

ABBREVIATED
GUIDELINES FOR CIVIL SOCIETY ORGANIZATIONS ENGAGING WITH ICT COMPANIES
OPERATING IN CONFLICT AFFECTED AND HIGH-RISK AREAS [2025]

GENERAL INTRODUCTION

PART I: CONFLICT-AFFECTED AND HIGH-RISK AREAS (CAHRA), *excluding armed conflict*

Introduction

GUIDELINE 1: Develop an informed strategy for approaching an ICT company operating in Conflict-Affected and High-Risk Areas [CAHRA], and for engaging effectively with its relevant representatives.

1. Define your overall goals strategically and set reasonable expectations for each company engagement activity to avoid frustration and early abandonment of your strategy.
2. Do your homework and be well-informed about local government laws, rules, regulations, and policies that govern the company's operations and that affect the community's human rights.
3. Research the target company as well as pertinent personnel; understand its operating landscape to develop an impactful strategy.
4. Conduct a full risk assessment of your engagement strategy before deploying it.

GUIDELINE 2: Establish professional and personal relationships with the company and individual company representatives.

1. Engage cordially and constructively with companies. Aim to collaborate.
2. Build trust with company representatives.
3. Recognize that your role as local expert and community representative may include helping to educate company counterparts with respect to the realities on the ground.

GUIDELINE 3: Become an indispensable and trusted resource for the company by engaging with it on existing eHRDD and HRIA processes, consulting as information sources, and monitoring the company's progress on all fronts.

1. In the alternative, where there is a lack of meaningful engagement opportunities within and around company eHRDD processes, consider conducting your own shadow or community-led human rights impact assessments, to produce independent analyses for company and public audiences.

GUIDELINE 4: Forge and leverage solidarity across non-company stakeholders with similar goals and objectives. Build networks among like-minded CSOs and engage with other stakeholders to advocate for company actions *collectively*.

1. Think broadly and inclusively about non-company stakeholders to reach out to when networking, building alliances, or coordinating.
2. Coordinate and organize with other CSOs in coalitions and networks.
3. Coordination with other CSOs and stakeholders does not mean you have to present a single voice on all issues.
4. Coordinating efforts through coalitions and networks has many beneficial effects.

PART II: DURING ARMED CONFLICT

Introduction

GUIDELINE 1: CSOs should adapt and reinforce their security protocols, including for their members, in response to the escalating conditions of conflict; by the same token, assess and promote the safety of users and communities affected by the products and services of ICT companies operating in armed conflict.

1. Prioritize the safety of CSO members, infrastructure, and constituencies and implement measures to protect them.

GUIDELINE 2: Confirm or advocate that companies operating in armed conflict carry out “enhanced” human rights due diligence (eHRDD) that is informed by local experts who can advise the company’s conflict sensitivity analyses, risk assessments and other processes as appropriate

1. Ensure that companies have eHRDD policies with not just human rights but also international humanitarian law (IHL) norms in place.
2. Assist companies as the exigent circumstances require at every step of the eHRDD process.
3. Advise ICT companies to prevent their platforms, services, or products from being used to contribute to human rights and IHL violations and to proscribe users who promote, commit, or contribute to committing, human rights or IHL abuses.
4. Contact companies with constructive feedback on their eHRDD policies in practice, especially regarding IHL protections.

GUIDELINE 3: Advocate with companies for adopting an equitable, fair, and consistent approach to operating in situations of armed conflict and crises, to avoid appearing partisan or being perceived as supporting partisan positions.

1. When engaging with ICT companies during conflict, CSOs should recommend that, to the maximum extent feasible, they take measures to avoid participating directly in the hostilities or harming civilians.
2. Civil society expects companies to have a standardized and consistent response to crises and conflicts.
3. CSOs should also look to understand how the company may have responded fairly and effectively to recent conflicts in other regions and advocate for similar actions.

GUIDELINE 4: Be available for meaningful, direct, and concurrent engagement with companies operating in times of armed conflict whether or not it takes place within the eHRDD framework.

1. Make yourself available for ongoing communication regardless of the context.
2. Seek to establish contact with the ICRC which operates in conflict zones across the world.
3. Develop partnerships with other CSOs to engage with companies collaboratively in times of crisis and present a unified front in your advocacy.
4. Consider creating a dedicated communication channel to monitor updates/requests for engagement.
5. Be strategic in balancing private conversations and public campaigns.

PART III: AFTER ARMED CONFLICT OR CRISIS

Introduction

GUIDELINE 1: Advocate for a transitional phase before the company stops policies that were active during armed conflict.

1. Engage with companies to influence and assist in the formation of just post-conflict policies.

GUIDELINE 2: Advocate for companies to continue to conduct eHRDD to identify, mitigate, and address negative human rights impacts throughout the lifecycle of conflicts and crises.

GUIDELINE 3: Encourage cooperation with judicial accountability mechanisms, and otherwise support transitional justice initiatives designed to ensure redress and avoid the recurrence of armed conflict.

GUIDELINE 4: Reflect on the effectiveness of measures taken during times of crisis, and how to support conflict reduction policies and practices to avoid relapses.

