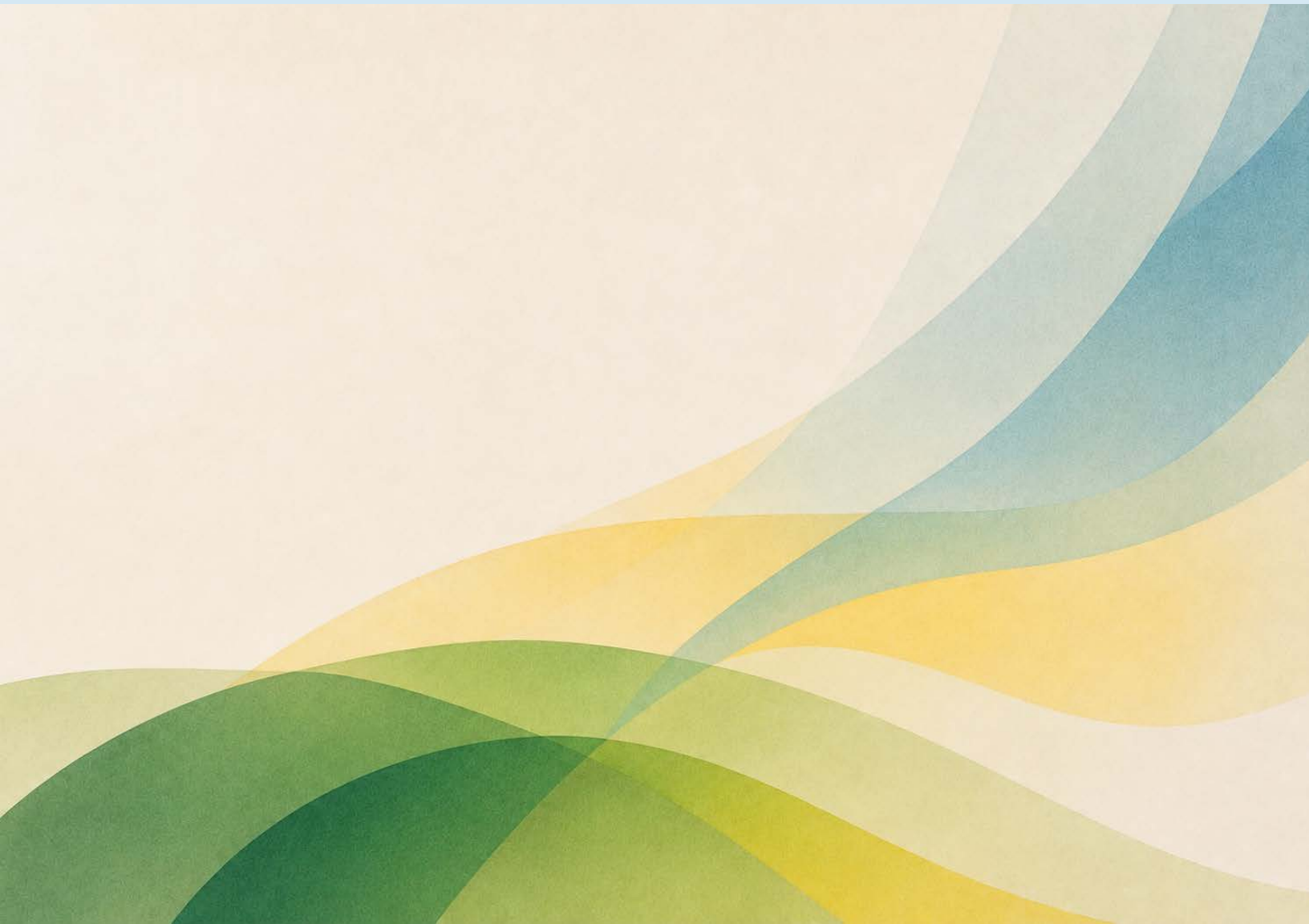
Trade Union
Advisory Committee
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# Policy Brief

## Responsible Business Conduct for a Just Transition



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# Policy Brief

## Responsible Business Conduct for a Just Transition

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## Overview

In May 2026, the OECD released a new Guidance entitled "Responsible Business Conduct for a Just Transition: Protecting Workers, Communities and Consumers in the Low-Carbon Transition", providing concrete guidance on how businesses should prevent, address and remedy actual and potential adverse social impacts of their climate policies and green transition.

This new guidance sets out the "Key Actions" that multinational enterprises (MNEs) could and should take to advance a just transition in line with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the "OECD Guidelines"). This is the most authoritative legal instrument in this field at global level and covers all key areas of corporate accountability and responsibility, including human and labour rights, environment, governance, bribery, disclosure, science and technology, competition and taxation.

The OECD Guidelines, as part of the OECD Declaration on International Investment on Multinational Entreprises, are currently adhered to by 52 countries, including non-OECD members.[1] To provide more information on the OECD Guidelines, and explain how they can be used to promote workers' rights and seek remedy, TUAC has developed a guide to support trade unions in the use of this instrument, including its grievance mechanism - the National Contact Points (NCPs).

### OECD Key Actions for MNEs to manage the social impacts of the transition

(OECD Guidance, "Responsible Business Conduct for a Just Transition")[2]

**1 Taking an integrated approach to transition planning and implementation**

- Breaking operational silos
- Developing integrated transition policies, strategies, and performance indicators
- Setting the tone from the top
- Clarifying terminology

**2 Applying a place-based dimension and considering cumulative impacts in identifying and prioritising impacts**

**3 Engaging meaningfully with stakeholders**

- Adapting approaches across stakeholder groups
- Navigating diverging stakeholder views

**4 Addressing impacts through individual and collaborative approaches**

- Engaging with government
- Multistakeholder and industry collaboration
- Collaborative and blended finance mechanisms
- Supporting responsible consumer practices

**5 Designing and implementing benefit-sharing models**

**6 Promoting continuous improvement and practicing responsible disengagement**

- Deciding to disengage as a last resort
- Disengaging or exiting responsibly

1 List of adherent countries may be consulted here: OECD Legal Instruments

2 OECD (2026), Responsible Business Conduct for a Just Transition: Protecting Workers, Communities and Consumers in the Low-Carbon Transition, OECD Publishing, Paris, https://doi.org/10.1787/ea041d32-en.

Several OECD "Key Actions" are directly relevant to trade unions, such as Key Action 3 - meaningful stakeholder engagement – and the OECD Guidance recognises the centrality of protecting workers and labour rights in the green transition, as well as the essential contribution of collective bargaining and social dialogue at every stage of the transition:

> "Engaging with workers and their representatives is central to better identify, prevent and mitigate the potential adverse social impacts of the transition, including in the design of transition plans, but also prior to and during potential disengagement phase."[3]

This TUAC Policy Brief seeks to support workers' engagement in the just transition at company level and help unions leverage on the OECD Key Actions. It provides practical guidance on how trade unions can advocate for a just transition at corporate and supply chain level. In complement to existing tools such as the ITUC Trade Union Guide: Applying human rights due diligence in the workplace to achieve a Just Transition as well as the ITUC-IndustriAll Global and IndustriAll Europe Manifesto on just transition in the garment sector, it provides resources for unions to use the OECD Guidelines. As such, it shows that (1) a **just transition is a right for workers**, (2) it is **a necessity** and (3) is also **practically achievable.**

## 1 A JUST TRANSITION IS A RIGHT FOR WORKERS, NOT A POLICY OPTION FOR BUSINESSES AND GOVERNMENTS:

the OECD report embeds workers' fundamental rights to freedom of association and collective bargaining in the design and implementation of transition plans. It refers to multiple binding and authoritative legal instruments setting out the obligations that rest upon governments - and businesses - when navigating the transition, in particular:

International labour standards, including the ILO 1998 declaration on fundamental principles and rights at work, which set out obligations to respect, protect and realise fundamental labour rights, irrespective of whether a country has ratified relevant ILO Conventions.

The Paris Agreement adopted in 2015, which underlines the "imperatives of a just transition of the workforce" in its Preamble.

The ILO Guidelines for a just transition towards environmentally sustainable economies and societies for all (2015), reaffirmed in the 2023 ILO Resolution concerning a just transition towards environmentally sustainable economies and societies for all

The OECD Guidelines which contain explicit provisions on the responsibility of MNEs to "contribute to economic, environmental and social progress" (Chapter II, para. 1), but also "avoid causing or contributing to adverse impacts [...] and address such impacts when they occur, including through providing for or co-operating in the remediation of adverse impacts." (MNE Guidelines, Chapter II, para.12).

3 OECD (2026), Responsible Business Conduct for a Just Transition: Protecting Workers, Communities and Consumers in the Low-Carbon Transition, OECD Publishing, Paris, https://doi.org/10.1787/ea041d32-en, page 20.

## 2 A JUST TRANSITION IS AN ECONOMIC, SOCIAL AND ENVIRONMENTAL NECESSITY:

there is ample evidence that, if not managed properly, the green transition can widen inequality and therefore raise additional obstacles to climate action and the urgent shift towards net zero economies.[4] In particular, OECD research shows that while the green transition may create new jobs, these will not necessarily be in the same regions and sectors, require the same skills, nor be of the same quality (including in terms of employment protection and wages), thereby potentially leaving a significant share of workers behind. [5] Women and girls are disproportionately affected and gender equality should be at the centre of just transition policies. A just transition guaranteeing decent jobs, access to social protection and respect for labour rights, is needed to gather public support for the green transition and ensure a fair distribution of the costs and benefits of the transition. Beyond being a social, environmental and political necessity, a just transition is also economically beneficial.

- The OECD Key Actions show how a just transition can reduce operational, sourcing and reputational risks associated with the transition to lower-carbon business models. As such, trade unions may legitimately argue that a just transition can shift costs from reactive disruption (labour disputes, talent shortages, delays, reputational damage) to proactive adaptation (reskilling, redeployment, workforce planning through social dialogue).[6]
- Just transition policies underpinned by social dialogue are also key to prevent litigation and disputes. The Business and Human Rights Resource Centre's Just Transition Litigation Tracking Tool illustrates the growing trend of just transition litigation, with 17 cases filed in 2024, compared to ten in 2023. This trend shows how a well-planned corporate just transition policy, developed in close collaboration with trade unions, is an important tool for businesses to prevent and mitigate litigation risks.

## 3 A JUST TRANSITION IS ACHIEVABLE:

while the number of references to "just transition" in corporate financial and non-financial reporting has increased significantly in recent years, there are significant concerns around the integrity and actual implementation of these commitments. The OECD report however shows that a just transition can be achieved and highlights several examples of how businesses have taken measures to address the potential adverse social impacts of their environmental policies.

- This policy brief provides additional resources, including a non-exhaustive list of databases, emerging practices and existing collective bargaining and global framework agreements, that may support unions in their engagement at corporate and supply chain level.
- It also includes useful guidance on how to develop transparent, operational and trackable just transition metrics, as well as key performance indicators which unions can use in the just transition planning phase.

4 See for instance Chancel, L., Gómez-Carrera, R., Moshrif, R., Piketty, T., et al. World Inequality Report 2026, World Inequality Lab. World Inequality Report 2026

5 OECD (2024), OECD Employment Outlook 2024: The Net-Zero Transition and the Labour Market, OECD Publishing, Paris, https://doi.org/10.1787/ac8b3538-en.

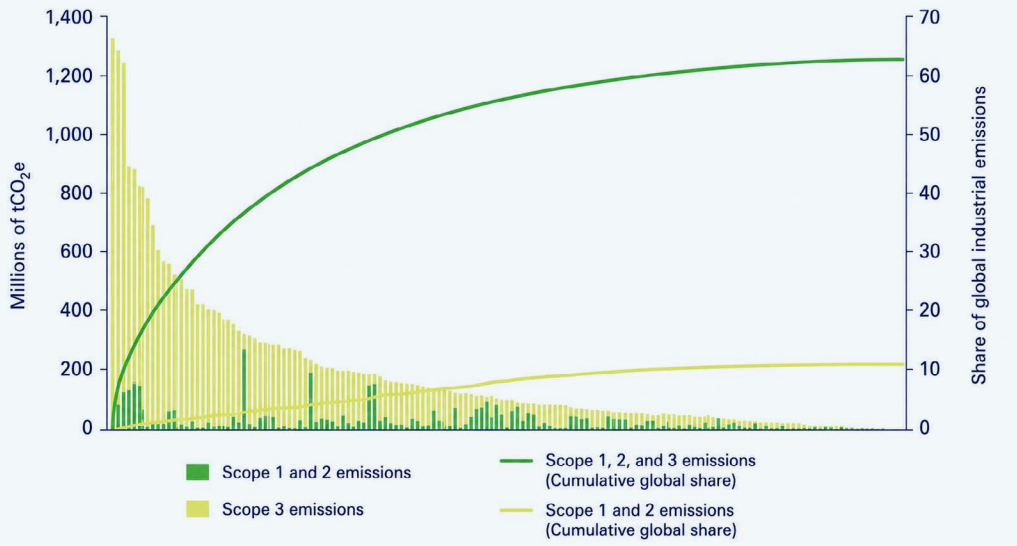
6 Several studies show that a just transition is actually affordable, for instance in the garment sector, where the costs of a 60% reduction in greenhouse gas emissions is estimated at only 1-2% of annual revenues. See https://www.mckinsey.com/industries/retail/our-insights/sustainable-style-how-fashion-can-afford-and-accelerate-decarbonization

## 2. Corporate accountability in the green transition: the urgent need of a truly just transition in global supply chains

A small number of MNEs are major drivers of global greenhouse gas (GHG) emissions. According to a 2023 report by the World Bank, the direct activities and supply chains of 157 large MNEs combined account for up to 60 percent of total global industrial emissions **(Graph 1)**. While 10 percent of this comes from MNEs' direct activities (scope 1 and 2 emissions), their supply chains account for another 50 percent of global emissions (scope 3).[7]

**Graph 1:**

### Share of greenhouse gas emissions of large multinational enterprises




**Source:** World Bank calculations based on CDP 2022a and OECD 2023.

**Note:** Scope 1 emissions are direct emissions from owned or controlled sources. Scope 2 emissions are indirect emissions from the generation of purchased electricity, steam, heating, and cooling consumed by the firm. Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in the firm's value chain (see "Bottom-Up Approaches to Estimate the Effect of MNEs on Carbon Emissions" in chapter 2). A total of 157 companies are identified based on Climate Action 100+. Each bar represents one MNE, while the lines show their own emissions as cumulative shares of global industrial emissions. CDP = formerly Carbon Disclosure Project; $CO_2e$ = carbon dioxide equivalent; GHG = greenhouse gas; MNE = multinational enterprise; OECD = Organisation for Economic Co-operation and Development; t = tons of $CO_2$.

This extremely high concentration shows the strategic importance of acting at supply chain level to accelerate climate action and advance a just transition. Evidence also shows that current commitment to decarbonisation from these MNEs is far from sufficient.[8]

While a shift to clean energy and decarbonised production needs to accelerate across these key supply chains, the negative impact on workers and jobs may also increase if no appropriate measures are taken to guarantee respect for labour rights in the transition. The OECD report shows that many companies still treat climate transition planning as a predominantly environmental or financial exercise, with social issues addressed later or in parallel, rather than embedded from the outset.

In recent years, references to "just transition" as a climate action framework have markedly increased, not only in governments' Nationally Determined Contributions (NDCs)[9], but also in corporate financial and non-financial reporting **(Graph 2)**.

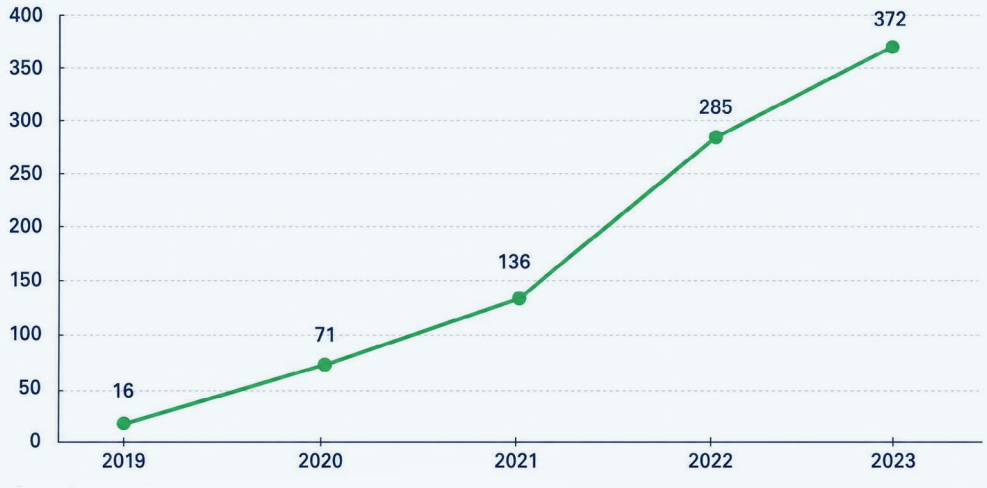
7 Steenbergen, Victor, and Abhishek Saurav. 2023. The Effect of Multinational Enterprises on Climate Change: Supply Chain Emissions, Green Technology Transfers, and Corporate Commitments. Washington, DC: World Bank. doi:10.1596/978-1-4648-1994-0.

8 The Climate Action 100+ database tracks commitments from the largest MNEs and provides a benchmark of existing decarbonization and green transition plans: Climate Action 100+

9 The most recent analysis from the ILO shows a marked increase in both the visibility of just transition and the attention given to the concept. Explicit references to "just transition" appear in 79 per cent of NDC 3.0 submissions, up from 50 per cent in the previous cycle. See ILO, Mapping just transition in NDCs 3.0 - global trends: Insights from 123 countries, Geneva: International Labour Office, 2025. © ILO.

**Graph 2:**

## Number of mentions of just transition considerations in corporate reports




**Source:** Datamaran Ltd. (based on an assessment over 2,000 listed companies).

Recent OECD research, however, clearly shows that while references to just transition are increasingly common in corporate climate strategies and sustainability reporting, implementation is very often absent or, at best, extremely limited.[10]

Respect for workers' rights (including ILO Convention n°111 on non-discrimination) and engagement with trade unions should be a pre-requisite for any policy to be labelled as "just transition". Concerns are however rising about "just transition washing," with few corporate policies translating into concrete actions and corporate commitments often being misaligned with basic labour standards.

A recent Net Zero Company Benchmark Report 2025 demonstrates that only 1% of companies have fully committed to the principles of just transition and disclosed how they plan for and monitor progress towards a just transition. In an analysis of the credibility and integrity of just transition plans of 2000 companies, the World Benchmarking Alliance and Just Transition Finance Lab recently found that the social impacts remain poorly integrated in transition planning, while engagement in social dialogue is extremely scarce. Only 6% of 399 companies assessed in 2024[11] were partially planning for a just transition, dropping to 0% when looking for full implementation, i.e. establishing social dialogue mechanisms and time-bound targets to protect workers, consumers and suppliers from the impacts of a low-carbon transition **(Graph 3).**

10 See e.g. OECD (2024) Key Issues Note for the 2024 G20 Sustainable Finance Working Group (SFWG), "Advancing Robust, Credible and Just Transition Plans"; OECD (2023), "Unpacking public and private efforts on just transition", OECD Policy Insights on Well-being, Inclusion and Equal Opportunity, No. 9, OECD Publishing, Paris, https://doi.org/10.1787/cbd31b13-en.

11 For further overview of these companies see Home | World Benchmarking Alliance

**Graph 3:**

## Level of company readiness on just transition across indicators

| | Depth of just transition integration | Social dialogue and stakeholder engagement | Planning for a just transition | Green and decent job creation | Retaining and re- and/or upskilling | Social protection and social impact management | Advocacy for policies and regulation supporting a just transition |
|---|---|---|---|---|---|---|---|
| Companies that meet at least one of four elements | 25% | 5.3% | 30.8% | 50% | 6.1% | 5.1% | 5.1% |
| Companies that meet two -three of the four elements | 6.6% | 2% | 13.6% | 19.9% | 2.3% | 2.3% | 1.3% |
| Companies that meet all four elements | 1.5% | 0% | 0% | 0% | 0% | 0% | 0.3% |

**Source:** Datamaran Ltd. (based on an assessment over 2,000 listed companies).

The OECD Key Actions can contribute to addressing these major policy and implementation gaps, fostering transparency and corporate accountability while identifying expectations for businesses. The following sections highlight key strategic areas of intervention for trade unions.

# 3. Leveraging on the OECD Key Actions to advance a Just Transition through Responsible Business Conduct

In light of the major policy and implementation gaps described above, it is critical to ensure that unions:

| | |
|---|---|
| **DEMAND** | the full engagement of trade unions in the just transition planning and implementation process; |
| **FOSTER** | the early adoption of just transition plans (JTPs), based on detailed metrics; |
| **MONITOR** | the implementation of such plans and their full integration in companies' due diligence frameworks; |
| **BE ACTIVELY INVOLVED** | when disengagement from a supplier is considered by a company due to the environmental impacts of the activities concerned; |
| **DEMAND** | appropriate remedy and access grievance mechanisms in case of violations of labour rights in the context of the green transition. |

## 3.1. Collective bargaining must be at the heart of just transition policies

Social dialogue and collective bargaining are central to a truly just transition and are at the heart of the 2015 ILO Guidelines. The requirement on businesses to meaningfully engage with stakeholders, including workers and their representatives, is also a key feature of the OECD Guidelines.

The OECD Guidelines call on businesses to "engage meaningfully with relevant stakeholders or their legitimate representatives as part of carrying out due diligence and in order to provide opportunities for their views to be taken into account with respect to activities that may significantly impact them [...]." (OECD Guidelines, Chapter II, para.15) Meaningful stakeholder engagement refers to "ongoing engagement with stakeholders that is two-way, conducted in good faith by the participants on both sides and responsive to stakeholders' views." (OECD Guidelines, Chapter II, Commentary para.28).

The OECD Key Actions on RBC for a Just Transition explicitly provides that "expectations around engagement are set out in international conventions", that "ILO Conventions n°87 and n°98 recognise that engagement with legitimate trade unions and workers' representatives should not be bypassed for other forms of engagement with workers and that freedom of association and the right to collective bargaining should be respected" (p. 20).

There is already a range of existing examples of collective bargaining agreements that can and should be built upon. The examples presented below can serve as important reference points for future action **(see Annex 1)**. As this list is non-exhaustive, further information and examples can be found on the following databases and trackers:

- The ITUC has launched a Just Transition Database and IndustriALL Europe has developed a dedicated website on just transition, which compiles European and company-level initiatives.
- Both the ILO and industriALL maintain databases of transnational company agreements, especially International Framework Agreements.
- For a broader collection of collective bargaining agreements, the WageIndicator database provides useful filtering options by country and allows users to track specific topics such as "New Technologies & Green clauses."
- The ILO Just Transition Policy Gateway is a global knowledge platform showcasing relevant policies, agreements and other initiatives.
- It is also advisable to consult official national legal databases. In France, for instance, the Légifrance platform enables users to search for specific terms (such as "transition écologique" or "transition juste") and filter results for industry-wide agreements and collective bargaining agreements. Similarly, in the United States, the Online Public Disclosure Room provides access to a wide range of private and public sector collective bargaining agreements.

## 3.2. Negotiating Just Transition Plans

The OECD Guidelines provide that "enterprises should conduct their activities in a manner that takes due account of the need to protect the environment, and in turn workers, communities and society more broadly, avoids and addresses adverse environmental impacts and contributes to the wider goal of sustainable development." (OECD Guidelines, chapeau Chapter V). The commentary further notes that "it is important for enterprises to assess and address social impacts in the context of their environmental management and due diligence activities and to take action to prevent and mitigate such adverse impacts both in their transition away from environmentally harmful practices, as well as towards greener industries or practices, such as the use of renewable energy." (OECD Guidelines, Chapter VI, Commentary para.70).

Together with the provisions mentioned in section 3.1, this constitutes an important legal basis for unions to advocate for the adoption of robust just transition plans at company and supply chain levels, developed in consultation with trade unions. The OECD Key Actions further stress that companies should break operational silos (including between human rights and climate action units) and engage with a broad range of actors, including workers, to develop integrated transition policies, strategies, plans, and performance indicators (page 10).

Some may argue that, unlike other ESG objectives, a just transition is difficult to measure, track and monitor. Recent examples, however, show the contrary; various sets of metrics have been developed, which enable companies to establish inter-operable, enforceable and measurable just transition plans. They include:

- Shift Just Transition Metrics (May 2026) provides a recent and comprehensive set of 19 quantitative metrics to help measure how efforts to tackle climate change are impacting on people, including workers and communities.[12]
- The Just Transition Finance Lab has also developed detailed just transition metrics in 2024. The Transition Plan Taskforce (TPT), established by the UK government during COP26, commissioned a report entitled Putting People at the Heart of Transition Plans: key steps and metrics for issuers. Beyond the evaluation of existing frameworks, the report offers a comprehensive collection of established indicators and best practices that can support the development and improvement of transition plans.
- While not focusing exclusively on the social impacts of the green transition, the Taskforce on Inequality and Social-related Financial Disclosures (TISFD) has developed a Framework with Recommendations for disclosure of people-related information by businesses and financial institutions.

## 3.3. Integrating Just Transition Objectives in the six steps of the due diligence process

The OECD Guidelines stress that "adverse environmental impacts are often closely interlinked with other matters covered by the Guidelines such as health and safety, impacts to workers and communities, access to livelihoods or land tenure rights" and that "carrying out environmental due diligence and managing adverse environmental impacts will often involve taking into account multiple environmental, social and developmental priorities." (OECD Guidelines, Chapter VI, Commentary para.70)

The OECD Due Diligence Guidance for Responsible Business Conduct adopted in 2018 sets out how companies should implement due diligence set forth by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The risk-based due diligence process relies on six steps **(see Graph 4).**

12 The metrics have been developed by Just Transition Metrics / Resources / People and Climate Action in Private Markets (PCAP)

**Graph 4:**

## OECD Due Diligence Process




**Source:** OECD

Each of these six steps can translate into concrete requirements to ensure a just transition:

### 01 Embedding RBC into the enterprise's policies and management systems.



To tackle the challenge of climate change, companies and their suppliers should include social considerations and a just transition dimension in their transition plans, outlining how their activity affects environmental concerns. These policies must be available to all and communicated to those workers and communities most affected by potential job loss and restructuring. It must also cover new decent and quality jobs, skills development, reskilling and training, social dialogue and collective bargaining and potential remedies as part of the company's climate transition. Workers and their unions should push for cross-functional groups to be created at company level to avoid operational silos (see Key action 1), for meaningful social dialogue and collective bargaining (see Key Action 3 and section 3.1 above) and adequate complaint procedures (see Section 3.5 below).

### 02 Identifying actual or potential adverse impacts.



It is imperative for companies to identify and map the negative impacts of their activities and determine which are the most severe. This step requires companies to detect where transition-related risks to workers, such as job displacement or unsafe working conditions, are most likely to occur. It also requires them to share a transparent assessment of the environmental impact and greenhouse gas emissions associated with each activity. Crucially, this includes consultation with workers and impacted stakeholders on potential risks, as well as continued engagement when proposing specific actions. The risks and actions should be clearly prioritised, meaning that the most severe impacts, such as disengagement, are placed ahead of those of lesser significance, for example temporary disruptions. The vulnerability of particularly impacted groups in the green transition must also be highlighted, namely women, workers in the informal economy, workers in regions with little economic diversification, indigenous peoples, etc.

## 03 Ceasing, preventing or mitigating adverse impacts.



As noted in the OECD Guidelines, enterprises should "assess and address social impacts in the context of their environmental management and due diligence activities and (...) take action to prevent and mitigate such adverse impacts both in their transition away from environmentally harmful practices, as well as towards greener industries or practices, such as the use of renewable energy." (OECD Guidelines, Chapter VI, Commentary para. 70). The social dimension cannot be considered as an afterthought of environmental policies. Concretely, this requires developing integrated just transition policies (see section 3.2 above), covering both negative impacts on the environment as well as effects on jobs, job quality and human rights. This includes creating a roadmap with forward-looking goals in terms of job creation and retention, including through reskilling and investment in green and decent jobs, and prioritising the most severe risks. A key element is the continuous consultation and dialogue with workers and trade unions during both planning and implementation (see section 3.1 above).

## 04 Tracking implementation and results.



Transparent and comparable metrics and indicators should be used to measure and track the progress of transition plans, together with workers and their unions. This includes using existing disclosure frameworks, as mentioned above (see section 3.2). It also requires transparency in business relationships throughout the supply chain.

## 05 Communicating how impacts are addressed.



Beyond tracking the implementation and outcomes of just transition policies, companies should disclose these results, including identified risks, prioritisation criteria and actions taken to prevent, address and mitigate them. The benchmark must be shared with workers and their unions in a transparent manner. All policies should be clearly communicated and easily accessible for workers and their organisations, online and on-site. Companies must maintain ongoing and direct engagement with workers, trade unions and other affected rights-holders, especially in cases of potential human rights impacts.

## 06 Enabling remediation.



In consultation with workers, unions and other rights-holders, companies must address and remediate environmental actions when they cause or contribute to negative social impacts such as loss of jobs, loss of livelihood losses and violations of labour rights, including exposure to hazardous working conditions. The full range of appropriate remedies must be considered, going beyond temporary resolution to include forward-looking measures such as reskilling and access to decent work opportunities. At the same time, companies must provide compensation and support during job transitions with social protection as a central priority. Furthermore, remediation mechanisms should be established in consultation with workers, including grievance and complaint systems related to transition plans. Companies must also cooperate with National Contact Points (NCPs) and other legitimate mechanisms when complaints are raised.

## 3.4. Responsible disengagement in the context of the Just Transition

The urgent need to accelerate climate action and shift towards green economies may have significant impacts on jobs and working conditions in supply chains. Studies found that 78% of surveyed MNEs will remove suppliers (ending contractual relationship or divesting) if they hinder their transition plan, for example by refusing to mitigate specific risks, by 2025. 15% of MNEs have already started doing so.[13]

The OECD Key Actions, however, stress that disengagement should only be considered as a last resort, and be accompanied by appropriate remediation measures. They further indicate that "an escalation process towards disengagement can help a company assess whether there is a reasonable prospect of improvement". (p. 37). Concretely, this implies relying on transparent criteria and objective data "in consultation with the relevant business relationships and stakeholders, including workers and their organisations".

The OECD Guidelines underline that "in considering changes in their operations which would have major employment effects, in particular in the case of the closure of an entity involving collective lay-offs or dismissals, [enterprises should] provide reasonable notice of such changes to representatives of the affected workers and their organisations, and, where appropriate, to the relevant governmental authorities, and co-operate with the worker representatives and appropriate governmental authorities so as to mitigate to the maximum extent practicable adverse effects of such changes." (OECD Guidelines, Chapter V, para.6)

Consequently, disengagement can only be considered as "responsible" if the following minimum conditions are met:

### 01 PRIOR CONSULTATION.

No disengagement can be considered responsible without extensive prior consultation of workers and their representatives. Early engagement of trade unions in the transition process – at all levels of the supply chain - is required. Workers' concerns and policy priorities should be recorded - especially from those who will be most exposed – then communicated and discussed with buyers, brands and parent companies as appropriate.

### 02 ASSESS ALTERNATIVES.

While in some cases disengagement might be unavoidable, trade unions should be actively involved in the search for alternative pathways, including the retrofitting of infrastructures, modulation of activities (including following technology transfers) or repurposing of activities, such as through reskilling programmes. Rather than disengaging from existing operations, businesses should first pursue retrofitting and operational improvements aimed at reducing environmental impacts, increasing energy efficiency and improving social and health outcomes.

### 03 COMPENSATION AND REMEDIES.

In cases where disengagement is unavoidable, adequate compensation and remedy measures to mitigate the impact should be negotiated through social dialogue. This includes jointly developing, with support from public authorities, remediation plans that consider the social and economic impacts of disengagement and create new economic and employment opportunities, guaranteeing the right of workers to full and decent jobs, in line with ILO Convention 122. Furthermore, financial remediation measures must be put in place to support affected workers and communities, providing sufficient resources to facilitate transitions such as reskilling and access to social protection.

13 Standard Chartered (2021), Carbon Dated: the net-zero supply chain revolution, https://www.sc.com/en/campaigns/carbon-dated/.

## 3.5. Grievance mechanism: advancing a Just Transition through NCP Complaints

National Contact Points for Responsible Business Conduct (NCPs) are the OECD Guidelines' implementation mechanism and exist in all 52 countries adhering to this instrument.[14] In recent decades, NCPs have been used as an important grievance mechanism for workers and unions seeking remediation in case of labour rights violations.[15] The TUAC Guide offers practical guidance to unions seeking to submit a complaint to an NCP.[16]

As the climate crisis accelerates, a growing number of complaints filed with NCPs are focusing on companies' responsibilities for climate change, pollution or biodiversity loss. To date, there has not yet been any case related to the adverse social impacts of a company's climate policies.

According to the Business and Human Rights Resource Centre's Just Transition Litigation Tracking Tool, the number of just transition cases before domestic and regional courts has however markedly increased in recent years, and unions should consider NCPs as a concrete option in the event of violations of labour rights taking place in the context of the green transition. The OECD Key Action paper provides useful guidance and examples of how a company's conduct may breach the OECD Guidelines and infringe the principles of a just transition.

**FOR MORE INFORMATION ON NCP PROCEDURES AND HOW TO FILE A COMPLAINT, PLEASE CONTACT TUAC@TUAC.ORG.**

14 List of NCPs may be consulted here: National Contact Points for Responsible Business Conduct | OECD

15 See the NCP cases database hosted by the OECD: National Contact Points for Responsible Business Conduct Database | OECD

16 TUAC, 2026, Trade Union Guide

# Annex 1

"Non-exhaustive list of Global Framework Agreements (GFAs) and Collective Bargaining Agreements (CBAs) (chronological order):"

| AGREEMENT | PARTIES | REGION | DESCRIPTION |
|---|---|---|---|
| Joint Environment and Climate Change Agreement (2016) | **Stockport Metropolitan Borough Council** / Stockport LG UNISON | United Kingdom | This agreement sets out a joint approach to a just and fair transition, emphasising cooperation and strong employee input across the various measures and dimensions of the climate transition. |
| Global Framework Agreement on Social Responsibility (2019) | **Siemens** Gamesa / IndustriALL | Global | The agreement on Social Responsibility calls for alignment with the ILO just transition guidelines and commits the signatories to continued social dialogue. |
| INSIEME - Industrial Relations model to support the energy transition process (2020) | **ENI**/ Filctem CGIL, Femca CISL, Uiltec UIL | Italy | The protocol, signed by Italian trade unions, called for a new industrial relations model to support the energy transition process. The MoU emphasizes social dialogue and cooperation as key tools to maximize the benefits of the transition. |
| Industrial Transformation Agreement (2021) | **Korean Metal Industry Employers' Association** / KMWU | South Korea | The agreement covers digital and climate-related transformations and includes measures to ensure job security and decent work, provide training to support adaptation to new technologies, address climate change and promote fair treatment throughout the supply chain. Furthermore, a joint union–management body will be established at the workplace level to create and implement transformation plans. |
| GESTION DES EMPLOIS ET DES PARCOURS PROFESSIONNELS : PREPARER L'AVENIR ET ACCOMPAGNER LA TRANSFORMATION DU GROUPE SANOFI EN FRANCE (2022) | **Sanofi** / CFDT, CFE-CGC, CFTC, CGT | France | Sanofi and trade unions have signed a collective agreement in response to the progression of the ecological transition. The agreement establishes an employment and workforce management framework that includes measures to strengthen internal career mobility, protect jobs at risk from the transition, support skills planning and facilitate the sustained employment of older workers. |
| Global Framework Agreement on social responsibility and sustainable development (2022) | **Solvay** Group / IndustriALL | Global | The chemical multinational and IndustriALL have reinforced their agreement, emphasizing the importance of social dialogue, worker support and the creation of decent new employment in the just transition process. |
| Global Framework Agreement on Fundamental Rights and ENGIE's Social Responsibility (2022) | **ENGIE** / BWI, IndustriALL, PSI, CGT, CFE-CGC, CFDT, FO | Global | In the renewal of the agreement, the company recognizes the need to accelerate the transition to a net-zero economy, accompanied by measures such as social protection, skills development and worker redeployment. Furthermore, it establishes a "World Forum," a body for dialogue between employer and employees, to discuss ENGIE's strategy and to monitor and review the agreement. |

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| Global Framework Agreement (2023) | **Aker** / IndustriALL, Fellesforbundet, Tekna, NITO | Global | Trade unions and the industrial investment company have signed an agreement outlining key just transition measures. These include the creation of new and decent jobs, support for job transitions and the promotion of social dialogue. |
| V Agreement for Employment and Collective Bargaining (2023) | **CEOE**, **CEPYME** / CCOO, UGT | Spain | This National Framework in Spain recognizes the importance of participation and the objective of achieving a just transition. The agreement also includes a section on the ecological transition, outlining its potential impacts on employment and emphasizing the need for collective bargaining to identify and implement appropriate solutions. |
| Future Collective Agreement (2024) | **Bosch Mobility** / IG Metall | Germany | In this agreement, the parties outline a path forward for the green transition by increasing worker involvement in the company's strategic and economic planning and ensuring job security until the end of 2027. |
| Extra-conventional agreement (2024) | **Glencore, Carbones del Cerrejón** / Sintracarbón | Colombia | In addition to signing a collective bargaining agreement, the Colombian coal workers' trade union negotiated an extra-conventional agreement that allows workers, through a bipartite body, to participate directly in the mine closure process. |
| National Collective Agreement (2025) | **Confindustria Energia**/ Filctem CGIL, Femca CISL, ULITEC | Italy | The renewal of the collective agreement for the energy and oil sector reinforces the joint energy transition body and the focus on skills development and worker well-being. |
| Ipotesti Accordo Rinnovo CCNL (2025) | **Federchimica, Farmaindustria** / Filctem CGIL, Femca CISL, Ultec UIL | Italy | The renewal of the Italian National collective labor agreement for the chemical and pharmaceutical industry strengthens worker participation in corporate strategy and enhances skills development in the context of digital and ecological transformation. |
| Global Framework Agreement on Social and Environmental Responsibility (2025) | **EDF Group /** IndustriALL, PSI | Global | The EDF Group commits to a just transition aligned with ILO guidelines, including measures to ensure job quality, fair wages, worker redeployment and the creation of new jobs. |
| Collective Labour Agreement - Joint Committee for the Clothing and Garment Industry (2025) - | **Employers' federation Creamoda**/ABVV-De Algemene Centrale, ACV-Metea, and ACLVB | Belgium | Agreement concluded by the employers federation and the three representative trade unions covered by the Joint Committee for Clothing and Apparel Industry, covering training and employment, including specific employers' contribution to the social guarantee fund for workers. |
| Global Framework Agreement on International Industrial Relations, Corporate Social Responsibility and a Just Transition (2026) | **ENI** / Femca CISL, UILTEC, industriALL | Global | The renewed agreement recognizes social dialogue as a crucial instrument for ENI's energy transition process and emphasizes a "people-centered approach" to the just transition. |

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