



OF RESPONSIBLE
BUSINESS CONDUCT



National Contact Points for Responsible Business Conduct: Growing Impact, Rising Expectations

2025 Annual Report on NCP Activity



OF RESPONSIBLE
BUSINESS CONDUCT



50 years of responsible business conduct and 25 years of the NCP grievance mechanism

The OECD Guidelines for Multinational Enterprises were first adopted on 21 June 1976 and will celebrate their 50th anniversary in 2026. The Guidelines have undergone updates periodically since their adoption, including the creation of the NCP system in 1984 and the NCP grievance mechanism in 2000. With increasing demand for responsible business conduct, NCPs have continued to evolve.

A brief history of NCPs

- 1976** • Guidelines are first adopted
- 1984** • NCPs are established with a role to promote the Guidelines
- 2000** • Update of the Guidelines establishes NCP grievance mechanism
- 2005** • NCPs case submissions hit 100
- 2009** • Voluntary cycle of NCP peer reviews begins
- 2011** • Update of the Guidelines integrates the chapter on human rights, which quickly becomes the most referenced chapter in case submissions
- 2019** • NCP case submissions hit 500
- 2023** • Update of the Guidelines, notably to add policy support role for NCPs
- 2025** • Case submissions exceed 100 in a single year
- Mandatory cycle of NCP peer reviews begins

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are recommendations from governments to business on how to act responsibly. Governments adhering to the Guidelines are required to set up National Contact Points for Responsible Business Conduct (NCPs), the unique implementation mechanism of the Guidelines, which currently exist in 52 countries.

NCPs:

1. Promote responsible business conduct (RBC) with business and other stakeholders
2. Act as non-judicial grievance mechanisms in cases of alleged non-observance of the Guidelines by companies
3. May provide support for government policy efforts to promote RBC.

Each year, NCPs report on their activities to the OECD. This report presents the key findings relating to NCP activities across five thematic areas.

A separate document containing the entirety of the data reported by NCPs can be accessed in the online [annex](#).

Executive summary

2025

THEMATIC AREA

KEY FINDINGS

The NCP grievance mechanism

P.4



A **record 32 NCPs received a record 120 case submissions**, suggesting increased visibility of the grievance mechanism. **Timelines improved by around six months compared to 2024**, though stayed well-above recommended levels. **Submissions by individuals surged**, making up 71% of submissions in 2025, while those cases saw the lowest acceptance rates across stakeholder groups. **NCPs brought more companies to the mediation table** than in previous years and, while agreement rates were lower, **recommendations and determinations increased**. By the end of 2025, 73% of NCPs reported that their case-handling procedures were aligned with the 2023 Guidelines.

Promotion

P.15



NCPs remained active on promotion, reaching more than 42,000 people, despite record case submissions. 88% of NCPs organised or co-organised promotion, a record high. NCPs embraced new technologies, while also relying on traditional media outlets. Despite this, many NCPs engaged in very few events and **promotion was not always strategic** or equitably distributed across stakeholder groups.

Support for government efforts to promote RBC

P.19



An increasing number of **Adherents are developing public policy and regulation referencing the Guidelines**, the OECD Due Diligence Guidance, or the Recommendation on the Role of Government in Promoting RBC and 18 NCPs reported involvement in such developments. NCPs remained involved in **cross-government mechanisms regarding RBC policy areas**. **Most NCPs (58%) followed or were consulted on policy or regulatory developments** to promote RBC, though **fewer NCPs promoted the Recommendation** on the Role of Government to relevant officials.

NCP governance structures

P.21



Overall **staffing increased slightly** across the Network, but **some NCPs continued operating with insufficient resources**, contributing to the **gap in functional equivalence** between NCPs. **All NCPs except eight included stakeholders in their structures** reinforcing the trend of this good practice.

Peer reviews and capacity-building

P.23



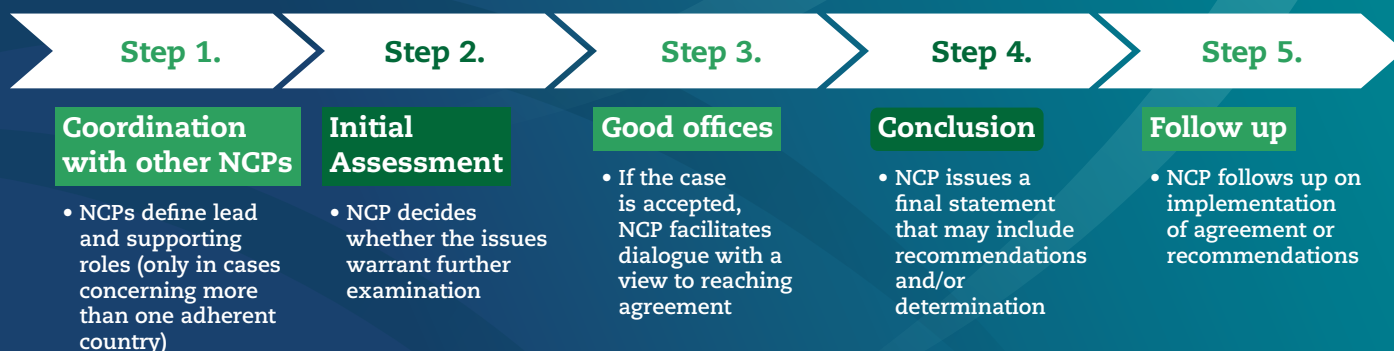
Peer reviews continued to play a key role in strengthening NCPs and functional equivalence, though recommendations relating to **restructuring and resources proved challenging to implement**. NCPs supported each other through peer-learning and the **launch of the NCP mentoring program**.

1 The NCP grievance mechanism



Interested individuals or organisations from any country can submit a case (referred to as a “specific instance”) to an NCP regarding the conduct of a company operating in or from the country of the NCP. NCPs handle cases according to the five steps below. [Click here to learn more about how NCPs handle specific instances.](#)

Cases are handled according to each NCP’s own case-handling procedures. In 2025, 49 NCPs had adopted such procedures, meaning that three NCPs were still missing this foundational step to receiving and handling cases. Seventeen NCPs modified their case-handling procedures in 2025. Thirteen (76%) of these updates involved stakeholder consultations. By the end of 2025, 73% of NCPs reported that their case-handling procedures were aligned with the 2023 Guidelines, compared to 42% by the end of 2024.



Cases received by NCPs in 2025

120

cases in 2025 is more than double the previous record for submissions in a single year

The number of new cases jumped in 2025 with 120 cases received, more than doubling the previous yearly record (58 cases in 2020).

Record number of NCPs receive record case submissions in 2025

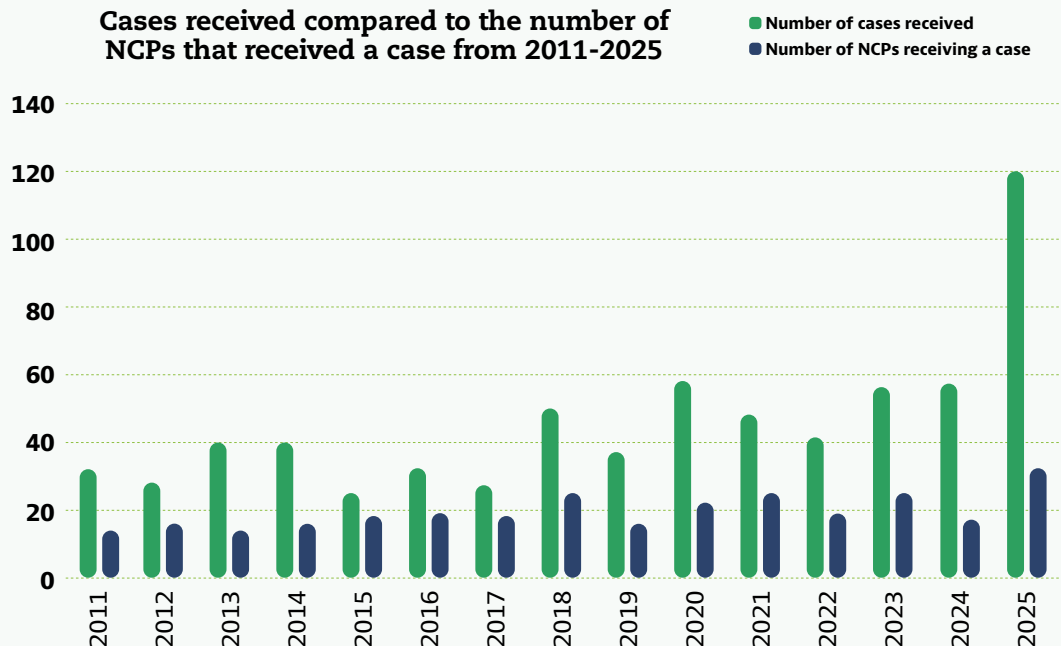
88%

increase in the number of NCPs that received at least one case during the year

The jump was largely powered by increased submissions by individuals (see below) and may be partially due to high promotional efforts in recent years, which increase the visibility of NCPs.

In addition, 2025 was a record year for the number of NCPs that received case submissions, with 32 NCPs across the Network receiving at least one case. With 62% of NCPs receiving a case, up from 33% in 2024, this represents the largest increase in NCPs receiving cases to date. Therefore, beyond record submissions, 2025 also showed record distribution of cases submitted across the NCP Network.

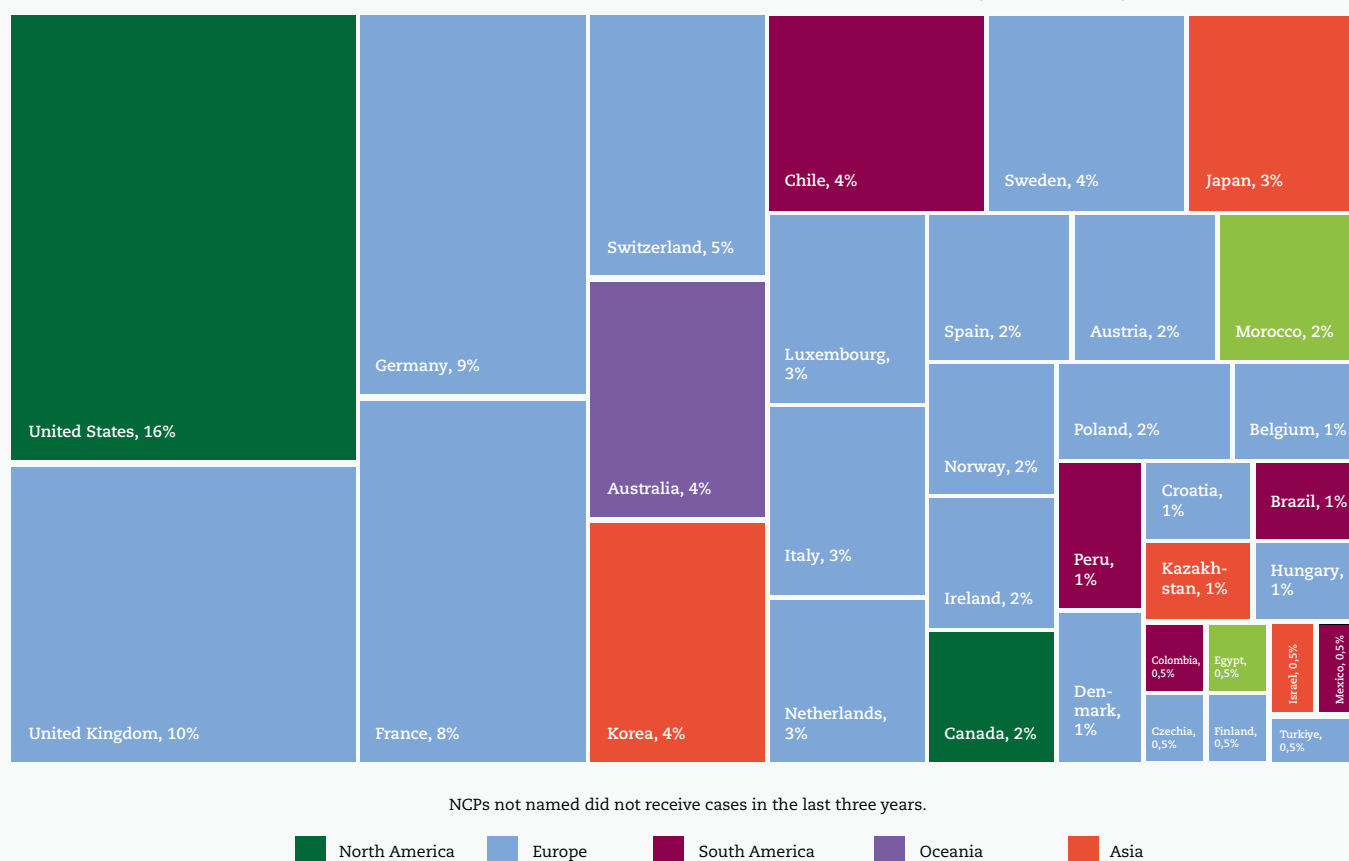
Cases received compared to the number of NCPs that received a case from 2011-2025



Despite this increase in spread of cases across the Network, a concentration of cases remains with some NCPs, notably as 52% of new submissions in 2025 were received by just five NCPs.

When looking at the total number of cases submitted to NCPs in the last three years, more than half of NCPs received between zero and two cases. A small number of NCPs, however, are outliers, with four NCPs receiving more than 20 submissions in the last three years.

Share of cases received by NCPs in the last three years (2023-2025)



Croatian NCP receives two cases submitted by individuals in 2025

On 12 August 2025, the Croatian NCP received its first case submitted by an individual concerning the operations of a company active in seaport management. The NCP received its second case from an individual on 9 November 2025 concerning a company active in railway management.

Source: NCP Reporting Questionnaires (2025)

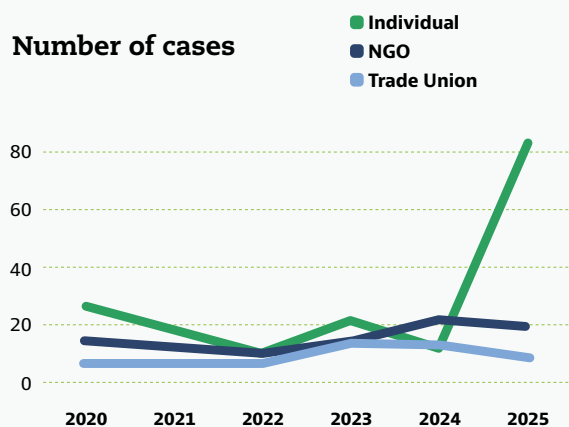
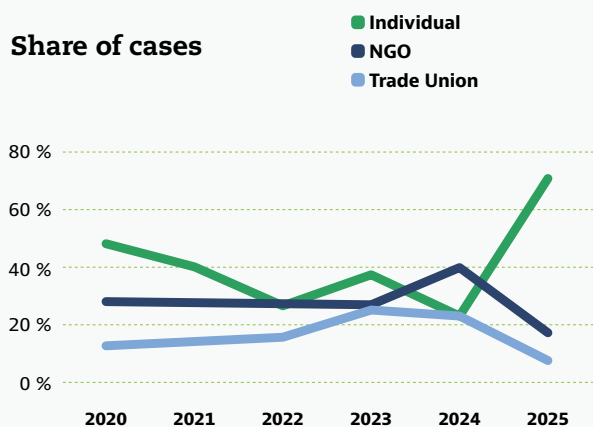
Egyptian NCP receives its first case in 2025

On 15 March 2025, the Egyptian NCP received its first specific instance, submitted by an individual relating to the operations of a company operating in the information and communication sector in Egypt. The issues raised related to the due diligence, human rights, and employment and industrial relations provisions of the Guidelines.

Individuals account for the surge in cases, making 71% of submissions in 2025

Individuals have made the most submissions to NCPs compared to other submitter groups in five of the last six years. While 2024 saw a larger share of cases from NGOs, individual submissions increased substantially in 2025, accounting for 71% of submissions received, up from 23% in 2024. Despite this increase in the share of cases during

the year coming from individuals, the number of cases received from other stakeholder groups did not vary greatly as compared to previous years. Issues, sectors, and geographies related to submissions by individuals were similar to those of the other stakeholder groups.

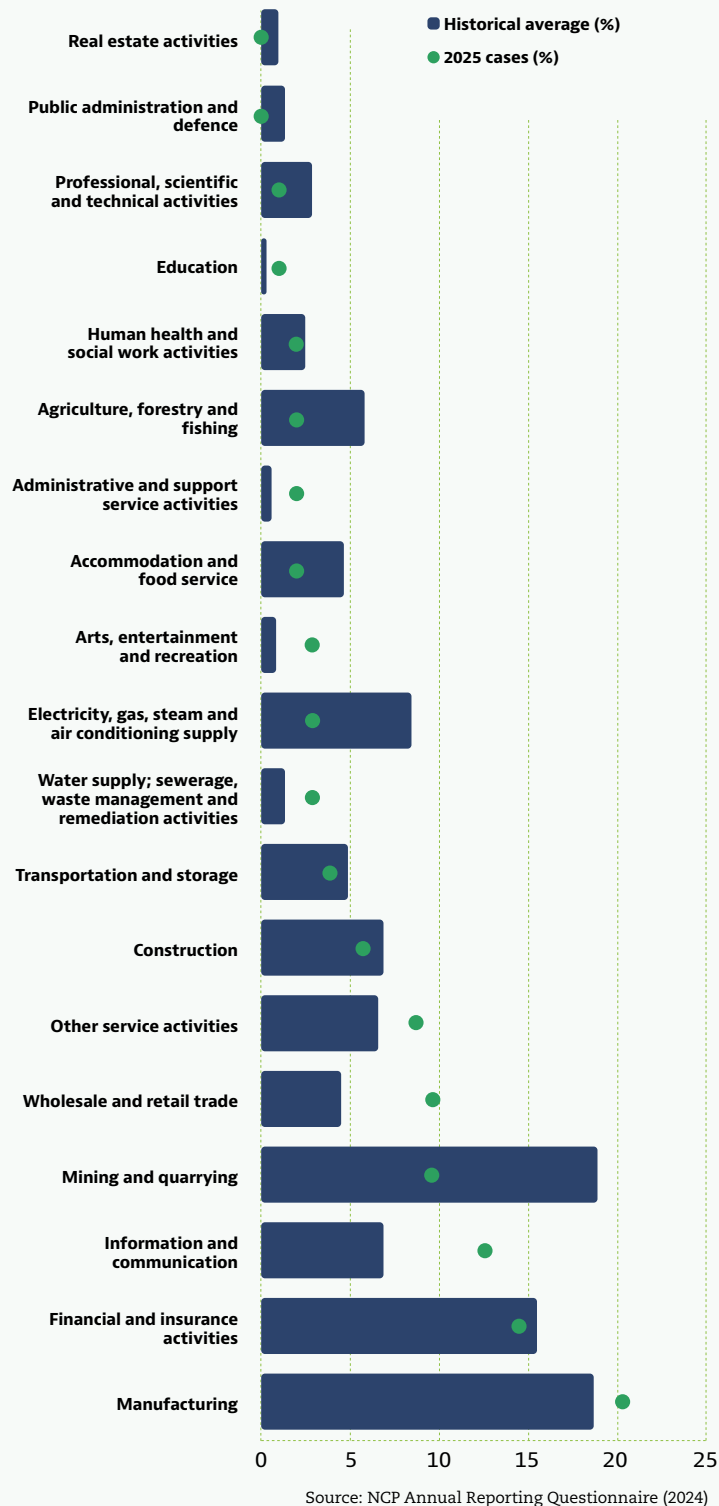


Cases in the Information and Communication sector increase.

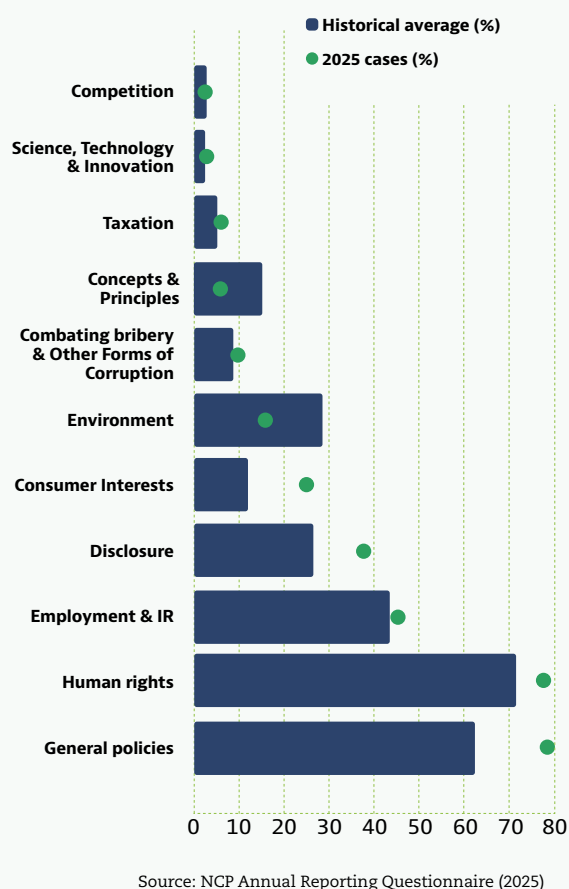
Issues relating to due diligence and disclosure see high submission rates in 2025

In 2025, the top three sectors concerned by cases received during the year were: manufacturing (21 cases), financial and insurance activities (15), and information and communication (13). Notably, cases relating to the information and communication sector were nearly double the historical average since 2011, while cases in the mining and quarrying sector were down compared to past years.

Sectors concerned in cases raised from 2011-2025



Issues raised in grievances from 2011-2025



Increased submissions in the information and communication sector, which include companies active in social media and artificial intelligence, pushed mining and quarrying from its usual spot as one of the three most referenced sectors in 2025. With the adoption in 2026 of the [OECD Due Diligence Guidance for Responsible AI](#), the role for NCPs in addressing cases related to development and use of AI may continue to evolve. The year also saw a large distribution of cases across sectors, with all but two (public administration and defence and real estate activities) of the 19 tracked sectors receiving submissions. Other sectors saw decreases compared to historical averages, such as the electricity, gas, steam and air conditioning sector, and the agriculture, forestry and fishing sector, which saw 5% and 4% decreases, respectively.

The three most raised key issues were: general policies/due diligence (85 cases), human rights (84) and employment and industrial relations (49). Close behind, 41 submissions referenced disclosure issues, accounting for a more than 10% increase as compared to historical averages, in line with the global increase in focus on reporting and disclosure of RBC policies and performance.

‘General Policies’, i.e. the provisions on due diligence, received the most submissions in 2025, overtaking human rights for the first time since the chapter’s introduction in the 2011 update of the Guidelines. The two chapters are frequently raised together, notably to raise issues concerning human rights due diligence. Submissions in 2025 covered all 11 chapters of the Guidelines. The chapter on consumer interests had double the historical share of cases. Cases referencing the consumer interests chapter are often submitted by individuals, with 74% of cases referencing the chapter being submitted by individuals in 2025. While the chapter on environment was updated with the 2023 Guidelines, and notwithstanding the significant attention to environmental matters, the share of submissions referencing the chapter decreased by more than 10% compared to historical averages, leaving it less in focus relative to other chapters. Despite the context of increasing concerns related to highly regulated areas important for business behaviour and supporting a level playing field, such as competition and taxation, the corresponding chapters are not often raised in specific instances.

Dutch NCP concludes a case relating to the information and communication sector

On 6 April 2021, International Alliance of App-Based Transport Workers (IAATW) submitted a specific instance to the Dutch NCP alleging that Uber Technologies, Inc. (Uber), a multinational company providing platform services in the transport and delivery industry, had not observed the Guidelines. Issues related to an alleged failure by the company to carry out adequate due diligence in relation to drivers’ health and safety, drivers’ earnings and hours, and Uber’s deactivation and blocking practices throughout its global operations. Additionally, submitters allege that Uber had not meaningfully monitored how the COVID-19 pandemic impacted drivers.

The good offices phase ended without mediation as the parties were not able to agree on the Terms of Reference for mediation.

On 21 May 2025, the Dutch NCP published a final statement in which it found that Uber had failed to observe the Guidelines in three ways. First, the NCP found that Uber had not fulfilled its due diligence obligations in relation to drivers’ earnings, noting a significant risk of a gap between the actual pay and living wage. Second, Uber’s deactivation practices did not align with the requirements for transparency, non-discrimination, and effective grievance mechanisms requirements, particularly given the risks associated with algorithmic decision-making and alleged racial bias. Third, Uber’s approach to stakeholder engagement did not meet the standard of meaningful two-way communication, as drivers and their representatives were not sufficiently involved in decisions affecting their rights and working conditions.

The NCP issued recommendations to Uber, such as in relation to achieving a living wage for drivers. The NCP will follow up on the specific instance one year after the date of publication of the final statement.

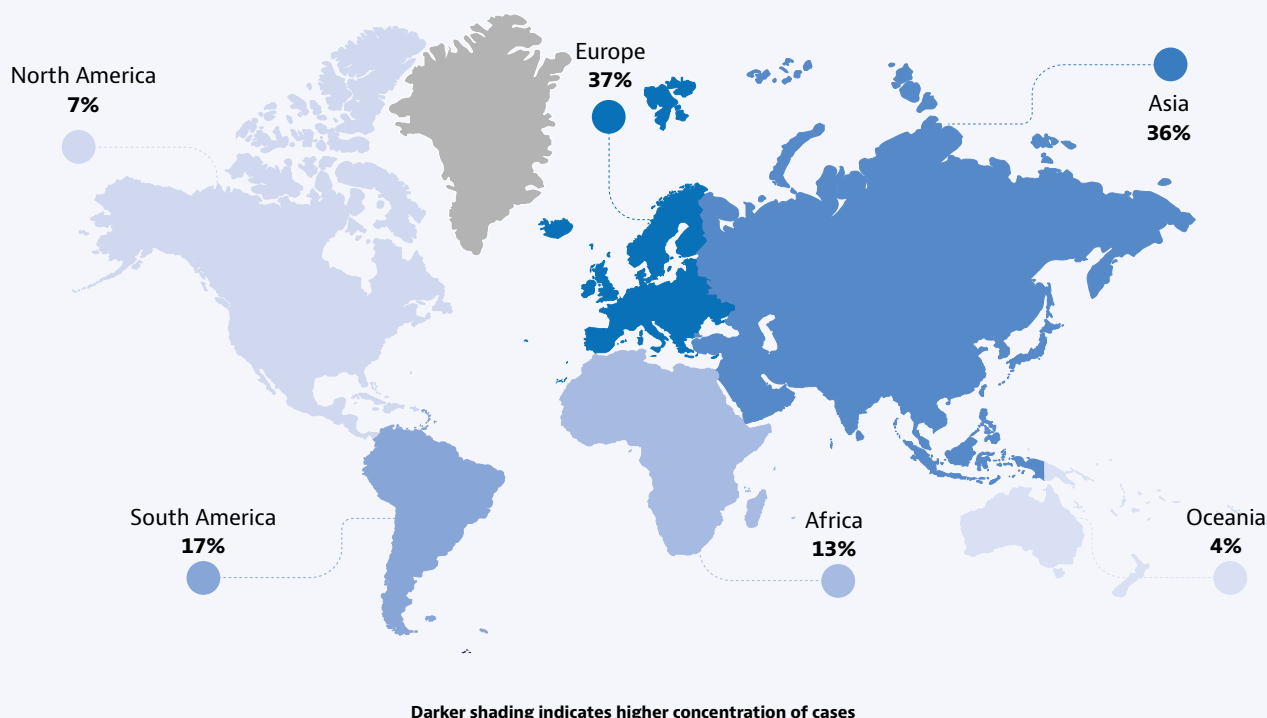
Source: International Alliance of App-Based Transport Workers (IAATW) & Uber Technologies, Inc. (Uber) <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database/nl0048.html>

Cases received in 2025 reach beyond adherent countries

NCPs can handle cases regarding a company operating in or from the territory of their country. This means that NCPs have a global reach, being able to address issues in countries that do not adhere to the Guidelines (see below). Since 2000, NCPs have handled cases with issues arising in over 110 different countries or territories. In 2025, NCPs reported receiving cases with issues arising in 56 different countries, compared to 38 in 2024.

Among these 56 countries, 24 (43%) were countries not adhering to the Guidelines. In 2025, Colombia (8 cases), the United Kingdom (8), and the United States (7) were the most referenced countries in which issues arose. The most referenced non-adhering countries in 2025 were Lebanon (5 cases), the Democratic Republic of the Congo (4), and Belarus (3).

Location of the issues in the 120 cases received by NCPs in 2025



Cases closed by NCPs in 2025

NCPs closed 56 cases in 2025, compared to 52 in 2024. Of those 56 cases, 26 (46%) were not accepted, and 30 (54%) were concluded after acceptance. This represents a slight decrease in acceptance rate, compared to 58% in 2024.

NCP cases demonstrate the ‘in or from’ principle

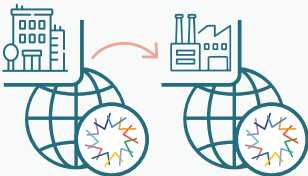
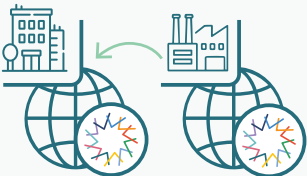
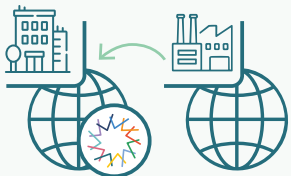
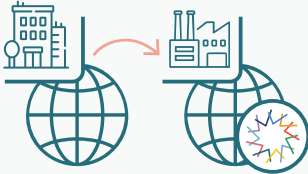
When considering the competency of different NCPs to handle cases, several scenarios can arise, particularly based on the adherence status of the country of the issues and the country of the company headquarters. In any case, the related NCPs are expected to coordinate.

There is a tendency for the NCP of the headquarter location to lead on cases, even when issues arise in another adherent country. Looking at the 15 cases closed in 2025 concerning a company headquartered in an adherent country, but where the issues are arising in another adherent country, in 67% of cases the NCP of the headquarters of the company was chosen to handle the case, an increase from 57% in 2024.

Part of the reason for what seems like a disconnect between the place of the issues and the NCP handling the case can be explained by the propensity of NCPs and case parties to seek to address issues through changes in due diligence policies adopted by the company at headquarters level rather than through intervention at operational level.

NCPs can receive cases involving companies headquartered in non-adherent countries and with operations in adherent countries. While such situations have not occurred frequently in previous years, 2025 saw an increase of cases concerning companies headquartered in non-adherents¹, with 9% of closed cases falling into this category, compared to 0% in 2024 and 5% in 2023.

Share of cases closed in 2025 based on scenarios considering adherence status and location of issues and company headquarters

		Is the country of the issues an adherent to the Guidelines?	
		Adherent	Non-Adherent
Is the country of the headquarters (HQ) an adherent to the Guidelines?	Adherent	 Scenario 1 Country of issues and HQ is the same Adherent (23%)  Scenario 2 Countries of issues and HQ are Adherents, country of issues leads (11%)  Scenario 3 Countries of issues and HQ are Adherents, country of HQ leads (18%)	 Scenario 4 Country of HQ is Adherent, country of issues is Non-Adherent (25%)
	Non-Adherent	 Scenario 5 Country of issues is Adherent, country of HQ is Non-Adherent (9%)	No NCP available

Note: Arrow points to lead NCP. In case of several countries of issues or HQ, if at least one country of issues is the same as the HQ location country, it is counted as scenario 1. If at least one country of issues is an Adherent, it is counted as an Adherent. The relationship was not definable in 14% of cases. (N=56).

1. Companies with headquarters in the People's Republic of China, the Democratic Republic of the Congo, Seychelles, Singapore, and the United Arab Emirates were raised in submissions closed in 2025. Headquarter location was undefined in six specific instances.

French NCP handles a specific instance involving a company headquartered in a non-Adherent

On 30 June 2023, two French MPs submitted a specific instance to the French NCP alleging that Shein, a Chinese-Singaporean fast fashion retailer, had not observed the Guidelines. Issues included respect for local law in the production and sale of Shein products in France, respect for human rights, working conditions, consumer interests, potential negative environmental impacts, and the responsibility of the company in addressing such violations through due diligence in its supply chain. Both parties engaged in mediation but were unable to reach agreement on the issues raised.

On 29 September 2025, the NCP published a final statement concluding the specific instance without agreement between parties, and the NCP proceeded to examine the issues raised. The NCP determined that the company had not observed multiple provisions of the Guidelines. Shein disputed the analysis made by the NCP. The NCP noted that since the specific instance had first been submitted, the company had made efforts to formalise a sustainability policy. The NCP issued recommendations to the company, notably to update its business policy and business model incorporating the OECD RBC instruments, to disclose financial information and to expand its reporting on responsible business conduct. The NCP will follow up 6-12 months following after the publication of the final statement.

Note: A [second case concerning Shein](#) was submitted to the Belgian NCP and the Belgian and French NCPs coordinated on case-handling.

Source: Two French MPs & Shein <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database/fr0037.html>

Cases closed in 2025 lead to agreements, recommendations, determinations, and follow up procedures to support affected persons

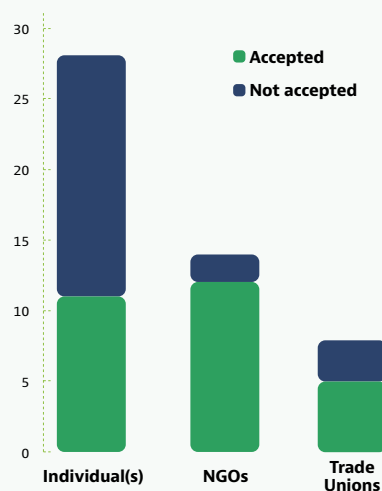
39%

of cases submitted by individuals were accepted, the lowest of all submitter categories

NCPs accepted fewer cases for third year in a row

Acceptance rates following Step 2 of the process (see above, p. 4) remain uneven across different types of submitters in 2025. Looking at cases closed, of the 8 cases submitted by trade unions 63% were accepted after the initial assessment. Of the 14 closed cases involving NGOs, 86% were accepted. Continuing a trend of previous years, individuals had the lowest acceptance rate at just 39% of the 28 cases closed, a decrease from 2024 when 47% of cases involving individuals were accepted. This shows that individuals may be experiencing difficulties building viable cases and may lack understanding of the NCP's remit in handling grievances. The lower overall acceptance rate in 2025 can be partially attributed to a high share of submissions by individuals, which are rejected at higher rates than the submissions by other stakeholder groups.

Acceptance status of cases closed in 2025 by stakeholder group



NCPs facilitated seven agreements in 2025¹

When a case passes initial assessment, NCPs will seek to facilitate a mutually agreed solution to the issues, most often using mediation (Step 3. Good offices, see above, p. 4). NCPs facilitated mediation in 40% of accepted cases in 2025, compared to 32% in 2024. This means that NCPs have been more successful in bringing companies to the table, which has been a vexing challenge in previous years. However, mediation was less successful than in previous

25%

of cases led to agreement after mediation

years. In 2025, only 25% of cases with mediation led to agreement, lower than in 2024 when 57% of cases with mediation led to agreement, and way down from 73% in 2023. While the ultimate goal of the process

is to reach agreement, when that is not the case, NCP cases can still yield concrete outcomes such as recommendations, determinations, and follow up procedures, which all increased in 2025 (see below).

Similar to previous years, looking at cases concluded without agreement, the main reason (39% of cases) why agreement could not be reached was the company declining to engage in mediation. Again showing the increased success of NCPs in bringing companies to the table, this is a decrease from 2024 when 59% of cases without agreement were due to company refusal to engage and further continues a downward trend from 64% in 2023. In 30% of cases, parties were unable to come to mutual agreement despite engagement from both sides. Other reasons were noted for lack of agreement between parties, such as submitter withdrawal from the procedure or breakdowns in negotiating the terms of reference for mediation.

40%

of accepted cases brought companies to the table for mediation

Norwegian NCP determines that company should take more active role in remediation

On 27 July 2021, the Center for Research on Multinational Corporations (SOMO) on behalf of 474 civil society organisations (CSOs) in Myanmar submitted a specific instance to the Norwegian NCP alleging that Telenor ASA, a Norwegian telecommunications company, had not observed the Guidelines. Issues related to an alleged lack of risk-based due diligence, stakeholder dialogue and disclosure in the company's disengagement from Myanmar related to its decision to sell 100 per cent of its subsidiary Telenor Myanmar to M1 Group, a Lebanese investment holding company. According to the submission, the owners of M1 Group have a history of business in authoritarian countries and face unresolved allegations of corruption and terrorist financing.

Following mediation, the parties arrived at a memorandum of understanding, which notably included an agreement for an independent information and communication technology (ICT) ecosystem study, and exploring how an independent Myanmar digital security relief mechanism could be established. A follow up mediation session to discuss the ICT ecosystem study was cancelled due to disagreements between the parties, particularly in relation to the digital security relief mechanism.

The NCP issued a final statement on 11 December 2025, in which it examined remaining issues and found that Telenor did not carry out sufficient ongoing human rights due diligence, and that it should take an active role in remediation. The NCP notably recommended that the company continue its engagement relating to a digital security relief mechanism to provide support (financial and other) to Myanmar citizens facing risks and impacts associated with their digital footprint. The NCP will follow up with the parties one year following publication.

Source: Center for Research on Multinational Corporations (SOMO) on behalf of 474 civil society organisations (CSOs) in Myanmar & Telenor ASA <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database/no0019.html>

1. Outcomes of all cases closed in 2025 can be found in the data [annex](#).

NCP cases promote RBC beyond agreements

In addition to agreements, NCPs facilitate other outcomes that may promote RBC during Step 4 of the case-handling process (see above, p. 4). This could include:

96%

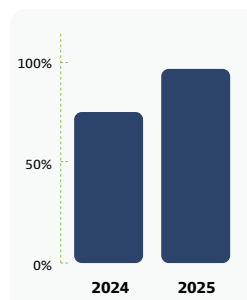
of final statements in cases concluded without agreement included recommendations



Recommendations

- NCPs can issue recommendations to one or both parties irrespective of whether or not an agreement was reached.
- In 2025, recommendations were issued in 83% of all final statements of concluded cases, and in 96% of final statements where the parties did not reach agreement, up from 69% and 75% in 2024, respectively.

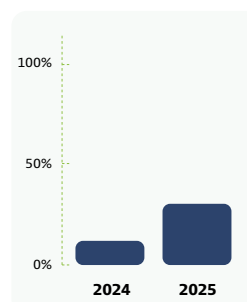
Rate of recommendations in cases concluded without agreement



Determinations

- Some NCPs have the practice of issuing a determination as to whether or not a company has acted in accordance with the Guidelines. This is most often the case when a company has refused to engage in the specific instance process, or when the parties were unable to reach an agreement. In the last three years, seven NCPs have issued determinations in closed cases.
- Determinations were issued in seven cases concluded in 2025 (30% of cases without agreement), up from 12% in 2024. All seven cases determined that the company had not observed the Guidelines.

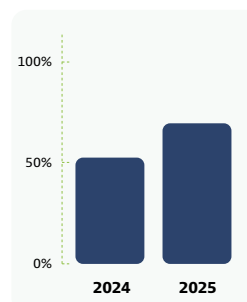
Rate of determinations in cases concluded without agreement



Follow up

- NCPs are expected to follow up on recommendations and agreements of specific instances where relevant. They are encouraged to publish follow up statements.
- Over two-thirds (67%) of final statements from concluded cases in 2025 included plans for follow up. This represents an increase compared to 2024 when 53% of final statements for concluded cases referenced plans for follow up.
- NCPs do not seem to conduct all the follow up they plan. In 2025, NCPs reported follow up on recommendations in six cases and published follow up statements for each of these. This is less than would be expected given that 16 cases concluded in 2024 planned for follow up. In two cases the NCPs concluded that the company had fully implemented the recommendations. In two other cases, the NCP found that the company had not implemented any of the recommendations. In another two cases, the NCP reflected the parties' views but did not draw conclusions.

Rate of follow up planned in concluded cases



Parties reach agreement during the follow up phase in a case led by the UK NCP

On 11 March 2019, three NGOs, Inclusive Development International (IDI), Equitable Cambodia (EC), and Cambodian League for the Promotion and Defense of Human Rights (LICADHO), submitted a specific instance to the UK NCP alleging that Bonsucro, a multi-stakeholder sustainable sugar certification membership organisation, failed to conduct adequate due diligence and apply leverage to its member Mittr Phol Group – Thailand (MPG-T) with regards to alleged human rights violations in Cambodia. The submitters also alleged that Bonsucro did not have adequate human rights policy commitments nor an effective grievance mechanism. The parties were unable to reach agreement during good offices so the UK NCP conducted a further examination of the issues.

On 11 January 2022, the UK NCP published a final statement, making a determination that Bonsucro had breached the Guidelines in relation to due diligence and leverage when readmitting MPG-T as a member, based on a lack of human rights due diligence and a failure to mitigate adverse impacts linked to business operations. The NCP found that Bonsucro had not breached the Guidelines regarding an effective grievance mechanism.

The UK NCP reached out to the parties as part of the follow up process in September 2024. In January 2025, the parties reengaged in dialogue outside of the NCP process and later provided the update to the NCP that an agreement had been reached concerning the underlying issues raised in the complaint.

Source: Inclusive Development International (IDI), Equitable Cambodia (EC) Cambodian League for the Promotion and Defense of Human Rights (LICADHO), and Bonsucro <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database/uk0053.html>

NCP case durations decrease for the first time since 2021, but lengthy cases remain common

In addition to seeing improved practices at the conclusion of specific instances, NCPs also improved timelines for handling cases compared to previous years. In 2025, the average duration of a case concluded was around 29 months (883 days). While this exceeds the indicative timeline of 12-14 months, it is a decrease compared to the average duration of 35 months (1067 days) in 2024, and the lowest case duration of the last four years.

Some particularly lengthy specific instances are responsible for dragging up the average duration. Notably in 2025, two specific instances exceeded 66 months. In one of these cases, the NCP noted delays due to the complexity of the case, which included coordination, extensive documentation requiring translation, fact-finding, combined with a high overall workload of the NCP.



KEY NUMBERS ON THE NCP GRIEVANCE MECHANISM

120 case submissions

32 NCPs received cases

6 months decrease in average case-handling timeline

54% of cases passed initial assessment

25% of cases with mediation led to agreement

39% of cases submitted by individuals are accepted, the lowest of any stakeholder group

2

Promotion



An important function of NCPs is to promote awareness of RBC as well as the visibility of the NCP itself. This requires sustained efforts to communicate to the business community, worker organisations, civil society organisations and other interested parties. NCPs use various strategies to conduct promotion, such as organising and participating in events, developing print or multimedia promotional materials, and establishing online presence through websites and social media.

Record number of NCPs contribute to promotional events across the Network in 2025

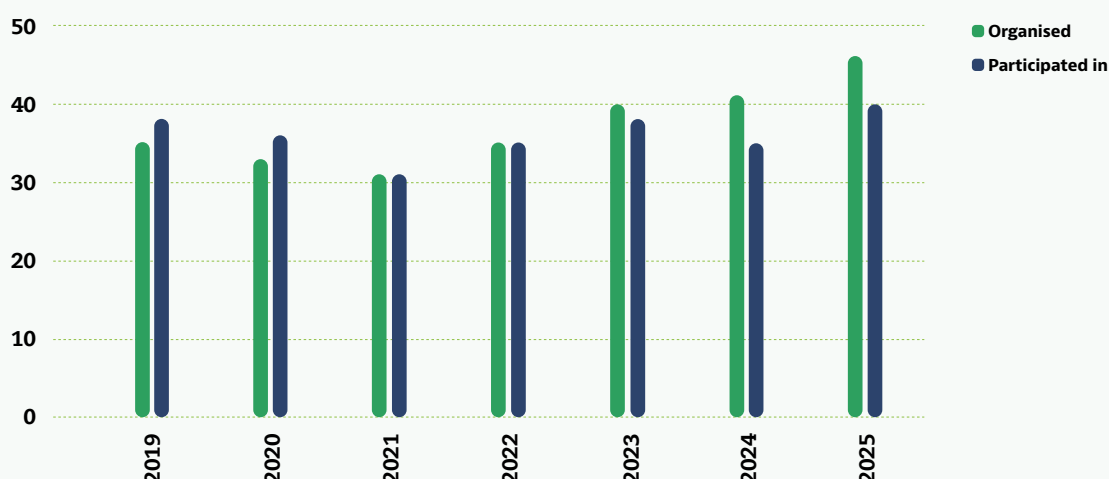
88%

A record-breaking 88% of NCPs organised or co-organised events in 2025

Despite receiving a record number of specific instance submissions, NCPs maintained high levels of promotion in 2025. Forty-six NCPs organised or co-organised 214 events and 40 NCPs participated

in 208 events organised by others. The number of NCPs engaging in promotional activities reached a record high. In 2025, 88% of NCPs organised or co-organised events, compared to 75% in 2024. This reflects a broad distribution of promotional efforts across the NCP Network.

Number of NCPs that organised or participated in events



While a record number of NCPs engaged in promotional events, there were substantial differences in the number of events organised by each NCP, with 15 NCPs organising only one event during the year, while two NCPs organised more than ten events during the year.

Number of events organised by NCPs in 2025

The NCP did not organise a promotional event in 2025.

Finland, Greece, Lithuania, Slovenia, Spain, Tunisia

1 event

Belgium, Croatia, Czechia, Denmark, Hungary, Iceland, Latvia, Mauritius, New Zealand, Türkiye, Uruguay, Jordan, Slovak Republic

2-4 events

Argentina, Brazil, Bulgaria, Costa Rica, Estonia, Germany, Ireland, Israel, Japan, Korea, Peru, Portugal, Romania, Sweden, United Kingdom, United States

5-10 events

Australia, Austria, Canada, Egypt, France, Italy, Kazakhstan, Luxembourg, Mexico, Morocco, Netherlands, Norway, Poland, Switzerland, Ukraine

11-15 events

Colombia

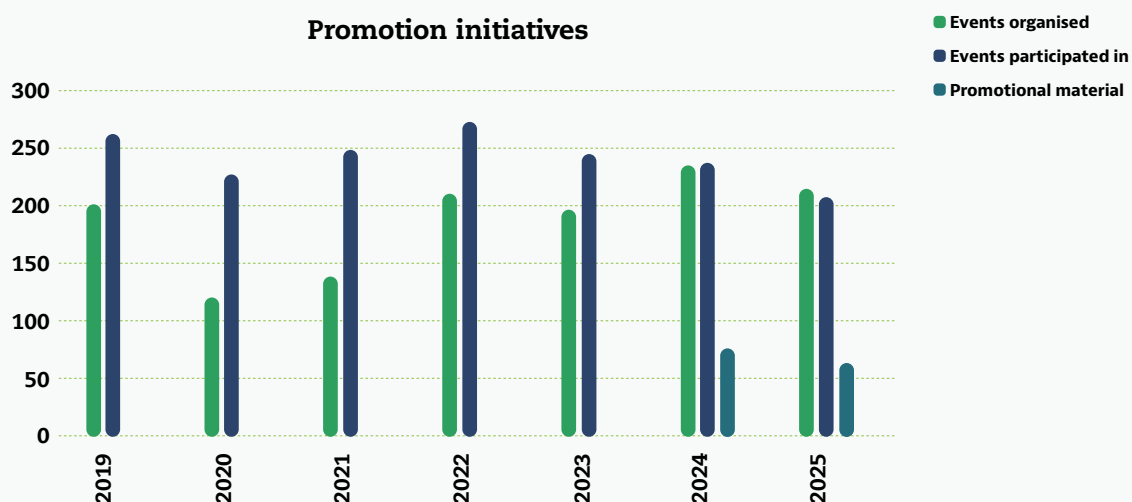
More than 15 events

Chile

Promotional events covered a wide range of topics, but often served for general presentations about the Guidelines, or focused on due diligence or human rights, as opposed to more technical or advanced topics. Despite the increase in the number of NCPs engaging in promotion, the number of events organised decreased slightly compared to

2024 and the number of events NCPs participated in was the lowest in the last eight years. The year also marked the first time that NCPs organised more events than they participated in, possibly pointing to more proactive promotional strategies or changes in how NCPs promote the Guidelines.

Promotion initiatives



42 000

NCP promotion reaches more than 42 000 people in 2025

Audience sizes varied, ranging from promotional events with less than ten attendees, to events with over 100 in attendance, reaching more than 18 000 people in total, similar to 2024.

When accounting for the additional audiences reached as reported in promotion beyond events (see below), the estimated number of people reached by promotional initiatives exceeds 42 000. Overall, this represents a high level of promotional activity despite a record-breaking year for specific instance submissions.

NCPs maintain strong online presence

In 2025, 50 NCPs had dedicated websites or webpages, which are key to NCPs' visibility, transparency and accessibility, and 31% of NCP websites underwent renovations during the year. In addition, 52% of NCPs reported using social media for promotional purposes, representing a slight increase from 42% in 2024; however, this remains an overall decrease

from the 59% of NCPs that reported using social media in 2023. Moreover, while some NCPs are very active, with eight NCPs posting more than 15 times per year, twelve NCPs reported posting only one to five times annually. NCPs mostly utilised LinkedIn, but also Facebook, X, and YouTube for promotion.

EXAMPLES of NCPs promoting RBC

Bulgarian NCP's website has an AI assistant to support users in navigating RBC

In December 2025, the Bulgarian NCP launched an AI Assistant chat box on the NCP's website. The assistant can respond to questions from website users and seeks to support the overall functionality of the NCP website.

Learn more: <https://bulgariancp.bg/en/>



NCP promotion embraces new tools while also promoting through traditional media outlets

Since 2024, NCPs report promotional activities beyond organisation of and participation in events. In 2025, 25 NCPs reported 64 promotional materials outside of events. This represents a slight decrease compared with 2024, when 27 NCPs reported 76 such materials. These promotional materials reached an estimated audience of around 24 000 people in 2025.

Of the 64 reported promotional works, brochures or similar (22%), newsletters (18%), and flyers (13%) were the most commonly reported types of work. NCPs have shown other creative ways to promote their work through promotional materials, such as video tutorials, weekly bulletins and newspaper advertisements.



Monthly bulletin released by the Mexican NCP

EXAMPLES of NCPs promoting RBC

Portuguese NCP develops video tutorials on thematic issues in the Guidelines

Throughout 2025, the Portuguese NCP published a series of video tutorials on various chapters of the Guidelines. The videos are published on the NCP's YouTube channel and are available in Portuguese with English subtitles. For example, the video tutorial dedicated to Chapter IV of the Guidelines focuses on Human Rights, clarifying the role of enterprises in preventing and managing adverse impacts throughout their activities and business relationships. The resource seeks to explain, in an accessible way, the international expectations regarding human rights due diligence, including the identification, prevention, mitigation and remediation of impacts, reinforcing the importance of integrating these principles into corporate governance and day-to-day business practices.

Source: <https://www.youtube.com/watch?v=QNC3VdIKRrA>



The Korean NCP publishes promotional ad in Korea Trade NEWS

In 2025, the Korean NCP collaborated with the specialised trade media outlet, *Korea Trade NEWS*, to incorporate references to the Guidelines and the Korean NCP ("KNCP") into a print and online version of the newspaper. The newspaper ad includes the NCP's logo and is distributed to a predominantly business audience.

Learn more: www.weeklytrade.co.kr



56%

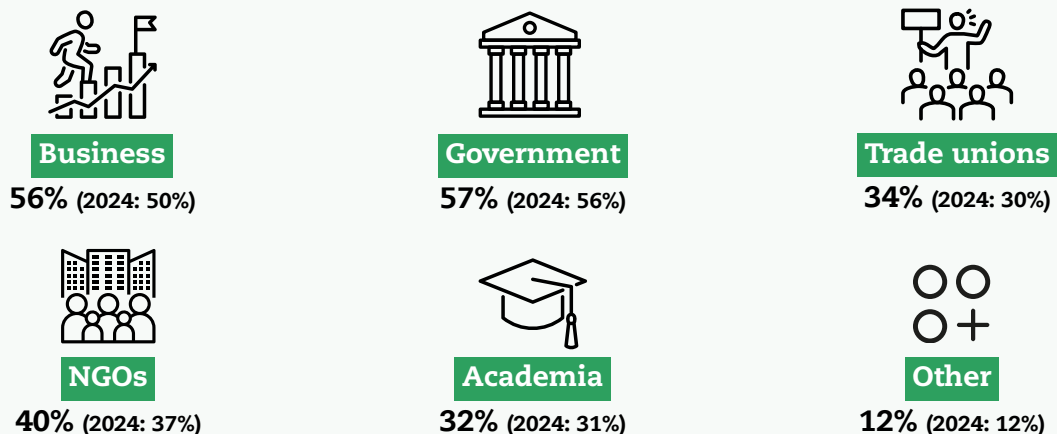
of NCPs have promotional plans, down from 67% in 2021

Business and government audiences remain the most targeted at NCP events

In 2025 like in 2024, NCPs have organised or co-organised more events addressed to government (57%) or business (56%) representatives than to trade unions (31%), NGOs (40%) and academia (32%), confirming the tendency across the Network to address promotion unevenly to different stakeholder groups. Government representatives are often included in general events that target other stakeholder groups, but are also targeted in meetings and events relating to promoting RBC policies and initiatives. Best practice in reaching diversified audiences has been the development of a promotion-

al plan. In 2025, 56% of NCPs reported having developed a promotional plan for the coming year(s), around half of which are publicly available on the respective NCPs' websites. This represents a slight increase from 2024, when 54% of NCPs reported having a promotional plan; however, it remains well below the 67% reported in 2021. Beyond potentially supporting engagement with diverse audiences, NCPs with promotional plans conducted an average of almost four more events per NCP compared to those without plans.

Target audience at events organised or co-organised by NCPs (2024-2025)



Note: Since events can be addressed to more than one stakeholder category, the total percentage exceeds 100%.

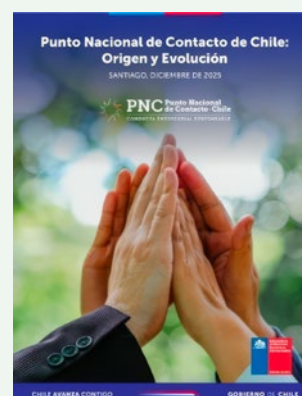
Chilean NCP promotes Guidelines in key sector for the national economy

On 24 October 2025, the Chilean NCP held a strategic meeting to promote RBC standards and enable strategies for RBC in the context of salmon farming, a key sector for Chile accounting for 2.1% of the GDP and which was involved in several specific instances. The conference welcomed business stakeholders and included promotion of the NCP and its functions, key international standards on RBC, key areas relating to RBC, such as stakeholder engagement, and the relevance of these instruments and principles in salmon farming.

And takes a look at the history and evolution of the NCP

In December 2025, the Chilean NCP published a document covering the origins and evolution of the NCP since its establishment. The document provides an overview of the history of the Guidelines, the creation of the Chilean NCP and its positioning in international and national contexts, and an overview of strengths, challenges, and opportunities for the NCP moving forward.

Source: https://www.subrei.gob.cl/docs/default-source/punto-nacional-de-contacto/pnc---origen-y-evolucion.pdf?sfvrsn=d10221c2_1



KEY TAKEAWAYS ON PROMOTION IN 2025

42 000 people reached by NCP promotional efforts

29% of NCPs organised one or fewer promotional events

88% of NCPs organised or co-organised events

56% of NCPs have promotional plans

3

Support for government efforts to promote RBC



According to the Guidelines, NCPs can lend support to their governments' efforts in the development, implementation, and coherence of public policies to promote RBC. This can include, for example, providing expertise on due diligence policies, or leading or participating in the development of national action plans and strategies on RBC. This role for the NCP is further supported by [the OECD Recommendation on the Role of Government on Promoting Responsible Business Conduct](#) (the Recommendation), which recognises the role that NCPs can play in promoting policy coherence for RBC.

NCPs remain actively involved in the development of RBC regulations and policies

An increasing number of adhering countries are adopting or developing RBC policies that reference the Guidelines, the OECD due diligence guidance, or the Recommendation on the Role of Government in Promoting RBC into regulations and policies¹. NCPs have been involved in this trend. Eighteen NCPs reported being involved in or consulted on the development of such regulations or policies, and nine NCPs reported that they are directly referenced in them or have been given a role in

their implementation. In general, 75% of NCPs reported that they follow and/or provide input, or are consulted, on policy or regulatory developments to promote RBC. NCPs can further contribute to an enabling policy environment for RBC through engagement with other government officials and agencies. In 2025, around 36% of NCPs reported promoting the Recommendation among relevant government officials, down from 2024, when almost half of NCPs reported doing so.

75%

of NCPs reported that they follow and/or provide input, or are consulted, on policy or regulatory developments to promote RBC

EXAMPLES of NCPs supporting government efforts to promote RBC

Japan revises its National Action Plan on Business and Human Rights

Japan's new NAP was finalised in December 2025 and covers the country's future policy work relating to business and human rights across eight priority areas. The priority areas cover a range of topics, such as thematic human rights issues, including risks relating to AI and technology. One priority area relates to access to remedy and includes the establishment of increased dialogue and engagement with stakeholders to strengthen the Japanese NCP. The Japanese NCP reported that it was involved in the development of the NAP and will also play a role in its implementation.

Learn more: https://www.mofa.go.jp/press/release/pressite_000001_01964.html



1. The Secretariat has mapped 21 legislative measures related to human rights, labour and environmental due diligence across 11 jurisdictions. <https://doi.org/10.1787/bac11241-en>

NCPs are involved in RBC cross-government coordination mechanisms

58%

of NCPs reported involvement in cross-government mechanisms regarding RBC policy areas

In 2025, just as in 2024, 30 NCPs (58%) reported involvement in cross-government coordination mechanisms regarding policy areas covered by the Guidelines and/or relevant for RBC. These coordination mechanisms covered the implementation of due diligence legislation, national action plans on business and human rights, sustainable development and environmental policy, trade and investment processes, and broader cross-government RBC co-

ordination. In some cases, the NCP acted as the coordination mechanism or led it. While engagement with other government officials can support the effectiveness of NCPs, some NCPs (17%) take it a step further by informing officials responsible for reviewing eligibility for government support and services, such as trade advocacy, economic diplomacy, export credits, or other benefits, of companies' involvement or engagement in specific instances.

EXAMPLES of NCPs supporting government efforts to promote RBC

NCPs meet to discuss their role in light of regulatory developments around RBC

At the June 2025 meeting of the NCP Network in Paris, NCPs discussed the changing landscape of RBC from a regulatory perspective. In light of developments regarding RBC and due diligence in Adherents and beyond, the session was a follow up to the discussion among NCPs on the implications of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD) for NCPs at the November 2024 NCP Network meeting. NCPs were invited to share their experiences navigating possible implications for NCPs in the changing regulatory landscape.



KEY NUMBERS ON NCP SUPPORT FOR GOVERNMENT EFFORTS TO PROMOTE RBC

58% of NCPs reported involvement in cross-government mechanisms regarding RBC policy areas

75% of NCPs follow and/or provide input, or are consulted, on policy or regulatory developments to promote RBC

36% of NCPs reported promoting the Recommendation on the Role of Government to relevant officials

4

NCP governance structures



NCP governance structures, or ‘institutional arrangements’, refer to the structuring and operations of an NCP, including how they engage with or incorporate stakeholder participation. Governments have flexibility in how they structure their NCPs so long as they make available the human and financial resources necessary for the NCP to fulfil their responsibilities in a way that meets the effectiveness criteria of visibility, accessibility, transparency, accountability, impartiality and equitability, predictability, and compatibility with the Guidelines. NCPs must also have the active support of stakeholders.

NCP structures in 2025

20 Single agency NCPs

The NCP is composed of one official in a single ministry, or by a group of officials belonging to the same service in the same ministry.

11 Inter-agency NCPs

The NCP is composed of a group of representatives from several ministries or government agencies, usually with a Secretariat located in one of these ministries, composed of one or more officials.

14 Multipartite NCPs

The NCP is composed of a group of government officials and stakeholder representatives, usually with a Secretariat located in one of the government agencies represented in the NCP.

4 Expert-based NCPs

The NCP is composed of experts who are appointed by, but external to, the government.

3 Hybrid NCPs

Composed of elements derived from different models above.

Note: Some NCPs choose to support their main structural body with a multi-stakeholder or interagency advisory body. In 2025, 36 NCPs have one or more advisory bodies (including 16 Single Agency NCPs and 9 Inter-Agency NCPs).

NCP staff resources increased slightly across the Network in 2025, but remain unevenly distributed

A common challenge faced by NCPs throughout the years is securing sufficient human and financial resources, which in some cases has limited the ability to effectively fulfil responsibilities. Similarly to 2024, the proportion of NCPs operating with more than two full-time equivalent (FTE) staff accounted for 29% of the Network in 2025. Meanwhile, the share of NCPs operating with one or fewer FTE staff decreased from 41% to 38% in 2025. The overall number of FTE staff increased from 83 to 93 in 2025.

However, these increases were not equally felt across the Network as the least well-resourced NCPs operated with 0.1 FTE, while the most-resourced NCPs operated with 7 FTE. On average, NCPs operated with 1.79 FTE staff per NCP. In some cases, the higher resources for some NCPs followed an increase in workload, such as related to specific instance handling, or followed a recommendation in a peer review. This is a challenge in achieving functional equivalence of NCPs, as a sizeable portion of the NCP network continues to operate with much lower resources than needed in order to achieve functional equivalence.

FTE staff resources available to NCPs in 2025

Less than 1 FTE	Argentina, Estonia, Finland, Greece, Iceland, Jordan, Latvia, Lithuania, Morocco, New Zealand, Slovak Republic, Spain, Sweden, Tunisia, Uruguay
1 FTE	Austria, Belgium, Hungary, Mauritius, Romania
1 to 2 FTE	Brazil, Bulgaria, Colombia, Costa Rica, Czechia, Denmark, Egypt, Germany, Israel, Italy, Japan, Luxembourg, Mexico, Slovenia, Switzerland, Türkiye, Ukraine
2 to 3 FTE	Canada, Chile, Ireland, Kazakhstan, Norway, Peru, United States
More than 3 FTE	Australia, Croatia, France, Korea, Netherlands, Poland, Portugal, United Kingdom

Staff turnover continues to decline in 2025

50%

of NCPs reported staff turnover in 2025

Beyond the total number of staff, staff turnover may impact the effectiveness of NCPs. Staff turnover remained high in 2025 but decreased compared to the previous two years, dropping from 65% in 2023 to 50% in 2025. More NCPs reported staff joining (48%) than reported staff leaving (40%) in 2025, and NCPs overall were operating with more staff, and a more stable staff, than in previous years.

Nevertheless, one-fourth (25%) of NCP staff were new to their roles in 2025. High staff turnover can strain institutional memory, disrupt continuity in ongoing cases, require NCP resources for training, and weaken stakeholder relations if contacts are not maintained. This can pose a particular problem for low-resourced NCPs that do not have additional staff available to adequately onboard new staff.

NCPs continue good practice of including stakeholders in their structures in 2025

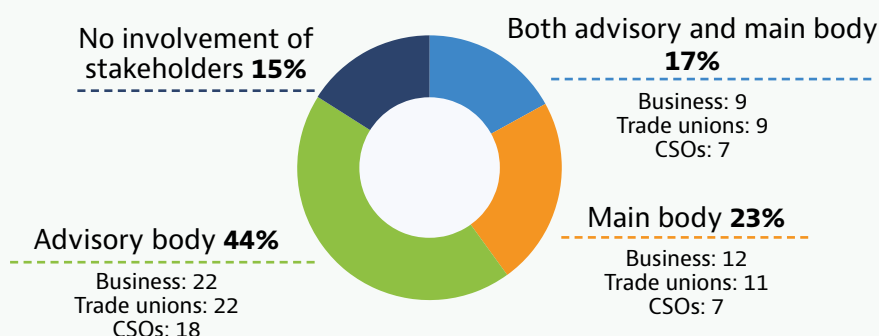
Including stakeholders into their governance structure—whether through membership in the NCP's main body or a multi-stakeholder advisory body—has proven important for the effectiveness of NCPs, as it increases stakeholder confidence, as well as access to expertise. In 2025, 85% of NCPs included stakeholders in their governance structure, as

compared to 83% in 2024. This continues the trend of NCPs increasingly including stakeholders in their structures, notably as this aspect was reinforced in the updated Guidelines. CSOs are underrepresented in NCP structures compared to other stakeholder groups as business is included in the structure of 43 NCPs, trade unions 41 NCPs, and CSOs 33 NCPs.

85%

of NCPs include stakeholders in their structures

Stakeholder (SHs) involvement in NCPs' governance structures



KEY NUMBERS ON NCP GOVERNANCE STRUCTURES

85% of NCPs include stakeholders in their structures

93 FTE staff in the Network, up from 83 in 2024

More than one-third of the NCP Network operated with one or fewer FTE

50% of NCPs reported staff turnover in 2025

5 Peer reviews and capacity building

NCPs have to achieve ‘functional equivalence’, or in other words, all NCPs have to operate with an equivalent degree of effectiveness. Effectiveness of NCPs is defined according to the following criteria: visibility, accessibility, transparency, accountability, impartiality and equitability, predictability, and compatibility with the Guidelines. In order to achieve this, under the supervision of the OECD Investment Committee and its Working Party on Responsible Business Conduct, NCPs regularly engage in peer reviews and capacity building activities, such as biannual NCP network meetings, or other training activities.

Representatives of the NCP Network and OECD Secretariat after the October 2025 NCP Network meeting



Peer reviews

From 2009 to 2024, NCP peer reviews were conducted on a voluntary basis. The 2023 update of the Guidelines introduced mandatory periodic peer reviews. In 2024, the Working Party on Responsible Business Conduct (WPRBC) adopted Modalities for the Peer Review of National Contact Points for Responsible Business Conduct, which set out rules and procedures governing peer reviews. In 2025, the cycle of mandatory peer review was launched.

Eight peer reviews were launched in 2025 with fifteen NCPs joining as members of peer review teams. These reviews will conclude in 2026 with the publication of the peer review reports.

NCP under review	Peer reviewer NCPs
Belgium	Mauritius, Sweden
The Netherlands	Denmark, Lithuania
Norway	Luxembourg, United States
Argentina	Chile, Romania
Uruguay	Chile, Finland
Austria	Bulgaria, Spain
Switzerland	Iceland, United Kingdom
Italy	Canada, Croatia





NCPs of Denmark, Lithuania, and the Netherlands, together with the OECD Secretariat at the peer review of the Dutch NCP.

90%

of peer review recommendations were fully or partially implemented one year after report publication

Concluding the 2009-2024 cycle of voluntary peer reviews, in 2025, two new NCP peer review reports were finalised¹, concluding the cycle of voluntary peer reviews. The reports included a total of 17 recommendations made by peer reviewer NCPs to strengthen the NCPs under review. Recommendations

included increasing staff resources, developing a handover strategy to address staff turnover, increasing strategic promotion to enhance visibility of the NCP, developing a stakeholder advisory body or other avenue for increased stakeholder engagement, and updating case-handling procedures in consultation with stakeholders.²

Eight NCPs reported back in 2025 on progress made to implement 68 recommendations since their peer review reports were published in 2024.³ Reporting

back highlighted actions NCPs have taken to further the implementation of the Guidelines, such as establishing an independent unit for the NCP, establishing an advisory board to enable stakeholder engagement, and renovations around NCP websites for low-resource high-impact promotion. Upon reporting back, 36 (53%) recommendations had been fully implemented, 25 (37%) had been partially implemented, and seven (10%) had not been implemented. This represents double the share of unimplemented recommendations compared to 2024 when 5% of recommendations had not been implemented. Some recommendations that NCPs have struggled to implement included those regarding structural changes and resource increases. Considering the implemented recommendations, this demonstrates the efficacy of the peer review system to trigger improvements of NCPs, although NCPs have not always been able to obtain more resources (see above).

1. Finland and Israel. The reports are publicly available at <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/national-contact-point-peer-reviews.html>

2. Key findings and recommendations for peer reviews published in 2025 are available in Annex C of the data [annex](#).

3. Estonia, Hungary, Iceland, Kazakhstan, Poland, Romania, Slovak Republic (2nd time reporting back), Türkiye.

Other capacity-building and peer-learning activities

NCPs regularly engage in peer learning and capacity building to increase their effectiveness and stay ahead of the curve. In 2025, six NCPs reported hosting a peer-learning activity and 21 NCPs reported participating in a peer learning activity hosted by another NCP. Additionally, 32 NCPs reported participating in

or hosting a meeting of a regional network of NCPs. NCPs indicated priority areas for future capacity building, such as addressing case submissions generated by AI, handling cases concerning individual labour disputes, and obtaining promotional support, such as on social media.



NCPs of Kazakhstan and Morocco together with a representative of the OECD Secretariat at their mentoring kick-off meeting.

Launch of NCP mentoring programme to help close the gaps in functional equivalence between NCPs

The third Action Plan to Strengthen National Contact Points for Responsible Business Conduct, covering 2025 to 2027, included addressing the gaps in achievement of core effectiveness criteria across the NCP Network. One activity to address this priority area was the creation of a mentoring program so NCPs can receive support from more experienced peers on a voluntary basis. NCPs applied to the program to act as mentor or mentee and provided details on the areas for which they sought or could provide support.

The programme was proposed to the NCP Network at its meeting in June 2025 and the first meetings of matched mentoring pairs took place alongside the October 2025 meeting of the NCP Network.

[https://one.oecd.org/document/DAF/INV\(2024\)33/FINAL/en/pdf](https://one.oecd.org/document/DAF/INV(2024)33/FINAL/en/pdf)

EXAMPLES of NCPs engaging in peer reviews and capacity building

Meetings of the NCP Network in 2025

The NCP Network met virtually in June 2025 and in-person in Paris in October 2025. The June meeting spanned two days and covered topics such as encouraging companies to engage with NCPs, developing model terms of reference for mediation, managing parallel proceedings in specific instances, ensuring functional equivalence and distribution in specific instances across the Network, updates on regulatory developments on RBC, and implementing the new Action Plan to Strengthen NCPs.

The October meeting of the Network enabled dialogue with stakeholders on terms of reference for mediation, coordination among NCPs in specific instances, and on responsible disengagement. The meeting further provided an onboarding session for new NCP officials, a confidential space for NCPs to discuss specific instances, and space for NCPs to convene in their regional networks.



KEY TAKEAWAYS ON PEER REVIEWS AND CAPACITY BUILDING IN 2025

90% of peer review recommendations were fully or partially implemented one year after peer review completion

5% increase in unimplemented recommendations



2025, a year of progress 2026, a year of opportunities

In 2025, NCPs demonstrated how far they have come, 41 years since their creation, and 25 years since the addition of the NCP grievance mechanism. Across their range of activities, 2025 proved to be a record-breaking year for NCPs. Most notably, while it took six years for the Network to receive its first 100 cases, NCPs surpassed that in a single year in 2025. This suggests increased visibility for the mechanism, but it also leads NCPs to a new set of challenges in the years to come, for example relating to workload in the face of stubbornly insufficient resources, and complications relating to a surge in individual submissions. Beyond numbers, cases received in 2025 demonstrate how NCPs are being turned to to respond to emerging priorities in a changing RBC-landscape. The increase in submissions relating to the information and communication sector is an indication of these expectations. While previous years have shown NCPs do not always have available resources to conduct high levels of promotion when case submissions are high, 2025 showed strong efforts on both fronts, with record numbers of NCPs being able to do both. Indeed, several NCPs were structurally reinforced in 2025 with an increase in staff and stakeholder inclusion in NCP governance structures, though several NCPs also continued to struggle with insufficient resources and access to expertise. Following the closure of the voluntary peer review system in 2024, 2025 also marked the launch of the new mandatory periodic peer review system. Following important progress achieved under the voluntary reviews, the new strengthened system will further provide chances for NCPs to celebrate their achievements, and to strategically look at where they fall short of the core effectiveness criteria and need to work to achieve functional equivalence across the Network. With an eventful year in the rearview mirror, 2026 is primed with many exciting opportunities for NCPs if they can overcome their challenges.

A separate document containing the entirety of the data reported by NCPs can be accessed in the online [annex](#).



OF RESPONSIBLE BUSINESS CONDUCT



**For more information,
please contact: rbc@oecd.org**

Additional resources

Read the OECD Guidelines for Multinational Enterprises on
Responsible Business Conduct: <https://doi.org/10.1787/81f92357-en>



This work was approved and declassified by the Investment Committee on 15 June 2026.

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