

# Rules of Procedure of the Austrian National Contact Point (Austrian NCP)

for Responsible Business Conduct

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# 1 Introduction

When the updated OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereinafter called: Guidelines) were adopted on 8 June 2023, the Adherents to the OECD Declaration on International Investment and Multinational Enterprises in the OECD Council renewed their commitment to set up National Contact Points. The National Contact Points are vested with a twofold mandate:

- a) Promote of the OECD Guidelines and their effective implementation
- b) Act as grievance mechanism by contributing to the resolution of issues that arise in relation to the implementation of the Guidelines

# 2 Organisation

Austria's National Contact Point (German acronym: öNKP, for ease of understanding henceforth called Austrian NCP) is based within the Federal Ministry of Labour and Economy (Bundesministerium für Arbeit und Wirtschaft – BMAW). The organisational unit responsible for the Austrian NCP is V/6a – Austrian National Contact Point for the OECD Guidelines for Multinational Enterprises. A Steering Committee (Lenkungsausschuss – LAUS) has been established to assist the Austrian NCP. The composition, remit and activities of the Steering Committee are set forth in its Rules of Procedure, which are available at the Austrian NCP. Unit V/6a acts as the office of the Steering Committee. The Head of the Austrian NCP takes part in the meetings of the Steering Committee in an advisory capacity, has no voting right and is responsible for taking the minutes.

## 3 Core effectiveness criteria

The Austrian NCP operates in a manner that is consistent with the core effectiveness criteria for National Contact Points.

#### 3.1 Visibility

The Austrian NCP is sufficiently visible to stakeholders and relevant government agencies. The Austrian NCP will strive to enhance its visibility, for example through information materials and events. Information on the OECD Guidelines, the Austrian NCP or the grievance procedure is available on the Austrian NCP's website <a href="https://www.oecd-leitsaetze.at">www.oecd-leitsaetze.at</a>.

#### 3.2 Accessibility

The Austrian NCP is available for enquiries from stakeholders and relevant government agencies. Enquiries may be made by e-mail, post or telephone. The Guidelines and information about them as well as information about the Austrian NCP and the grievance procedure will be published in German and English on the Austrian NCP's website. The submission form for grievance procedures is available in German, English and French. The requirements and criteria for submitting complaints are explained in a specific Guidance on Grievance Procedures.

#### 3.3 Transparency

The Austrian NCP conducts its activities in a transparent manner subject to applicable law, thus contributing to confidence building on the part of stakeholders, parties to specific instances and the general public. Every year, the Austrian NCP will report on its activities to the OECD and publish these annual reports on its website. Transparency is the general principle of any grievance procedure as far as the level of confidentiality so permits, such confidentiality forming the required basis of trust for constructive dialogue. This will ensure the necessary protection of legitimate interests of the parties involved (consistent with the Procedures in Part II of the OECD Guidelines).

#### 3.4 Accountability

At least twice a year, the Austrian NCP will inform its Steering Committee about significant developments in its activities, including specific instances. In addition, the Austrian NCP will forward annual reports on its activities to the OECD Investment Committee, with the Steering Committee being given the opportunity to engage. The Austrian NCP will be subject to periodic OECD peer reviews. At national level, parliamentary questions on the activities of the Austrian NCP may be submitted to the competent federal minister.

#### 3.5 Impartiality and equity

The Austrian NCP seeks to maintain the confidence of stakeholders, parties to specific instances and the general public. Moreover, the Austrian NCP will seek to prevent conflicts of interests. It acts in an impartial manner and ensures fair and equitable terms vis-à-vis the parties involved in a grievance procedure in relation to specific instances. The Austrian NCP will make available on its website its own Guidance on Grievance Procedures within the context of specific instances. In order to ensure a comparable level of information, the parties to a specific instance will be given reasonable access to all information relating to this instance, unless legitimate interests of the parties involved or mandatory rules (e.g. data protection) preclude such access. As far as possible, the Austrian NCP will be available for questions, explanations and other forms of assistance at every stage of the process. Where required, the Austrian NCP may organise deadlines flexibly to account for any differences in parties' capacities and resources.

#### 3.6 Predictability

The Austrian NCP provides clear and publicly available information on its role and activities. Particularly, it will inform about the grievance procedures it follows, the criteria for accepting specific instances, the stages of a grievance procedure (including indicative timeframes), the voluntary and non-binding nature of the process, expectations concerning good faith engagement by the parties, confidentiality and transparency, the provision of good offices, the possible outcomes of the process and the role adopted by the Austrian NCP in a grievance procedure. The Austrian NCP will regularly inform parties to specific instances of the progress of the case to provide them with a predictable and clear picture of the grievance procedure.

#### 3.7 Compatibility with the OECD Guidelines

The Austrian NCP will always operate in a way that is compatible with the Guidelines and be guided by their principles and standards. In respect of grievance proceedings, it will specifically follow the Procedures set out in Part II of the Guidelines. During the proceedings, the Austrian NCP will assist the parties with its expertise on the Guidelines, thus fostering an agreement that is compatible with these Guidelines.

### 4 Promotion and information

The Austrian NCP will ensure promoting the Guidelines and the related due diligence guidance documents of the OECD as widely as possible and raises awareness of their implementation. More specifically, the Austrian NCP will seek to encourage enterprises to act in accordance with the OECD Guidelines. To this end, the NCP will cooperate with stakeholders, social partners, civil society organisations and relevant government agencies.

The Austrian NCP will provide information materials, organise events and participate, where possible, in relevant events organised by stakeholders, the OECD or other National Contact Points.

The Austrian NCP operates the website <a href="www.oecd-leitsaetze.at">www.oecd-leitsaetze.at</a>, which mainly serves to publicise the Guidelines and provide general information on the Austrian NCP and its activities. Information on this website will include in particular:

- a) OECD Guidelines
- b) Related due diligence guidance documents of the OECD
- c) Complaint submission forms
- d) Guidance on Grievance Procedures of the Austrian NCP
- e) Statements of the Austrian NCP in specific instances (in particular initial assessment and final statement)
- f) Annual reports of the Austrian NCP to the OECD Investment Committee
- g) Information on tasks, composition and work of the Austrian NCP's Steering Committee

In addition, the Austrian NCP will respond to enquiries about the Guidelines or the OECD's due diligence guidance. In particular, it will be available to the stakeholders concerned, other National Contact Points and governments of non-Adherents regarding information and enquiries relating to the Guidelines.

# 5 Specific Instances

#### 5.1 Grievance mechanism

Within its twofold mandate, the Austrian NCP will act as a non-judicial grievance mechanism and offer a protected discussion forum for the resolution of issues relating to compliance with the Guidelines. The grievance procedure aims to reach a consensus-based agreement between the parties on issues raised that is compatible with the Guidelines and thus promotes the effectiveness of the Guidelines. The Austrian NCP assists the parties both with its expertise on the Guidelines and through mediating a constructive dialogue.

#### 5.2 Nature of the grievance procedure

Grievance already concluded, which concern the issue raised will thus not constitute a compelling reason for the Austrian NCP to refuse the complaint. Nor will the complainant's option of instituting judicial or administrative proceedings constitute a reason to refuse the complaint. Rather, the NCP will examine on a case-by-case basis whether conducting proceedings may make a positive contribution to resolving the issues raised, and whether no adverse impacts on other proceedings are to be expected.

The Austrian NCP is not a quasi-judicial body, and its specific instances are no formal legal cases. The Austrian NCP is not authorised to issue orders and execute coercive measures. Nor are National Contact Points tasked with checking whether an enterprise is complying with binding rules and laws.

#### 5.3 Submitting a complaint

Any person or organisation may submit a complaint with the competent National Contact Point on their own behalf or as legitimate representatives regarding an alleged contravention of the Guidelines by a multinational enterprise.

#### 5.4 Costs of the grievance procedure

The parties will bear their own costs incurred in the grievance procedure. Bringing a complaint before the Austrian NCP is free of charge.

#### 5.5 Initiating the grievance procedure

The grievance procedure will be initiated by submitting a complaint to the Austrian NCP. Submission is in writing by e-mail and, where possible, using the form provided for this purpose, which is available in German, English and French on the website of the Austrian NCP. The complaint may also be filed in writing by post. It should be accompanied by documents and papers that are suited to substantiate the issues raised.

Where possible, the Austrian NCP will confirm receipt of the complaint to the complainant within ten working days of receipt.

#### 5.6 Completeness of the complaint

The Austrian NCP will first check completeness of the complaint and may request additional information where necessary. The complaint is complete if the following information is included:

- a) Name, address and, where appropriate, e-mail and telephone number of the complainant.
  - Complaints may not be submitted anonymously to the Austrian NCP. The complainant must be named and provide appropriate contact details.
- b) Name, address and, where appropriate, e-mail and telephone number of the respondent (enterprise in question).
- c) Identification of the provision of the Guidelines the violation of which is alleged.
- d) Presentation of the facts from which the alleged violation of the Guidelines is deemed to arise.
  - The alleged violation must fall within the scope of the OECD Guidelines and be specified in the complaint.
- e) If the respondent's alleged responsibility relates to the supply chain, the relationship of the respondent with the company that is alleged to have violated the indicated provisions of the Guidelines must be explained.
- f) The complainant must explain its legitimate interest in the matter and submit the complaint in good faith.

#### 5.7 International competence

#### 5.7.1 Competence

The Austrian NCP is the competent National Contact Point for the grievance procedure:

- a) whenever the alleged violation of the OECD Guidelines took place in Austria
- b) whenever the state where the alleged violation of the OECD Guidelines took place has not established a National Contact Point and the enterprise concerned has its headquarters in Austria
- c) whenever another relevant interest warrants handling of the complaint by the Austrian NCP
- d) whenever handling of the complaint cannot be assured otherwise

Whenever a complaint is submitted where the Austrian NCP considers itself not to be the competent body, it will inform the complainant accordingly.

#### 5.7.2 Several National Contact Points concerned

If a complaint, based on the issues raised, concerns the National Contact Point of another country or the National Contact Points of several other countries, the Austrian NCP will coordinate in good faith with this or these NCP(s) with the goal of designating the lead and supporting NCPs.

Supporting activities include obtaining, checking or translating documents or liaising with relevant authorities, etc. Where required, this may also include coordination arrangements among the National Contact Points concerned. The parties to the proceedings will be kept informed about such coordination arrangements, and they will be consulted prior to decisions to transfer the case to a different NCP.

Initial coordination arrangements to identify the responsibilities of several National Contact Points concerned should be completed, whenever possible, within two months of submission of the complaint.

#### 5.8 Initial assessment

#### 5.8.1 Comment of the respondent to the complaint

Having clarified completeness of and competence for the complaint, the Austrian NCP will communicate the complaint to the respondent, explain the next phases of the proceedings and ask the respondent to provide a comment within four weeks. In addition, the respondent will be informed that its comment will be forwarded to the complainant. If the Austrian NCP deems it necessary for its initial assessment, it may request further comments from the parties.

#### 5.8.2 Explanation of the Austrian NCP's case-handling framework

The Austrian NCP offers all the parties individual meetings or discussions to provide details on the grievance procedure and explain its case-handling framework. The Austrian NCP seeks to engage the respondent in the grievance procedure.

#### 5.8.3 Criteria for accepting a specific instance

Based on the complaint and the comments received, the Austrian NCP will make an initial assessment of whether the issues raised in the complaint warrant further examination of the specific instance. The respondent's willingness to engage in the proceedings is irrelevant for the decision to accept a specific instance. Initial assessment is based on the following criteria:

- a) The complainant has a legitimate interest in the matter. Interest in the matter must be clearly demonstrated. It is possible to submit a complaint by proxy if lawful power of representation is demonstrated.
- b) The complaint is material and sufficiently substantiated. A complaint is material when it is relevant to the implementation of the OECD Guidelines, and when it alleges violation of one or more recommendations of the Guidelines. A complaint is sufficiently substantiated when the allegations appear credible based on the parties' submissions. There must be a plausible link between the enterprise's activities and the issues raised. However, this does not involve nay burden of proof.
- c) The respondent is an **enterprise**. The Guidelines apply to all enterprises irrespective of ownership, corporate structure or sector.
- d) The enterprise is **multinational**. The term 'multinational' is interpreted broadly within the meaning of the Guidelines. The factors to be taken into account include corporate structure and business activities of the enterprise as well as its business form and purpose.

- e) The enterprise operates in or from a territory of an Adherent to the OECD Guidelines. This criterion is independent of the state of incorporation or headquarters of the enterprise.
- f) There is a link between the activities of the enterprise or its business partners and the alleged violation of the Guidelines. There have been adverse impacts in violation of the Guidelines that are allegedly either caused or contributed to by the enterprise, or are directly linked to their operations, products or services by business relationships.

In addition, the Austrian NCP will assess the relevance of the issue raised in the complaint. In so doing, the NCP will take into account the extent to which it could contribute to the resolution of the issue and whether its handling of the specific instance in question could contribute to the effectiveness of the Guidelines.

#### 5.8.4 Acceptance or refusal to accept a specific instance

If the issues raised warrant further examination, and if the required criteria are met, the Austrian NCP will accept the instance based on its initial assessment. If one or several criteria are not met, further examination will not be appropriate, and the Austrian NCP will refuse to accept this specific instance.

The Austrian NCP will conclude initial assessment, where possible, within three months of receipt of the complaint and will state adequate reasons for its decision. Requests for additional information by the Austrian NCP will interrupt this period until submission of the improved complaint.

The Austrian NCP's decision to accept a specific instance does not mean that it has issued a statement, apportioned blame within the meaning of the Guidelines or taken any decision in the matter. Rather, it means that the issue raised warrants further examination of its contents in relation to the OECD Guidelines. Initial assessment is based on the above criteria, which must be credible in the eyes of the Austrian NCP. Furthermore, initial assessment is based on the parties' submissions.

#### 5.8.5 Initial assessment published in writing

The Austrian NCP will summarise in writing the issues raised and the respondent's comments, including in any case the identity of the parties involved (unless there are reasonable grounds not to do so), the grounds for complaint, the pertaining chapters of the OECD Guidelines and their relevance as well as the reasons for accepting or refusing to accept the specific instance for further examination. The Austrian NCP will communicate a draft of this statement to the parties, giving them the opportunity to

comment, whereupon it will decide at its discretion the extent to which any comments will be considered in the finalised initial assessment. The finalised written result of the initial assessment will be communicated to the parties, published on the website of the Austrian NCP and forwarded to the OECD Secretariat for inclusion in the OECD's public database.

#### 5.9 Good offices of the Austrian NCP

If the Austrian NCP finds that the issues raised warrant further examination and has accepted the specific instance, a mediation process will be initiated, wherein it offers the parties its good offices and seeks to mediate between the parties, look into the allegations and resolve the issue by agreement of the parties involved. This is intended to foster compliance with the OECD Guidelines and develop a sustainable solution within the meaning of the Guidelines. The Austrian NCP offers a platform for dialogue and mediation.

The mediation proceedings are based on written comments and discussions between the parties. Where required, the NCP may seek information from competent authorities, experts and other informed persons. In relation to other Adherents, the Austrian NCP may consult other National Contact Points. In the event of questions regarding the interpretation of the Guidelines, the Austrian NCP may seek guidance from the OECD Secretariat, the OECD Working Party on Responsible Business Conduct or the OECD Investment Committee. The Steering Committee of the Austrian NCP can provide advice.

The parties may also reject the Austrian NCP's good offices. The Austrian NCP may discontinue the grievance procedure at any time if one or several parties show(s) insufficient readiness to meaningfully engage in the mediation proceedings.

#### **5.9.1** Course of the good offices

At the outset, the Austrian NCP will discuss with the parties their expectations of the good offices as well as the objectives and specific organisation of this process. At the beginning of the mediation process, both parties will be given the opportunity to present their view on the issue and its merits. The Austrian NCP is responsible for managing the proceedings, assists in the dialogue and may propose solutions. If a party rejects the NCP's attempts at mediation, or if no agreement can be reached, the mediation process will by discontinued by the Austrian NCP and concluded with a final statement.

The Austrian NCP may choose to carry out mediation itself or, with the agreement of all parties, engage an external mediator to do so, the important aspect being that this person

is impartial and that there is no conflict of interests. The results of the dialogue will be recorded in writing by the Austrian NCP.

The Austrian NCP creates the organisational conditions for talks conducted in an efficient and protected manner. Mediation meetings are generally held at the headquarters of the Austrian NCP, Federal Ministry of Labour and Economy, Stubenring 1, 1010 Vienna, with the parties being present. If it is conducive to mediation, a meeting may also be held at another location or virtually in agreement with the parties and with the consent of the Austrian NCP. The language of the procedure will be specified in consultation with the parties in advance — as a rule, it is German, but occasionally the parties may also agree on English.

#### 5.9.2 Confidential information

Before the beginning of mediation process, the Austrian NCP may draw up a procedural agreement (Terms of Reference) in compliance with the Guidelines and the present Rules of Procedure to facilitate a constructive dialogue between the parties, specify the transparency and confidentiality requirements as well as the scope and course of discussions and create a basis of trust. The Terms of Reference may cover procedural and logistical aspects as well as other questions that the parties or the Austrian NCP wish to define.

The mediation process is guided by the principle of transparency. The parties are given access to all sources of information relevant to the issue or procedure. For reasons of procedural transparency, all and any data and information relating to the proceedings and provided by one party to the Austrian NCP will be forwarded by the NCP to the other parties unless there are legitimate interests (such as protection of life and limb, of business and trade secrets) that preclude disclosure. If information is not to be forwarded by the Austrian NCP due to legitimate interests, the submitting party will notify the NCP in writing in a timely manner, while demonstrating clearly the reasons for such non-disclosure. Partial redaction of documents may be considered.

This applies in particular to cases where the publication of information entails a risk of reprisals against individuals involved in the proceedings, against related persons or the Austrian NCP. The Austrian NCP will take the necessary measures to protect confidential information, such measures being upheld also after conclusion of the grievance procedure. The parties, the Austrian NCP or other external individuals consulted will not share with third parties or the general public any information only known to them as a result of the proceedings unless the parties and the Austrian NCP agree to its disclosure, such information is already in the public domain or not disclosing would be contrary to the provisions of mandatory law.

In any case, the components of the initial assessment and the final statement are shared with the public, meaning that the parties may communicate publicly on the existence of the specific instance and the reason for the complaint. In some cases, even the identity of the parties involved is not disclosed, for instance when its disclosure could be of disadvantage to one or both parties. Disclosure of any other information will be agreed by the parties. This is without prejudice to mandatory rules on disclosure or data protection, which must be observed.

#### 5.10 Conclusion of the grievance procedure

Any complaint addressed to the Austrian NCP will be concluded with a final statement published on the Austrian NCP's website. This document will be forwarded to the OECD Secretariat for inclusion in its public database. The Austrian NCP will also draft a final statement in cases where an external person has been engaged for mediation. A grievance procedure before the Austrian NCP may have the following results:

- a) The parties decline the offer of good offices.
- b) The parties reach an agreement.
- c) The proceedings are discontinued.

#### 5.10.1 Good offices declined by the parties

If one of the parties declines the good offices of the Austrian NCP, the grievance procedure will be terminated. The Austrian NCP will draft its final statement which will at a minimum describe the issues raised, the parties' identity and respective positions as appropriate, the steps taken by the Austrian NCP in considering the complaint, the parties' readiness to engage in the proceedings and the reasons for discontinuing them. It will also explain the relevance of the grievance procedure for the effective implementation of the OECD Guidelines.

#### 5.10.2 Agreement

If the parties reach an agreement on the issues raised, the Austrian NCP will draft a joint final statement with the parties. The statement will at a minimum describe the issues raised, the parties' identity and respective positions as appropriate, the steps taken by the NCP to resolve the dispute, the parties' readiness to engage in the proceedings, the date when agreement was reached and recommendations of the Austrian NCP where appropriate. In addition, the final statement will explain the importance of the grievance procedure for the effective implementation of the OECD Guidelines. The parties should

also address in their agreement how and to what extent the content of the agreement is to be made publicly available, and which form any follow-up is to take.

#### 5.10.3 Discontinuation of the procedure

If the parties are unable to reach agreement on key points of the complaint, the Austrian NCP may discontinue the proceedings. Its final statement will at a minimum inform about the issues raised, the parties' identity and respective positions as appropriate, the steps taken by the NCP to resolve the dispute, the parties' readiness to engage in the proceedings and the reasons for discontinuing them. In addition, the final statement will explain the importance of the grievance procedure for the effective implementation of the OECD Guidelines. Despite the lack of agreement, the Austrian NCP may include recommendations in its final statement.

#### 5.10.4 Final statement

Where possible, the Austrian NCP will draft a final written statement within three months of conclusion of the proceedings.

Before finalising the statement, the Austrian NCP will provide an opportunity for the parties to comment on its draft statement. It is within the Austrian NCP's discretion to decide whether and to what extent it will change the draft statement in response to comments from the parties. Where the parties are unable to agree on the wording of the final written statement, the Austrian NCP will take a final decision.

#### 5.11 Timeframe for the grievance procedure

The Austrian NCP will endeavour to conclude the procedure within 12 months of submission of a complaint (14 months if coordination to determine a lead NCP is needed).

There may be external factors that delay the proceedings. Such situations include, but are not limited to, situations when the issues arise in a non-Adherent, when the specific instance involves multiple enterprises, multiple submitters or multiple NCPs, or when translations are necessary, or when the Austrian NCP needs to consult with its Steering Committee, the OECD or public authorities, etc. Therefore, the timeframes indicated in this Guidance are to provide orientation rather than rigid deadlines. The NCP will keep the parties informed of any deviations from the intended timeframes.

#### 5.12 Follow up

Once the grievance procedure was closed, the Austrian NCP, in consultation with the parties, may provide a follow-up assisted by the Austrian NCP. Any intended follow-up will also be referred to in the final statement, including deadlines to do so. The Austrian NCP may publish a follow-up statement after conducting the follow-up.

#### 5.13 Withdrawal of the complaint

If the complainant withdraws the complaint before the proceedings are concluded, the Austrian NCP will close the grievance procedure. The Austrian NCP will inform the respondent and the OECD Secretariat of such withdrawal.

#### 5.14 Feedback of the parties

After conclusion of the proceedings, the Austrian NCP will ask the parties to provide feedback on its handling of the grievance procedure.

#### **5.15** Protection against reprisals

Threatening or taking reprisals against any of the parties involved including the Austrian NCP is unacceptable to the Austrian NCP. Reprisals may include threats to harm physically or psychologically the individual concerned, their family or other relations or organisations or actually do so; threats to carry out unfair dismissals, benefit cuts or legal action or actually do so.

Throughout the entire grievance procedure, the Austrian NCP will take all reasonable and appropriate measures to counteract the risk of reprisals. If the Austrian NCP becomes aware of actual or imminent reprisals, it will assist the individuals concerned as far as possible. To this end, the NCP may contact the competent authorities, there possible in consultation with the individuals concerned. Measures taken by the Austrian NCP may include, for example, keeping the identity of the person at risk confidential, suggesting that the person at risk be represented by a trusted third party, documenting attempted reprisals, reaching out to relevant authorities or embassies etc.

# 6 Support for government efforts

The Austrian NCP will support the Austrian federal government in the development, coherence and implementation of policies and programmes that promote responsible business conduct, where their capacities and resources so permit and in agreement with the relevant government agencies. In doing so, the Austrian NCP will take care that these policies and programmes are aligned with the OECD Guidelines. Furthermore, the Austrian NCP will strive to maintain the position of the OECD Guidelines and other instruments deriving from them (such as the OECD due diligence guidance) as recognised international standards.

# 7 Involvement of the Steering Committee

The Austrian NCP will inform its Steering Committee immediately about key steps taken in handling the complaints received. This relates in particular to:

- a) Receipt of a complaint submitted in relation to a specific instance
- b) Request for information or documents to supplement the complaint submitted in relation to a specific instance
- c) Refusal by the Austrian NCP to accept a complaint in relation to a specific instance on the grounds of not being the competent body
- d) Result of the initial assessment of a specific instance (acceptance or refusal to accept)
- e) Beginning of further examination of the specific instance
- f) Interruption of resumption of a grievance procedure
- g) Assignment of an external mediator
- h) Consultation with other National Contact Points during grievance procedures
- i) Seeking guidance from the OECD Working Party on Responsible Business Conduct or the OECD Investment Committee during grievance procedures
- j) Result of a grievance procedure

The Austrian NCP may consult the Steering Committee in all matters relating to the implementation and promotion of the OECD Guidelines.

# 8 Cooperation with other National Contact Points

The Austrian NCP will seek cooperation with other National Contact Points. Cooperation is particularly recommended:

- a) For organising joint projects and events
- b) For responding to enquiries from other National Contact Points
- c) For participating in peer reviews
- d) For exchanging experiences (peer learning)
- e) For clarifying, where appropriate, the competence and responsibilities in handling grievance procedures in relation to specific instances
- f) For handling grievance procedures in relation to specific instances where several National Contact Points are concerned

# 9 Reporting

As part of its activities, the Austrian NCP has the following reporting obligations:

- a) Annual reports to the OECD Investment Committee
- b) Reporting at the annual meetings of the network of the OECD National Contact Points
- c) Ad hoc reports to the OECD Secretariat relating to specific instances (in particular on submission of complaint, initial assessment, outcome of a grievance procedure, final statement)
- d) Ad hoc reports to the OECD Secretariat relating to any organisational changes within the Austrian NCP

## 10 Peer Reviews

The Austrian NCP will periodically participate in the mandatory peer reviews organised by the OECD Secretariat under the oversight of the OECD Working Party on Responsible Business Conduct. Peer reviews serve to evaluate the strengths and weaknesses of a National Contact Point (in particular with regard to the core effectiveness criteria).

# 11 Data Protection

The Austrian NCP will process personal data in accordance with the EU General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (Datenschutzgesetz - DSG).

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