defenders? Please provide an example of how a business partner has engaged with or implemented these commitments.

Microsoft response:

Microsoft communicates its human rights expectations to suppliers and business partners through our Supplier Code of Conduct, Supply Chain Human Rights Policy Statement, Partner Code of Conduct, contractual expectations, and training. Directly contracted suppliers are required to review and acknowledge the Supplier Code annually, complete required training, and cascade relevant human rights and environmental expectations to their sub-tier suppliers. In FY26, for example, the Devices team launched a Train-the-Trainer program with three strategic Tier 1 suppliers to build their capability to train sub-tier suppliers on priority human rights, health and safety, and sustainability risks. Participating Tier 1 suppliers incorporated the training into their supplier-development plans and delivered the content further into their supply networks, demonstrating how Microsoft's expectations can be translated into supplier-led implementation.

4. Please provide an example of how a Human Rights Defender or affected community member safely raised a concern related to your company's operations, projects, or business relationships, and describe the steps the company took to address the concern and prevent retaliation.

Microsoft response:

Microsoft provides channels for individuals to raise concerns about potential human rights impacts safely and without fear of retaliation. The Microsoft Integrity Portal is available to external parties, including workers, communities near Microsoft sites, and other stakeholders, and allows anonymous reporting with confidentiality and non-retaliation protections. In FY26, we launched the Trusted Technology Review (TTR), a dedicated pathway within the Microsoft Integrity Portal for employees to raise concerns about how our technology is developed and deployed, including concerns related to human rights, privacy, responsible AI, accessibility, digital safety, and freedom of expression. Submissions receive structured intake, triage, and review, and the Trusted Technology Group follows up and, where appropriate, routes concerns to relevant teams for action.