***Non-State based mechanisms***

1. What remediation responsibilities should investors have? Should these responsibilities vary depending on the nature of the responsibility e.g. cause, contribute to, or be directly linked to the adverse human rights impact? Should it vary depending on the sector invested or the type of investment activity?

A// The investors should respond only for the acts that affects human rights related to the omissions and weaknesses during the due diligence phase, because they must be assured that the companies follow the same investor´s compliance policy and ethics program in order to avoid reputational damages.

It involves establishing a set of ethical and sustainable practices in each phase of the commercial relationship. This includes working with companies who share the same ethical and environmental values, establishing clear standards for companies behavior and constantly monitoring their compliance, and looking for ways to reduce the environmental impact of the supply chain.

The investor does not have to assume the same responsibility as a company, but they must react in order to the company stops and remediates the casualty. [[1]](#footnote-1)

1. What measures and mechanisms, including grievance mechanisms, should be provided at the investment-level that enable individuals or communities affected by the business in which the investor has invested (e.g. the portfolio company) to report adverse human rights impacts to the investor and seek effective remedy for human rights and environmental abuses? How effective are these in providing remedies to the victims? Please provide examples of business or industry association actions in this area.

A// In my opinion, I consider that the best way to allow people to lodge a complaint to the investor, is that investor creates a grievance system only for the investment like a webpage or an email and this shall be posted in a public space.

This is not binding but allows to the market know the complaint and make decisions about this situation.

In Palm oil sector, when a complainant lodges a complaint in the RSPO portal, this is posted in a webpage named case tracker and all the stakeholders can see it. Based on that, they can make decisions to buy or not this product.[[2]](#footnote-2)

**Good practices**

1. Please provide examples of any good practices, tools, guidance, policies, etc., regarding the integration of the responsibility to respect human rights by investors, including examples of investors actively preventing or mitigating (including by using leverage or undertaking a responsible exit) any adverse human rights and environment impacts of the businesses in which they invest.

A// I know the equator principles and in Palm Oil the RSPO standards.

1. Are there any specific recommendations to States, businesses (including investors), civil society, UN bodies and National Human Rights Institutions that would assist in ensuring that investors act compatibly with the UNGPs?

A// The biggest recommendation is that investors must be held accountable for failing to perform due diligence processes and failing to detect foreseeable human rights risks.

The other recommendation is that companies are obliged to follow compliance policies and investors' codes of ethics.

Finally, the fact that the company is violating human rights shall be a cause for termination or suspension of the investment.

1. See on: <https://mneguidelines.oecd.org/los-inversionistas-institucionales-y-la-conducta-empresarial-responsable.pdf> [↑](#footnote-ref-1)
2. See on: <https://rspo.my.site.com/Complaint/s/casetracker> [↑](#footnote-ref-2)