

# The **SheDil** Index Report, 2nd ed.

What do Norwegian companies do to promote and respect women's human rights?



An assessment of selected Norwegian companies' public policies, commitments, and reporting on the gender dimension of human rights due diligence.  
2nd Edition, January 2024.



# Executive summary

Human Rights Due Diligence (HRDD) is a tool for businesses to manage risks of adverse human rights impacts from their activities and is increasingly being enshrined in law. However, human rights violations are not gender-neutral, and the HRDD process must be gender mainstreamed to identify and respond to violations that affect women and girls in particular. The SheDil Index assesses the gender responsiveness of a selection of Norwegian companies in light of recent legislative developments.

In 2022, the Norwegian Parliament passed the Transparency Act, requiring companies of a certain size to conduct human rights due diligence, with 30 June 2023 as the first reporting deadline. Another key legislative development, the EU Corporate Sustainability Due Diligence Directive (CSDDD), passed a major milestone towards adoption on 14 December 2023. Both in Norway and elsewhere, HRDD is becoming mandatory, which requires increased attention to gender-specific risks.

This second edition of the SheDil Index, the first since Transparency Act entered into force, finds that although the companies' reporting has improved, there is still considerable room for further improvements to fully incorporate the gender dimension of HRDD. This is particularly the case in the companies' supply chains and for impacts on and engagement with external stakeholders.

The SheDil Index assesses gender-responsive HRDD processes based on publicly available information, inspired by the United Nations Guiding Principles on Business and Human Rights' (UNGP) recommendation to companies to report and inform publicly about human rights risks related to their business operations and how these are being addressed. The SheDil Index looks at three spheres of impact, namely a company's own operations; suppliers, subcontractors, agents, recruiters, and other intermediaries; and other stakeholders, including local communities. The study uses a five-level traffic lights scoring system ranging from poor performance on gender-responsive human rights due diligence (red) to a performance that meets or exceeds the expectations of international law and policy and/or NGOs (green). The report applies the SheDil Index to 25 Norwegian companies in five sectors: (1) construction, (2) food/agriculture, (3) extractives/energy, (4) garment/textiles, and (5) marine. All companies were part of the first SheDil Index, making it possible to assess changes over the last 12-18 months. The individual findings have been shared with the assessed companies offering them the possibility to respond.

## Main findings

While no relevant information was found for around half of the indicators across all the assessed companies in the

first SheDil Index published in 2022, this is reduced to 38 % in the present edition. Still, the fact that no relevant public information was found for one of three indicators, is a call for action.

The study found that there is improved inclusion of gender-specific topics in updated Code of Conducts (CoC) and other policies, as well as companies engaging in joint initiatives to promote women's participation and/or protect women's rights. All the assessed companies have at least some kind of policy on gender equality and at a minimum a general due diligence process or materiality analysis also including the supply chain. Only one company has publicly expressed support to human rights defenders, and only two companies report publicly on the share of women workers in their supply chain.

Food/agriculture and extractives/energy are the two sectors with most light-green and green scores, while the construction and garment/textile sectors have most reds. (See tables 7-9 for more detail). All sectors have the highest scores in their own operations, with the garment/textiles' supply chain scoring almost at the same level as for its own operations. At the individual level, 22 of the 25 assessed companies perform best within their own operations, while three companies, two from the garment sector and one agricultural, receive a higher score with respect to their supply chain.

Regarding their own operations, all companies have at least some kind of policies for human rights, or a CoC, that as a minimum includes the principle of non-discrimination based on gender. There has been a notable improvement in gender-specific targets and reporting, in particular for the food/agriculture and marine companies. As for supply chain operations, all companies have some form of human rights and/or environment, social,

and governance due diligence in the supply chain, but only for less than 1/3 of the companies did these processes explicitly address gender-related risks. Similarly, all companies but one had a CoC for suppliers that includes equal opportunities and/or non-discrimination, but only 1/3 mention additional risks for women workers. Furthermore, only two companies collect and publish gender-disaggregated information about the workforce in the supply chain, while eight companies are part of a gender-related initiative or joint effort to promote and/or protect women workers rights.

As for relations with external stakeholders, around half of the companies conduct a regular materiality analysis without this being gender specific. Only two companies were found to explicitly address gender risks in their due diligence efforts for external stakeholders. Furthermore, 2/3 of the companies have some form of regular engagement with external stakeholders like local communities, NGOs or other organisations, without the gender lens being explicitly reflected in plans, approaches or reports. Five of the companies have modified policies with a clear gender dimension, while another five at a more general

level. No company is found to have engaged in gender-responsive remediation processes, but 2/3 of the companies have an externally available whistle-blowing mechanism without an explicit gender approach.

### Conclusions

Based on these findings, it is evident that there are improvements in some areas from the first SheDil Index. A few companies have taken significant steps, the majority of the companies have made minor progress while some companies are not found to have moved much. Applying a gender responsive HRDD would better enable companies to meet their responsibility to protect human rights under the UNGP, help meet SDGs 5 and 8 by 2030 and to comply with the Norwegian Transparency Act as well as the EU CSDDD. FOKUS - Forum for Women and Development offers a digital tool – SheDil – to help companies do so.



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## Abbreviations

<b>FOKUS</b>	Forum for Women and Development
<b>CoC</b>	Code of Conduct
<b>CSDDD</b>	Corporate Sustainability Due Diligence Directive
<b>EU</b>	European Union
<b>GBV</b>	Gender-Based Violence
<b>ILO</b>	International Labour Organisation
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>PC</b>	Worker Participation Committee
<b>SDG</b>	Sustainable Development Goals
<b>SHCC</b>	Sexual Harassment Complaint Committee
<b>UN</b>	United Nations
<b>UNGP</b>	United Nations Guiding Principles on Business and Human Rights
<b>WBA</b>	World Benchmarking Alliance
<b>WHRD</b>	Women's Human Rights Defenders

# Introduction

SheDil<sup>1</sup> is a digital tool for gender-responsive Human Rights Due Diligence. The tool is developed by FOK-US - Forum for Women and Development primarily for companies, but is also highly relevant for NGOs or other actors working to identify risks and measures in safeguarding women's rights as workers, in a company's own operations or supply chain, and women as part of local communities that might be affected by the business operations. The tool has tailored guidance for the agricultural, extractive, and garment- and footwear sectors, chosen due to their well-known risks for women's human rights, but is fully applicable to other business sectors as well. Launched in 2020, the tool is based on the Organisation for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights (UNGP), and is designed to support companies to deliver on the gender dimension of the Sustainable Development Goals (SDGs), particularly SDG 5 (gender equality) and SDG 8 (decent work and economic growth). The present report is the second edition of the SheDil Index, applying the SheDil framework for assessing the gender-responsive human rights due diligence processes of 25 Norwegian companies in five sectors.<sup>2</sup>

The report proceeds with a brief overview of the relevant legal and political developments in Norway and abroad, an explanation of the selection of companies and sectors followed by an introduction to the SheDil Index, its indicators and the three spheres of impact. The report then presents the qualitative findings, including (1)

the distribution of scores, across all indicators and companies; (2) the total scores by sector; (3) the distribution of scores by business relationship; and (4) sector scores by sphere of impact. All companies part of this report were also assessed in the 2022 SheDil Index, thus an analysis of changes from last year is integrated throughout. Finally, the more specific and qualitative sector-level findings are presented, and the overall key findings are summarised.

## Legal and political context

The human rights due diligence process was introduced by the UNGP in 2011 to bolster the corporate responsibility to respect human rights. The duty to carry out human rights due diligence is included in the OECD Guidelines for Multinational Enterprises (OECD Guidelines), and is the backbone of OECD's Due Diligence Guidance for Responsible Business Conduct.<sup>3</sup> The steps of this process, shown in figure 1 on page 6, are commit, identify, prevent and mitigate, track, and communicate. This process should be ongoing, as human rights risk may change over time.

The key findings of The World Benchmark Alliance's (WBA) 2023 Gender Benchmark<sup>4</sup> states that performance on gender equality is dismal; in most companies, women are underrepresented and their concerns unheard. The majority (66%) of the 1,006 global companies assessed have public policies prohibiting violence and harassment in the workplace – and have some kind of grievance mechanism in place – but only 4% disclose details on their remediation processes. Although suppliers are expected to respect human rights and promote gender equality, only 27% of the apparel companies are considered to have responsible purchasing practices in place that enables suppliers to meet these expectations, according to the WBA report.<sup>3</sup> These failures are even more serious for women's human rights, as women and girls are more likely to face discrimination and inequality. For example, according to the 2022 report by the International Labour Organisation (ILO) the Walk Free Foundation and the International Organisation on Migration, an estimated 11.8 million women and girls are victims of forced labour.<sup>5</sup>

**«The importance of meaningful stakeholder dialogue as part of the HR DD has been further accentuated in the 2023 update of OECD Guidelines for responsible business conduct.»**

Allan Jorgensen, Head of Responsible Business Conduct Centre, OECD, December 2023

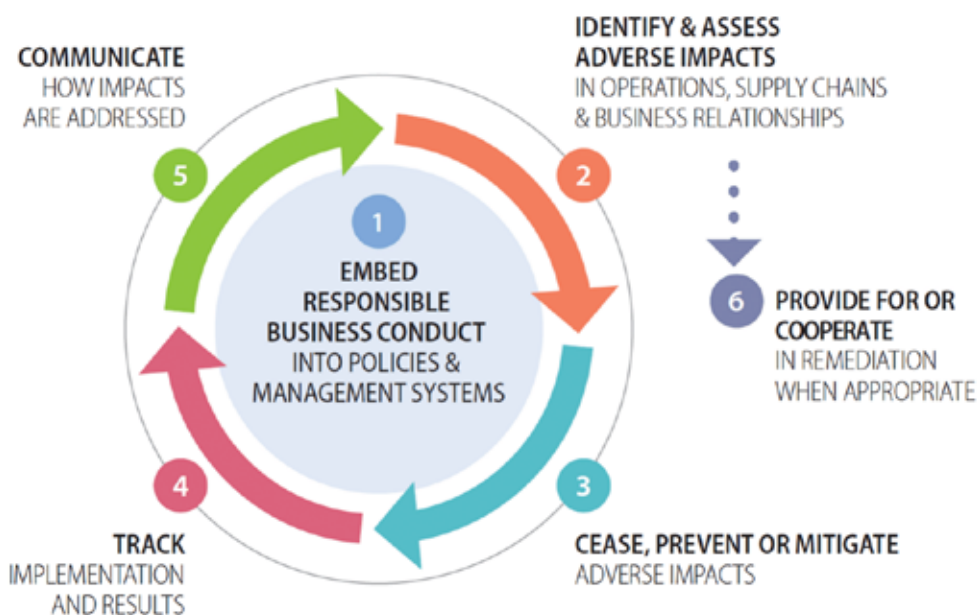
1) Available at [www.shedil.org](http://www.shedil.org)

2) Finance and maritime sectors are not included in the 2023 index, as compared to the 2022 version.

3) <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

4) <https://www.worldbenchmarkingalliance.org/publication/gender/>

5) [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---ipec/documents/publication/wcms\\_854733.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf)



**Figure 1: Due Diligence process and supporting measures<sup>6</sup>**

International human rights law includes protections for women workers in several ways. Article 11 of the Convention on the Elimination of All Forms of Discrimination against Women states, “States Parties shall take all appropriate measures to eliminate discrimination against women in the field of employment in order to ensure, on a basis of equality of men and women, the same right.”<sup>7</sup> In 2019, the 108<sup>th</sup> ILO Conference adopted Convention 190 on Violence and Harassment, in which the fight against gender-based violence at the workplace is an explicit element. The Convention was ratified by the Norwegian Parliament in June 2023, and is foreseen to enter in to force in October 2024.<sup>8</sup> Similar measures are also found in the Norwegian Equality and Anti-Discrimination Act, from 2018. The Norwegian Transparency Act, which entered into force on 1 July 2022, is a major milestone for the society’s expectations to responsible business conduct. It is the first legal provision that establishes the possibility of sanctioning companies for failing to conduct a human rights due diligence for their operations, including the supply chain. Carrying out such assessments is at the core of the UNGPS and the OECD guidance, but until recently not anchored in hard law. Although the Transparency Act

does not mention gender explicitly, §4 b) states clearly that companies shall “identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed toward, or that are directly linked with the enterprise’s operations, products or services via the supply chain or business partners”. In its 2019 landmark report,<sup>9</sup> the UN Working Group on Business and Human Rights underlined that it is “...widely documented that women and girls experience adverse impacts of business activities differently and often disproportionately” and urges companies to apply the gender lens to their human rights approach.

Furthermore, section 25 of the Equality and Anti-Discrimination Act includes a duty of employers to promote equality, and its section 26a includes a duty of employers to issue a statement on the current state of and measures for gender equality.<sup>10</sup>

At EU-level, the process towards the adoption of the Corporate Sustainability Due Diligence Directive (CS DDD) entered a new phase in June 2023, when the three EU

6) <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

7) <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>

8) <https://lovdata.no/dokument/NLE/lov/2021-06-18-99>

9) <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/BookletGenderDimensionsGuidingPrinciples.pdf>

10) <https://lovdata.no/dokument/NLE/lov/2017-06-16-51>, sec. 25a, 26.

bodies (the Commission, the Council and the Parliament) began trilogue negotiations. On 14 December 2023, the negotiations concluded with the requirement that large companies operating in Europe conduct human rights and environmental due diligence regarding actual and potential adverse impact with respect to their own operations, including subsidiaries, and those carried out by their business partners. Thus, another major step is taken towards a market space where human rights due diligence are an integrated part of regular business operations. Having said that, it is important to underline that in the Norwegian as well as in the EU case, major steps remain in order to ensure that the due diligence actually addresses the real risks for workers, the environment and local communities along the value chains, including the situation for women and girls. In March 2023, a coalition of more than 140 NGOs presented specific suggestions to EU to ensure a gender-responsive legislation and will keep pushing for that in the next phase.<sup>11</sup> It is also worthwhile noting a landmark Dutch court ruling from November 2023, where a company was fined for having behaved irresponsibly when abruptly ending a contract with one of its suppliers.<sup>12</sup>

### Selection of companies and sectors

Compared to the first version of the SheDil Index, it was chosen not to include the finance and the maritime sectors, but to keep all the other companies and sectors to be able to assess any changes over the last 12-18 months. For all five sectors the main risks of being involved in human rights breaches are linked to their global supply chains, be it purchase of products or use of sub-contractors. The extractive/energy companies, and to a somewhat lesser extent the marine sector, also have their own operations in countries with known human rights risks. However, it is also important to underline that there is a gap to close before full equality is achieved also within the Norwegian operations. As mentioned in the 2022- version of the index, sectors and companies were chosen based on a combination of known human rights risks in the value chain, its importance in the Norwegian market, and the relative importance of Norwegian companies in the sector globally, such as the marine sector. The selected companies

are either Norwegian-owned and -based or have a strong presence in the Norwegian market. Most are privately-owned, but the study also includes partially and fully state-owned companies, like Equinor, Statsbygg and Vinmonopolet. The purpose of the study is to assess to what extent, and how the selected companies are integrating a gender perspective in their human rights due diligence. It does not provide a statistically representative analysis of a sector but rather a status for the companies covered, as representatives for their sector and individually. The five sectors, each represented by five companies, are shown in table 1 below.

Nine of the companies are members of Ethical Trade Norway,<sup>13</sup> 13 have joined UN Global Compact,<sup>14</sup> two companies are members in both initiatives, and eight of the 25 companies covered in this study are included in the 2023 SHE Index, a survey-based tool operated by EY and created to spur diversity and inclusion.<sup>15</sup> The SHE Index differs from the SheDil Index in its main focus on a company's own operations and it being a self-reporting tool. For more details, see SheDil Index 2022,<sup>16</sup> and [www.sheindex.com](http://www.sheindex.com).

11) For details see <https://corporatejustice.org/wp-content/uploads/2023/03/Ensuring-a-Gender-Responsive-CSDDD-March-2023-1.pdf>

12) <https://uitspraken.rechtspraak.nl/#/details?id=ECLI:NL:RBAMS:2023:7299> (in Dutch)

13) See <https://etiskhandel.no/vare-medlemmer/>

14) See <https://unglobalcompact.org/what-is-gc/participants>

15) See <https://sheindex.com/no>

16) <https://www.fokuskvinner.no/aktuelle-saker/lansering-shedil-indeksrapport-beskytter-bedrifter-kvinner-rettigheter/>



**Table 1: Companies assessed for each sector**

Construction	Food/ Agriculture	Extractives/ Energy	Garment/ Textiles	Marine
AF Gruppen	Bama- Gruppen	Aker BP	Helly Hansen Group	Austevoll Seafood
Saint-Gobain Norway (Dahl- Optimera) <sup>17</sup>	Nortura	Equinor	Kid	Cermaq Group
Skanska Norge	Orkla	Norsk Hydro	Nor Tekstil	Lerøy Seafood Group
Statsbygg	Unil (Norges- Gruppen)	Scatec Solar	Princess	Mowi
Veidekke	Vinmonopolet	Yara International	Varner Group	Salmar

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17) Dahl-Optimera changed its name to Saint-Gobain Norway Distribution in March 2023.

## The SheDil Index

All information in this report draws from open sources, based on the explicit recommendation in UNGP principle 21 for companies to report and inform publicly. The resources used for the assessment include the companies' annual and sustainability reports, statements on the Norwegian Transparency Act, CoCs and ethical guidelines, policy documents, and the Responsible Business Conduct reports for members of Ethical Trade Norway. The study is based on publicly available information as per November 2023. All companies were given the opportunity to review and comment on the draft assessment of their operations. A minor share of the companies responded to this. The complete reference list of sources used for each company is available upon request.

This assessment is the second application of the SheDil Index, based on the SheDil tool. The SheDil tool is structured around four business relationships: (1) own operations, (2) suppliers or subcontractors, (3) agents, recruiters, or other middlemen, and (4) other stakeholders (e.g., local communities, rights-based organisations, trade unions, and public authorities). The SheDil Index aggregates actors (2) and (3) as "suppliers" and distinguishes between three spheres of impact as shown in figure 2 below.

For each sphere, three to five indicators were developed to assess how the companies are integrating the gender dimension in their efforts to ensure responsible business conduct. In order to capture the nuances along the different indicators, five different scoring grades have been defined in the traffic light scoring system. Due to the different nature of the indicators, some have been scored across all five levels, while others have fewer levels, such as when there is not enough variation in company policy or practice.

The SheDil Index's five-level traffic light scoring system is marked red, orange, yellow, light-green, and green. A general description of the scoring system is that a red light signifies no publicly available information, a yellow light signifies a non-gender-responsive approach to human rights due diligence, and a green light signifies full integration of the gender dimension in the due diligence system. In the following tables, the scoring criteria for each sphere of impact are explained.

**Figure 2: SheDil Index spheres of impact (or business relationships)**



### Scoring rubric

The statements found in the following tables reflect the approach and recommendations in the SheDil tool and are thus fully aligned with the UNGP and the OECD Guidance when it comes to applying a gender-responsive approach to human rights due diligence. For more information, see Annex Q2 of the OECD Guidance

regarding “How can an enterprise integrate gender issues into its due diligence?” which highlights the importance of identifying context- and sector-specific risks, collecting gender-disaggregated data, women’s full and meaningful participation, etc.






### For a company’s own operations

**Table 2: Scorecard for own operations**

1	Assessment question					
1A	Does the company have a public policy on gender equality (equal pay, diversity, etc.)?	No	Has a code of conduct or ethical guidelines that mention gender, equal opportunities, and/or non-discrimination	Has a sustainability or corporate social responsibility policy that mentions gender, equality opportunities, and/or non-discrimination	Has a human rights or diversity and inclusion policy	Yes, with concrete goals and including geographic scope
1B	Does the company report on gender equality?	No	Norwegian operations only	Reports on some parameters	Reports on most parameters excluding the gender pay gap	Yes, on most parameters (workforce composition, wages), including in all global operations
1C	Has top management/ the board of directors committed to gender equality?	No		Explicitly seeks to achieve gender equality but without a specific target		Yes, including an annual report signed by the board, regular reporting to the board, and a specific target






## For suppliers, subcontractors, agents, recruiters and other intermediaries

Table 3: Scorecard for suppliers

2	Assessment question					
2A	Are gender-related risks described in the company's annual report, human rights due diligence process, or other formats?	Company does not have a due diligence process		Company's due diligence process includes human rights and/or environmental, social, and corporate governance but is not genderspecific		Well described, including sector-specific risks
2B	Is gender integrated into the code of conduct or expectations to the code of conduct?	Company does not have a code of conduct for suppliers		Code of conduct for suppliers has expectations on gender, equal opportunities, non-discrimination, human rights, and/or environmental, social, and corporate governance		Additional risks for women are properly described
2C	Does the company collect/report on gender-disaggregated information about the workforce?	No	Composition only			Wage and work force composition at different levels
2D	Has the company taken any gender-related initiatives, or is it part of any joint efforts?	No		General measures to improve gender balance		Specific cases and/or initiatives to promote and/or protect women workers
2E	Does the company collect information on maternal rights, childcare, and/or sanitary facilities?	No				Part of regular reporting

## For other stakeholders, including local communities

**Table 4: Scorecard for other stakeholders**

3	Assessment question					
3A	Are gender-related risks for external stakeholders mentioned in code of conduct, annual report, website, etc.?	No		Conducts regular materiality analysis that highlights the company's impact on human rights and/or local communities		Described in detail and related to the company's business operations
3B	Has the company engaged with external stakeholders on genderrelated risks?	No		Engagement with non-governmental organisations and/or local communities that could include gender-related risks  And/or local projects that explicitly addresses gender issues in communities linked to the company's operations or supply chain		Systematically and regularly engages with women's human rights defenders, non-governmental organisation, and/or local communities on specific topics
3C	Has the company modified policies or practices to reduce the (potential) negative impact of their business on women stakeholders?	No		Has modified general policies or practices but without an explicit gender lens		Concrete measures linked to core business activities
3D	Has the company engaged in gender-responsive remediation processes, either alone, jointly, or through support to others?	No	Has a publicly accessible whistleblowing channel	Has a grievance mechanism for local communities	Remediation process pays special attention to women's rights	Actively in processes with concrete results
3E	Has the company expressed support to women's human rights defenders?	No	Has expressed support to HR defenders in general			Public statements in specific cases

## Key Findings

The scoring is based on publicly available information at the time of conducting the assessment. (Individual company scores on each question are reflected in tables 7-9 below.)

In the overall picture, the study revealed (see figures 3 and 6 below)

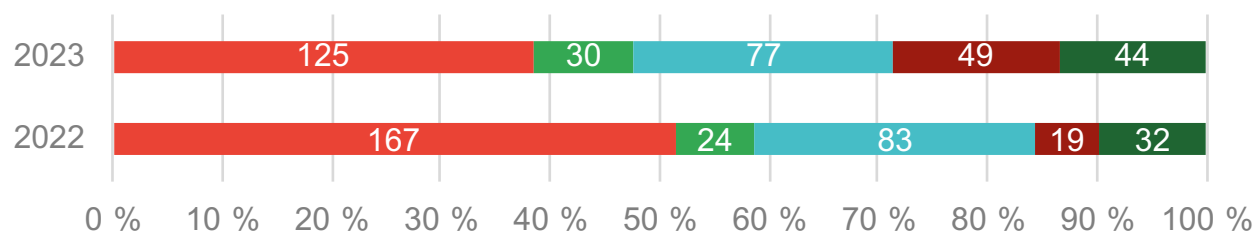
- Improvements in all sectors and in relation to all stakeholders
- That the share of red scores (“no relevant information available”) is reduced from 51% to 38%
- A doubling of the two top scores from 16% to 29%

Still, it is worth noting that, according to publicly available information,

- Only two companies, both from the garment sector, collect gender-disaggregated data on the workforce in their supply chain.
- Only one company, from the agricultural sector, collects data on maternal rights/sanitary facilities in the supply chain.
- Only one (extractive) company has publicly expressed support to human rights defenders.
- No company is found to have engaged in gender-responsive remediation processes.

**Figure 3: Distribution of scores, all indicators and all companies, 2023 vs 2022**

*N=325 (25 companies and 13 indicators)*

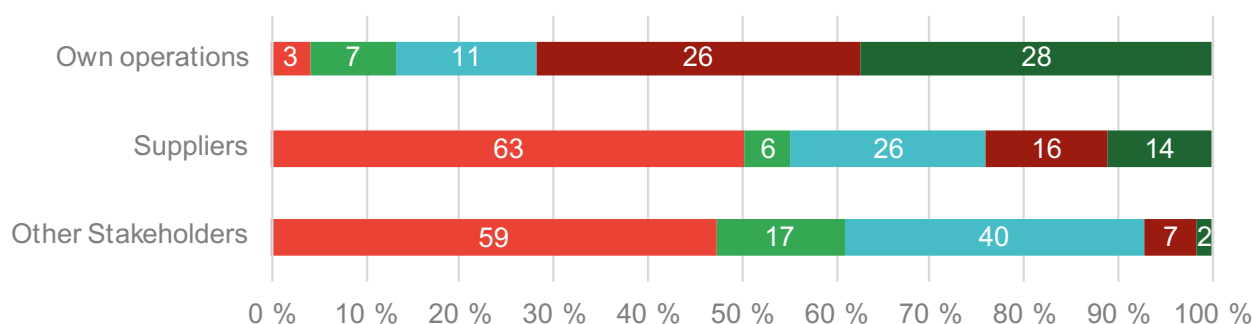


An analysis of the distribution of scores between the different business relationships, or spheres of impact shows that, as in 2022, companies have a better grip on integrating the gender lens in their own operations than with their suppliers and other stakeholders (See figure 4 below). The major improvements from 2022 to the 2023 index are more detailed targets and reporting with gender-disaggregated data in own operations. Regarding

the supply chain, several companies have a better risk, or materiality analysis and updated CoCs or other relevant policies, and some have engaged with other actors to address gender specific risks. As for other stakeholders, strengthened engagement with local actors, improved policies and due diligence processes are the main improvements.

**Figure 4: Distribution of scores by business relationship**

*N=75 for own operations (3 indicators), and 125 for suppliers and other stakeholders (5 indicators each)*



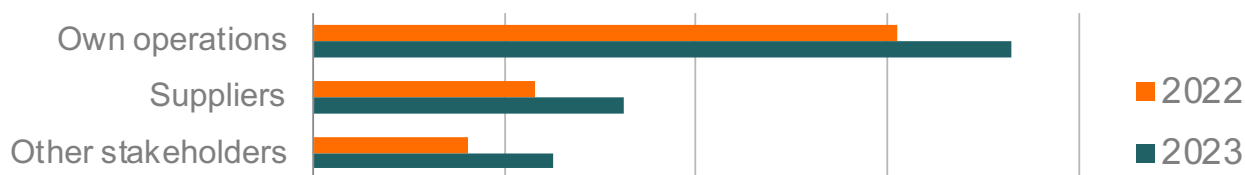
All scores reflected in figure 5 and further below are calculated applying the following formula:

$$\left( \begin{array}{c} \bullet \\ \bullet \\ \bullet \end{array} \times 0 \right) + \left( \begin{array}{c} \bullet \\ \bullet \\ \bullet \end{array} \times 1 \right) + \left( \begin{array}{c} \bullet \\ \bullet \\ \bullet \end{array} \times 2 \right) + \left( \begin{array}{c} \bullet \\ \bullet \\ \bullet \end{array} \times 3 \right) + \left( \begin{array}{c} \bullet \\ \bullet \\ \bullet \end{array} \times 4 \right)$$

The five sectors and the 25 companies included in this report have their own risk characteristics that one would expect to be reflected in their policies and reporting. All sectors are most mature when it comes to own operations, it is worth noting that the garment and textile sector score for supply chain is almost at par with own operations. Given the long-term focus on the situation for women workers in the global supply chains for clothing, it is not surprising that the sector is among the best in integrating the gender lens in their supply chain, but the study also finds a considerable room for improvement within the companies' own operations. The picture reversed for the construction and marine sectors, with a relatively high score in own operations, compared to being at the bottom for supply chains, thus needing to make significant efforts in order to fully integrate the rights for women and girls in their supply chain due diligence.

The inclusion of the gender dimension is by far most visible within the companies' own operations also in 2023. (See figure 5 below.) The improvement in scores in absolute numbers is also largest for own operations. However, it gives some grains of hope noticing that the relative increase in scores, although from low levels, is significant for both suppliers (40% compared to 2022) and other stakeholders (54%). As for suppliers, four companies (Nortura, Norsk Hydro, Scatec Solar and Lerøy Seafood Group) account for 50% of the increase in the overall score, all four companies being among the top improvers listed in table 5 below. The main changes are found within general human rights due diligence/ materiality risks assessments, in some cases also with the addition of the gender lens, as well as some companies being part of collaborative initiatives to address gendered risks in their supply chains. When it comes to other stakeholders, improved policies and materiality analysis on gender specific risks in the agricultural and marine sectors are the most significant contributions to the increased score. Also here, four companies (Vinmonopolet, Yara International, Lerøy Seafood Group and Nortura) from the top ten lists in table 5 make up 50% of the increased aggregated score.

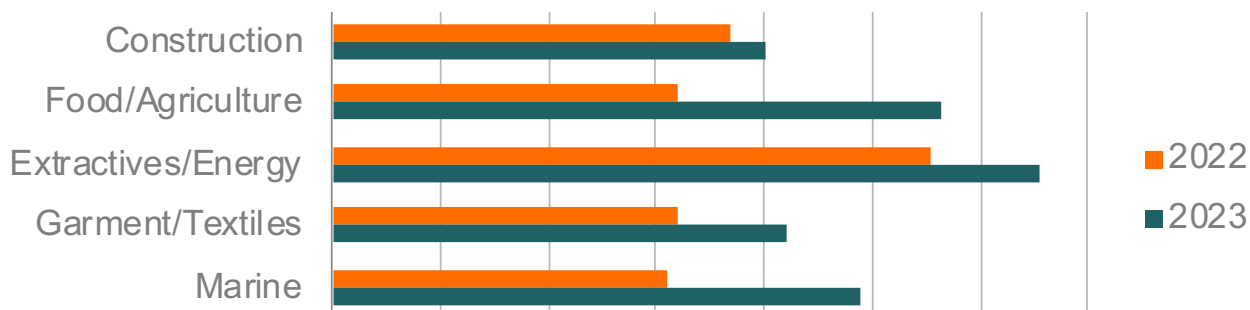
**Figure 5: Aggregate scores by sphere of impact, 2023 vs 2022**



The agricultural sector is with a solid margin the best improver from 2022 to 2023, with better reporting on gender-specific data, better overall materiality analysis, some companies also with an improved focus on gender,

as well as a strengthened focus on local communities in the companies' due diligence approach. The same areas of changes are also found within the runner-up improver, the marine sector, although with less advances.

**Figure 6: Aggregate scores per sector, 2023 vs 2022**



As for individual companies, Nortura, Vinmonopolet and Lerøy Seafood Group stand out as the top three improvers since the 2022 SheDil Index, followed by a

larger group of other companies. The main elements of the progress that was identified during the assessment of the individual companies are reflected in table 5 below.

**Table 5: Top improvers from 2022 to 2023**

Company	Change, overall score	Main improvements
Nortura	17	Introduced gender targets in own operations. Identified gendered risks in the supply chain, initiated cooperation with industry actors to promote equality.
Vinmonopolet	16	Published supply chain materiality analysis for some countries, focus on women and migrant workers. Has joined efforts with suppliers to fight gendered violence.
Lerøy Seafood Group	13	Improved reporting in own operations, related to the Transparency Act. Collaborated with supplier for designing and producing working gear for women. Materiality assessment including stakeholders and updated several policies.
Yara International	8	Public CEO pledge with industry actors for diversity and equality regarding gender and ethnicity. Improved supplier CoC and supply chain HRDD, although not explicitly gender responsive.
Salmar	8	Published its first Gender equality report, has updated several relevant policies. Improved reporting and supply chain HRDD, although not gender responsive.
Austevoll Seafood	7	Improved HRDD, gender risks mentioned for two daughter companies.
Scatec Solar	7	Established an internal gender task force. Part of gender project with UN Women in Pakistan and Brazil.
Bama-Gruppen	6	Gendered reporting and targets in own operations.
Norsk Hydro	6	Part of European Industry network to promote workplace gender equality.
Unil	6	Some improvements in reporting on own operations. HR DD for suppliers and stakeholders and some policy updates.



## LO's\* work on gender equality in the workplace

By Kathrine Fauske, Assistant director, International department, LO

Despite some improvements over the past 20 years, gender inequality remains one of the most pressing challenges in the world of work today, with persistent inequalities between women and men in access to the labour market and conditions at work. Key hurdles to gender equality include political and structural barriers and gender norms. Globally, women hold only 75 % of men's legal rights. Discrimination against women is widespread in the labour market, with persistent gender pay gaps. Social protection systems provide income security for workers and families, but half the world's population lacks access to such systems, and the pandemic exposed huge gaps in coverage. Women, informal sector workers and the poorest were hit hardest. Millions lost their jobs without unemployment benefits or had to continue going to work and risk their health to sustain a livelihood.

Gender equality is essential for achieving decent work for all because it ensures that opportunities, rights, and treatment in the workplace are unbiased, creating an environment where everyone can thrive and contribute without discrimination.

To enable societal changes, LO and our partners recognise that trade unions need to start by looking at own structures, policies, practices, and organisational cultures. LO is using participatory gender audits as a tool in the vital task to increase partner organisations, including their leadership's, awareness of and self-reflection on gender equality. This has contributed to recruitment of more women into trade unions. **Having more women trade union leaders means more women at the negotiation tables. We have seen that this leads to increased focus on gender equality and women's rights in the collective agreements.** Our partner organisation MCTU in Malawi succeeded in increasing the share of women negotiating collective agreements from 6 to 40 % during the last five years. Together with strengthened legal advocacy this represent a major contribution from trade unions towards improving gender equality in the society.

Many LO partners are now involving men in their gender training activities. This is important because men need to understand the meaning of gender equality and to recognise the role of women in trade unions, particularly in male dominated sectors. The feedback so far has been encouraging.

Sexual harassment at the workplace is a major challenge in many countries where LO works. Women are frequently subject to demands of sexual favours in return for employment, training opportunities, promotion, or wage increases, as well as other unwanted sexual attention from colleagues. To address these challenges, LO and partners worked actively with the ILO Convention 190 (C190) on violence and harassment towards its adoption by the International Labour Conference in 2019. Since then, several of LO's partner organisations have raised awareness of and campaigned for ratification of C190 in their respective countries. The ratification gives trade unions an entry point to negotiate collective agreements that include the elimination of violence and harassment at the workplace. The convention itself acknowledges the importance of trade unions in the realisation of its provisions.

The Covid-19 pandemic brought with it an increase in gender-based violence (GBV) in many countries, and LO's trade union partners assisted members with a significant number of cases. In Malawi, a total of 504 sexual harassment cases were handled between 2019 and 2022, the majority in the agriculture, commercial, hospitality and public health sectors. For example, in the tea sector, 36 women were compensated with USD 2 300 for GBV. Many women who were victimised and dismissed were reinstated in their jobs and perpetrators of sexual harassment fired.

In Zimbabwe, LO's sister organisation ZCTU managed to assist and resolve 95 cases of GBV and sexual harassment at the workplace. They reached the target groups through awareness campaigns on social media and by sharing information with all its shop stewards across Zimbabwe. In 2022, LO's Colombian partner USO supported 300 women in harassment cases in the very male-dominated petroleum sector in Colombia, an important measure to ensure future recruitment and growth of women in the sector.

**SheDiL**.org key check point:

- Encourage independent trade unions:
- *Request suppliers to facilitate women's participation and representation in trade unions*
  - *As for gender-disaggregated data on union membership*

\* The Norwegian Confederation of Trade Unions

## Company scores

The following tables place the individual companies within the framework of this assessment. In table 6, companies are categorised according to the combined scores across all three spheres of impact, while tables 7-9 maps each company along the sets of indicators

developed for each sphere. The findings reflect the detailed analysis behind the accumulated findings discussed above. These are based on assessments of each company along each of the 13 indicators.






### Aggregate

**Table 6: Company scores for three spheres of impact combined**

Company	Sector	Score	Quartile
Yara International	<i>Extractives / energy</i>	31	<b>Top 25%</b>
Vinmonopolet	<i>Food / agriculture</i>	28	
Scatec Solar	<i>Extractives / energy</i>	28	
Norsk Hydro	<i>Extractives / energy</i>	27	
Equinor	<i>Extractives / energy</i>	26	
Lerøy Seafood Group	<i>Food / agriculture</i>	26	
Unil	<i>Food / agriculture</i>	26	
Varner Group	<i>Garment / textile</i>	25	<b>25-75%</b>
Orkla	<i>Food / agriculture</i>	24	
Kid	<i>Garment / textile</i>	23	
Nortura	<i>Food / agriculture</i>	23	
Saint-Gobain Distribution Norway	<i>Construction</i>	20	
Aker BP	<i>Extractives / energy</i>	19	
Austevoll Seafood	<i>Marine</i>	19	
Mowi	<i>Marine</i>	19	<b>25-50%</b>
Veidekke	<i>Construction</i>	19	
Salmar	<i>Marine</i>	18	
Cermaq Group	<i>Marine</i>	16	
Nor Tekstil	<i>Garment / textile</i>	16	
Skanska Norge	<i>Construction</i>	16	
AF Gruppen	<i>Construction</i>	14	
Bama- Gruppen	<i>Food / agriculture</i>	12	
Statsbygg	<i>Construction</i>	11	
Helly Hansen Group	<i>Garment / textile</i>	11	
Princess	<i>Garment / textile</i>	7	

## Own operations

Table 7: Company scores on own operations

Assessment question	Sector					
<b>1A</b> Does the company have a public policy on gender equality (equal pay, diversity, etc.)?	Construction		AF Gruppen, Statsbygg		Skanska Norge	Saint-Gobain Norway, Veidekke
	Food/ agriculture		Bama-Gruppen, Nortura	Unil	Orkla, Vinmonopolet	
	Extractives/ energy				Aker BP, Equinor, Norsk Hydro, Scatec Solar,	
	Garment/ textiles		Helly Hansen Group, Princess,	Varner Group	Kid, Nor Tekstil	
	Marine		Cermaq Group		Austevoll Seafood, Lerøy Seafood Group, Salmar	Mowi
<b>1B</b> Does the company report on gender equality?	Construction				Saint-Gobain Norway, Skanska Norge, Statsbygg	AF Gruppen, Veidekke
	Food/ agriculture			Nortura, Unil	Bama-Gruppen	Orkla, Vinmonopolet
	Extractives/ energy				Scatec Solar	Aker BP, Equinor, Norsk Hydro, Yara International
	Garment/ textiles	Helly Hansen Group, Princess			Kid, Nor Tekstil Varner Group	
	Marine			Austevoll Seafood	Cermaq Group	Lerøy Seafood, Group, Salmar, Mowi
<b>1C</b> Has topmanagement/ Board of Directors committed to gender equality?	Construction			Skanska Norge	Statsbygg	AF Gruppen, Saint-Gobain Norway, Veidekke
	Food/ agriculture				Bama-Gruppen, Nortura	Orkla, Unil Vinmonopolet
	Extractives/ energy					Aker BP, Equinor, Norsk Hydro, Scatec Solar, Yara International
	Garment/ textiles	Princess	Helly Hansen Group	Kid Varner Group	Nor Tekstil	
	Marine			Austevoll Seafood, Cermaq Group	Salmar	Lerøy Seafood Group, Mowi




## Suppliers

**Table 8: Company scores on their supplier relations**

Assessment question	Sector					
<b>2A</b> Are gender-related risks described in the company's annual report, human rights due diligence process, or other formats?	Construction		Statsbygg	AF Gruppen, Saint-Gobain Norway, Skanska Norge, Veidekke		
	Food/ agriculture			Bama-Gruppen, Orkla	Nortura	Unil, Vinmonopolet
	Extractives/ energy			Aker BP, Equinor, Norsk Hydro	Scatec Solar, Yara International	
	Garment/ textiles			Princess	Kid, Nor Tekstil Helly Hansen Group	Varner Group
	Marine			Lerøy Seafood Group, Mowi Cermaq Group, Salmar	Austevoll Seafood	
<b>2B</b> Is gender integrated into the code of conduct or expectations to the code of conduct?	Construction	Statsbygg		AF Gruppen, Saint-Gobain Norway, Skanska Norge, Veidekke		
	Food/ agriculture		Vinmonopolet	Nortura	Bama-Gruppen Orkla, Unil	
	Extractives/ energy			Aker BP, Scatec Solar,	Norsk Hydro, Yara International	Equinor
	Garment/ textiles			Helly Hansen Group, Nor Tekstil, Princess		Kid, Varner Group
	Marine		Austevoll Seafood, Salmar	Cermaq Group, Lerøy Seafood Group, Mowi		
<b>2C</b> Does the company collect/report on gender-disaggregated data about the workforce?	All sectors (see exception)	All companies (see exceptions)				
	Garment/ textiles		Helly Hansen Group, Varner Group			
<b>2D</b> Has the company taken any gender-related initiatives, or is it part of any joint efforts?	Construction	AF Gruppen, Saint-Gobain Norway, Skanska Norge, Statsbygg, Veidekke				
	Food/ agriculture	Bama-Gruppen, Orkla			Nortura	Vinmonopolet, Unil
	Extractives/ energy	Aker BP			Equinor	Yara International, Norsk Hydro, Scatec Solar
	Garment/ textiles	Helly Hansen Group, Nor Tekstil, Princess				Kid, Varner Group
	Marine	Austevoll Seafood, Cermaq Group, Mowi, Salmar				Lerøy Seafood
<b>2E</b> Does the company collect data on maternal rights, child care, and/or sanitary facilities?	All sectors (see exceptions)	All companies				
	Food/ agriculture	Bama-Gruppen, Orkla, Unil, Vinmonopolet			Nortura	

## Other stakeholders

**Table 9: Company scores on other stakeholders**

Assessment question	Sector					
<b>3A</b> Are gender-related risks for external stakeholders mentioned in the code of conduct, annual report, website, etc.?	Construction	AF Gruppen, Statsbygg, Veidekke		Saint-Gobain Norway, Skanska Norge		
	Food/agriculture	Bama-Gruppen, Nortura		Orkla	Unil	Vinmonopolet
	Extractives/energy	Aker BP	Scatec Solar	Equinor, Norsk Hydro, Yara International		
	Garment/textiles	Helly Hansen Group, Nor Tekstil, Princess		Kid, Varner Group		
	Marine		Mowi	Salmar Austevoll Seafood, Cermaq Group, Lerøy Seafood Group		
<b>3B</b> Has the company engaged with external stake-holders on gender-related risks?	Construction	AF Gruppen, Statsbygg		Saint-Gobain Norway, Skanska Norge, Veidekke		
	Food/agriculture	Bama-Gruppen	Vinmonopolet	Orkla, Unil	Nortura	
	Extractives/energy			Aker BP, Equinor, Norsk Hydro, Scatec Solar, Yara International		
	Garment/textiles		Princess	Helly Hansen Group, Kid, Nor Tekstil,	Varner Group	
	Marine		Cermaq Group	Austevoll Seafood, Lerøy Seafood Group, Mowi, Salmar		
<b>3C</b> Has the company modified policies or practices to reduce the (potential) negative impact of their business on women stakeholders?	Construction	All companies				
	Food/agriculture	Bama-Gruppen	Vinmonopolet	Unil	Nortura, Orkla	
	Extractives/energy	Equinor, Norsk Hydro	Aker BP			Scatec Solar, Yara International
	Garment/textiles	Kid, Nor Tekstil, Princess, Helly Hansen			Varner Group	
	Marine	Mowi, Salmar		Austevoll Seafood, Cermaq Group, Lerøy Seafood Group		
<b>3D</b> Has the company engaged in gender-responsive remediation processes, either alone, jointly, or through support to others?	Construction		AF Gruppen, Saint-Gobain Norway, Skanska Norge, Statsbygg, Veidekke			
	Food/agriculture	Bama-Gruppen, Nortura, Unil	Orkla	Vinmonopolet		
	Extractives/energy		Aker BP	Equinor, Norsk Hydro, Yara International, Scatec Solar		
	Garment/textiles	Kid, Nor Tekstil, Princess, Varner Group	Helly Hansen Group			
	Marine	Mowi	Cermaq Group, Lerøy Seafood Group, Salmar	Austevoll Seafood		
<b>3E</b> Has the company expressed support to women's human rights defenders?	All sectors (see exceptions)	All companies				
	Food/agriculture	Aker BP, Equinor, Scatec Solar, Yara International	Norsk Hydro			

# Findings by sector



**Construction**



**Food/  
agriculture**



**Marine**



**Extractives/  
energy**



**Garment/  
textiles**

# Construction

## AF Gruppen, Dahl Optimera, Skanska Norge, Statsbygg, Veidekke

Improvements from 2022 to 2023 are found in more detailed reporting, both for own operations and in the supply chain, while the reduced score for other stakeholders is due to a minor recalibration. In the overall picture, the construction companies assessed in this report have considerable room for improvements, also compared to the majority of other companies included in this report.

### Own operations

AF Gruppen states in its 2022 annual report that “Construction, civil engineering and industry are traditionally male-dominated sectors where there is a risk of conscious and unconscious gender discrimination.” One illustration of this imbalance is that Skanska Norge in its annual report states that only four percent of their craft workers are women. On the other hand, 25 percent of their most senior levels and 38 percent of Skanska’s Board of Directors that were elected at the AGM in 2022 are women. Most companies in this sector have general CoCs or policies mentioning diversity and inclusion. One notable exception is Veidekke, which has a gender-specific policy. The sector’s performance shows improvements regarding gender equality reporting, with Dahl Optimera, Statsbygg and Veidekke having concrete targets. Each company report on most parameters, and with Dahl Optimera and Veidekke also reporting on the gender pay gap. Furthermore, most companies in the sector have a specific target for gender equality, and gender-specific recruitment processes, such as Veidekke’s goal of women accounting for 50 percent of students working on summer jobs by 2025. In previous years, we have seen that organisational changes, such as to provide for separate changing rooms for men and women on construction sites, are ways to improve the gender balance.

### Suppliers

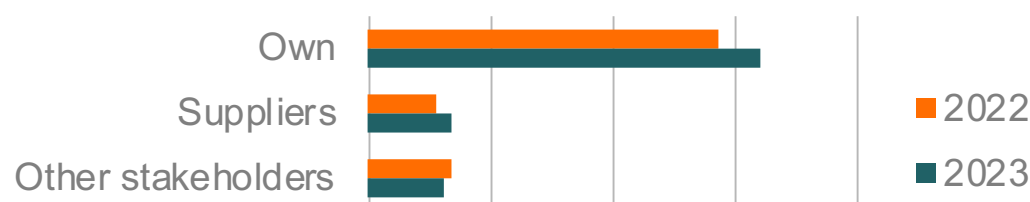
The construction sector shows the lowest performance with regard to suppliers compared to the other sectors. Although all companies in the sector have a CoC for suppliers, only Veidekke’s code include gender-specific requirement. This year, although not gender specific, most companies explain that they have a human rights due diligence process. This is essential as the sector relies heavily on temporary workers, as well as

materials and equipment supply chains. Veidekke is an outlier, as the company’s CoC highlights the importance of having a working environment without hostile, violent, threatening, or harassing conduct and states that “actions that reasonably can be perceived as offensive or intimidating, including any form of unwanted attention of a sexual nature, are unacceptable.” In this sector, the corporate responsibility to protect migrants’ rights is pivotal, as shown by the violations occurring during the construction for the 2022 football World Cup in Qatar. FIFA failed to perform human rights<sup>18</sup> due diligence before awarding Qatar the hosting rights, thereby ignoring the importance of this process in the construction sector.

### Other stakeholders

Most companies in the construction sector do not identify gender-related risks for external stakeholders and is the sector with the lowest performance score regarding this group. Although not a proper risk assessment approach, it is worth mentioning Dahl Optimera and its parent company’s Saint-Gobain Foundation. The foundation seeks to create local employment and decent housing in the communities it operates and to “improve the living conditions of the most disadvantaged by supporting education-related projects, in particular for young girls.” Skanska Norge and Veidekke report that they engage with external stakeholders such as NGOs and/or local communities, but there seems to be little or no focus on gender-related risks in these engagements. Finally, all of the companies in the sector have a whistleblowing channel that external stakeholders can access to report gender-related concerns. However, the companies should take steps to ensure that other stakeholders have access to remedy for gendered human rights violations.

**Figure 7: Construction sectors scores by sphere of impact, 2022 vs 2023**



18) <https://www.hrw.org/news/2021/12/18/qa-migrant-worker-abuses-qatar-and-fifa-world-cup-2022>

## Food/agriculture

### Bama-Gruppen, Nortura, Orkla, Unil, Vinmonopolet

At the aggregate level, the sector shows solid improvements within all spheres of impact. More detailed reporting, in some cases also linked to the Norwegian Transparency Act, improved materiality / risk analysis and a gender-focused project with stakeholders in the supply chain are the main elements behind the improved scoring from 2022 to 2023.

#### Own operations

Most companies in the food/agriculture sector have a CoC that mentions gender and/or non-discrimination, and the sector shows a general improvement with regard to policy work. Most of the companies' policies have a particular focus on non-discrimination and harassment. Orkla's human rights policy states that their group companies shall work systematically to promote diversity in the workplace and prevent discrimination based on gender. The employees at Vinmonopolet's stores, have a collective bargaining agreement, highlighting the value of trade unions in eliminating the gender pay gap. Regarding gender equality reporting, the practice of most companies has improved compared to last year's SheDil Index report, with Orkla and Vinmonopolet in the lead, and where Orkla's reporting is particularly thorough. This year, all the companies have set up targets for gender equality. Orkla and Unil have a target of 50 per cent women managers and 40-60 per cent gender balance in the entire company, respectively. Orkla requires at least one female candidate when recruiting new management employees. Such recruitment policies are critical for improving the gender balance in the long-term

#### Suppliers

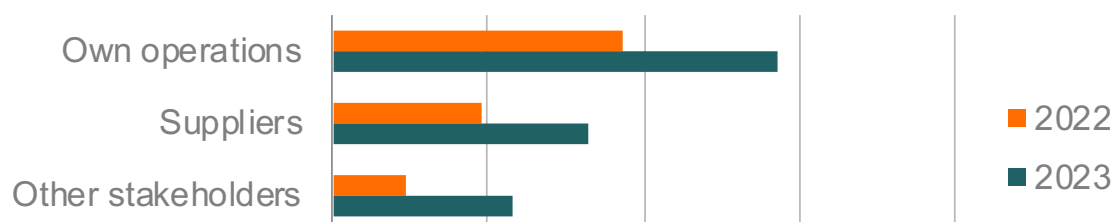
The sector's performance in this sphere is average but should improve given that women workers face discriminatory acts, including ownership and control over land and natural resources, as well as barriers to financial services and formal markets. Based on publicly available information, we see that Nortura has made a thorough risk assessment this year and identified that for primary suppliers represent risks in relation to women's rights, such as maternity and parental leave. Bama-Gruppen has a risk assessment tool, but it mentions discrimination as a high risk without specifying how that relates to gender. Vinmonopolet has a "pre-assessment and auditing process" that account for the political, economic, social, and environmental factors of each country where the company has trading partners

and works together with the wine monopolies in the Nordics to achieve stronger leverage to improve the working conditions in their supply chains. Orkla prioritises the suppliers and supply chains where the risk of non-compliance with Orkla's Code of Conduct is the greatest. Additionally, Unil highlights that women's economic participation in the Pakistani rice sector is a gender-related risk the company faces due to local conditions, such as poverty, poor working conditions, and climate change. The company's gender-related initiative/ joint effort is related to this risk. Unil is part of Oxfam's Gender Transformative and Responsible Business Investment in Southeast Asia project. The project aims at strengthening the farmers position in relation to payment, farming methods and better access to the marketplace. It has i.a. led to that 2500 small scale farmers have become members of farmers' organisations, of which half is led by women. Lastly, every company in the sector has a CoC for suppliers or requires suppliers to sign its own CoC mentioning gender.

#### Other stakeholders

The sector needs improvement in this sphere, which is particularly important given the relationship between gender equality, food systems, and climate change. Vinmonopolet has the most gender targeted risk assessment. Orkla and Unil carry out risk assessments with regard to human rights of external stakeholders but do not mention gender explicitly. Bama-Gruppen and Nortura do not identify gender-related risks for external stakeholders. Moreover, Vinmonopolet is the only company that engages with external stakeholders on gender-related risks. Nortura launched a "broad consultation with stakeholders" in 2021 which continued in 2022, and Orkla and Unil engaged with civil society organisations and/ or local communities, which could possibly include engagement on gender-related risks. Finally, only Orkla and Vinmonopolet have a whistleblowing channel that external stakeholders can access to report (also) on gender-related concerns, but neither is gender-specific.

**Figure 8: Food/Agriculture sector scores by sphere of impact, 2022 vs 2023**





## Marine

### Austevoll Seafood, Cermaq Group, Lerøy Seafood Group, Mowi, Salmar

The marine sector is the second-best improver at the overall level, only outperformed by the agricultural sector. Figure 9 below shows clear improvements in all three spheres of impact. The main components of these changes are improved reporting that some companies published their first gender equality report in 2022, updated policies and improved human rights due diligence or materiality assessments. Lerøy Seafood Group, Austevoll Seafood and Salmar are all among the top ten improvers, across sectors and spheres of impact.

#### Own operations

Last year's SheDil Index report called for improvement in the marine sector, and it is encouraging to see the changes. All companies, except Cermaq Group, have a human rights and/or diversity/inclusion policy, Mowi also with concrete goals. Salmar published its first gender equality report in 2022 and is jointly with Mowi and Lerøy Seafood Group reporting on most parameters, including the gender pay gap, within its own operations. Cermaq reports on many parameters, but lacks info on parental leave and pay gap, while Austevoll Seafood's reporting is limited to the gender balance in the workforce and gender risks related to subsidiaries in Peru and Chile. Lastly, all companies are committed to increasing the proportion of women workers, Salmar is committed to equal pay, while both Lerøy Seafood Group and Mowi have identified specific targets in their efforts to promote gender equality.

#### Suppliers

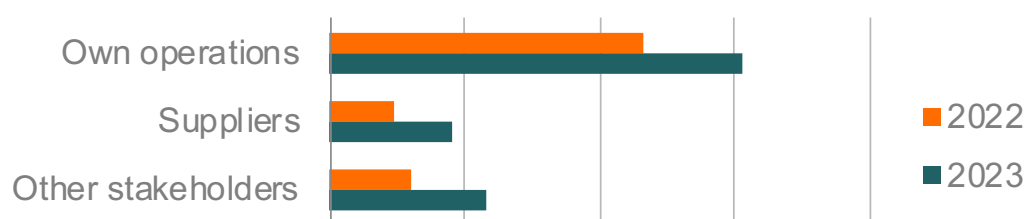
In spite of significant improvement from 2022, reflected in a doubling of the aggregated score, the marine sector still has a considerable untapped potential when it comes to fully applying the gender lens to its supply chain. While only two companies performed human rights due diligence according to the 2022 SheDil Index, all five companies now have a human rights due diligence, or materiality assessment, process in place for the supply chain, representing an important step forward. However, only Austevoll Seafood mentioned discrimination and sexual harassment as a risk, the other four companies have no reference to gender-specific issues. This is rather surprising given that women "...constitute half of the workforce in fisheries and aquaculture throughout the value chain, but they have less stable and lower-paid jobs".<sup>19</sup>

None of the companies collect gender-disaggregated information in the supply chain, nor on maternal rights. Lerøy Seafood took an initiative to, jointly with a key supplier, develop working wear with a design adapted to women, and was named "Marine company of the year" for this effort in 2022. The other four companies did not take or join any gender-related initiatives in 2022.

#### Other stakeholders

The marine sector needs to ensure the inclusion of other stakeholders, especially women in coastal communities who have the skills and experience to address climate change adaptation. Although there is a positive development in the companies' involvement of stakeholders, or their perspectives, in the due diligence approach, none of the five companies has identified gender-specific risks related to local communities or other external stakeholders. Except for Mowi all companies include human rights, which could include gender-related risks, in their due diligence, but none with an explicit gender lens. All companies engage with external stakeholders on a regular basis, but again with no specific reference to the gender perspective. Austevoll Seafood, Cermaq Group and Lerøy Seafood Group have all modified policies lately; Austevoll's daughter company Austral (Chile) opened their whistle-blowing channel for external stakeholders in 2022, Cermaq updated their policies on human rights and working conditions, while Lerøy adopted new policies for human rights and whistleblowing in 2022. All companies except Mowi have publicly available whistle-blowing channels, and Austevoll Seafood is the only company that mentions local communities explicitly as in relation to the whistleblowing mechanisms. None of the companies seem to have taken the gender perspective particularly into account in their complaint channels.

**Figure 9: Marine sector scores by sphere of impact, 2022 vs 2023**



19) <https://www.fao.org/gender/learning-center/thematic-areas/gender-in-fisheries-and-aquaculture/4/>

## Extractives/energy

### Aker BP, Equinor, Norsk Hydro, Scatec Solar, Yara International

Compared with the SheDil Index figures from 2022, we see that the main improvements are found regarding suppliers and other stakeholders, in part due to companies having joined efforts with industry peers and UN bodies in gender-related initiatives, as well as improved due diligence approaches. Although there have been only minor changes since 2022, the extractives / energy sector maintains its position as the best performing when it comes to own operations.

#### Own operations

All companies have a human rights and/or diversity and inclusion policy. As last year, Scatec Solar's Diversity and Inclusion Policy is particularly strong, as it includes clauses on recruitment and leadership development. Furthermore, Norsk Hydro has a Global Framework Agreement that includes equal remuneration for men and women for work of equal value, and Yara International has firmly anchored diversity and inclusion into its updated business strategy. Regarding reporting on gender equality, most companies report on most parameters in all their global operations. For example, Yara International reports on "Gender mix by region." Lastly, each company has a specific target for gender equality, and Aker BP, Equinor, and Yara International have gender equality targets for the Board of Directors, the New Corporate Executive Committee, and senior management, respectively. Additionally, Equinor has a gender equality target for graduate and apprentice recruitment, which improves employment opportunities for young women, and Yara International has an explicit goal of closing the gender pay gap.

#### Suppliers

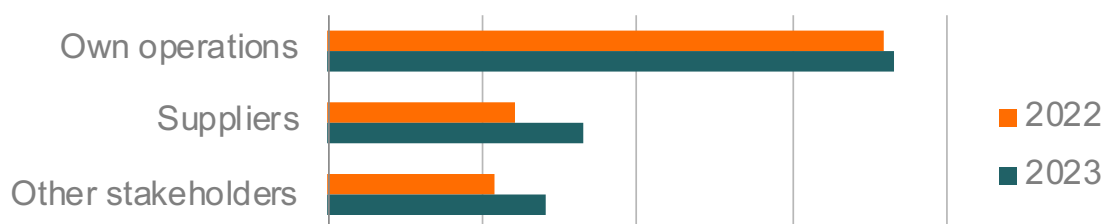
The extractives/energy sector has average supply chain due diligence practices but still needs improvement, as the sector relies on engines, turbines, as well as power transmission equipment manufacturers and other suppliers. While Equinor, Norsk Hydro, Scatec Solar, and Yara International's processes include human rights, Aker BP's speaks explicitly about that everyone should be treated with respect regardless of their gender etc. Additionally, all companies have a CoC for suppliers that mentions gender or human rights. That said, Equinor outperforms its peers, as it instructs suppliers to "pay special attention to

those most vulnerable to adverse human rights impacts, including women" and to respect that "women... have the right to a reasonable period of paid leave or leave with adequate social security benefits" in connection to childbirth. This shows that Equinor expects its suppliers to aim at abiding by Norwegian social protection laws. Regarding gender-related initiatives, Yara International's programme "Women in Agronomy" is noteworthy. This programme facilitates mentoring, networking, and visibility among new and experienced women agronomists to promote gender balance in this area of the supply chain. Yara International also has a Leadership Academy in India and Kenya; an innovative way to accommodate for local customs and culture and ensure female participation.

#### Other stakeholders

Given the potentially adverse effect of the extractives/ energy sector on the physical environment, this sphere is arguably the most significant. On the one hand, Equinor, Norsk Hydro, and Scatec Solar's materiality assessments include human rights and/or local community impact, which could include gender-related risks. On the other hand, neither Aker BP nor Yara International specifically identify risks for external stakeholders that could be gender related. Furthermore, every company engages with civil society, namely NGOs and trade unions, and/ or local communities, and this could include engagement on gender-related risks. Finally, many of the companies in the extractives/energy sector have grievance mechanisms for local communities. Yara International's CEO commitment stands out, as it consists of a pledge and networking efforts to drive change towards more diversity, equity, and inclusion, with a particular focus on ethnicity and gender.

**Figure 10: Extractives/Energy sector scores by sphere of impact, 2022 vs 2023**



## Garment/textiles

### Helly Hansen Group, Kid, Nor Tekstil, Princess, Varner Group

According to the International Labour Organisation, 80 percent of workers in the garment/textiles sector are women,<sup>20</sup> where the vast majority of them are in global supply chains. Paying attention to women's human rights is therefore crucial for this sector. As the figure below shows, there are improvements in all three areas when seeing all five companies in the garment and textile industry jointly. The largest improvements are found within own operations and in the relation to other stakeholders, which is noteworthy given that the sector scored lowest in both these areas among all sectors covered in the 2022 SheDil index.

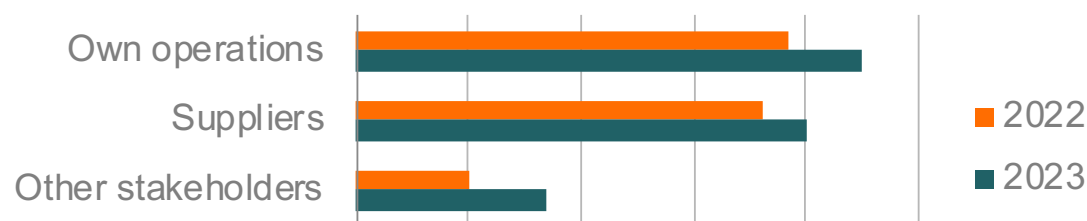
#### Own operations

In spite of some improvements from the 2022 index, the garment/textile sector is still scored at the bottom among the five sectors when it comes to own operations and none of the companies get a full score on any of the three indicators (see table 7). All five companies have CoCs that mention gender or non-discrimination, in addition, the Varner group describes itself as an equal opportunity employer, while NorTekstil and Kid are more elaborated in their policies and commitment to diversity and equality. As in 2022, Helly Hansen Group and Princess remain the only two companies among all 25 companies in this study that do not appear to report on gender equality within its own operations, and it is not clear if these companies have faced any consequences for their failure to abide by sections 25 and 26a of the Norwegian Equality and Anti-Discrimination Act. The other three companies report on most parameters, but none include both maternity leave, detailed workforce composition and gender pay gap. Kid reports on the gender pay gap but does not present gender-disaggregated information on parental leave, turn-over, nor part-time vs full-time positions. In contrast, NorTekstil have detailed info on workforce composition and parental leave, Varner Group also on part-time vs full-time position, but none of these report on the gender pay gap. Princess does not have a gender equality target, Helly Hansen has a goal of eliminating discrimination, including gender-based, while the other three have non-specific commitments for diversity and inclusion, equal opportunities, and more women in management positions.

#### Suppliers

There are only minor changes from 2022 to 2023 when it comes to how gender is integrated into the sector's supply chain management. While the garment/textile was clearly the best performing of all sectors in this sphere in 2022, both agriculture and the extractive/energy sectors are now at par with the textile companies in applying the ender lens in their supply chain management. There are still noticeable variations between the companies, with Varner Group and Kid scored among the four best companies regardless of sector, while the other three companies are ranked as 11 (Helly Hansen) and 12 (NorTekstil and Princess). Varner Group has the most thorough description of gender-specific risks. Both Kid and Varner Group have detailed description of gender-related risks in their supplier CoC and engage in specific efforts to promote and protect women workers in their supply chain; Kid with the Bokhari, a "...social enterprise that contributes to secure decent employment opportunities to hundreds of artisans in Pakistan, mostly women, through the production and sale of handmade textile and interior product", and Varner Group has initiated a new project promoting gender justice at three factories in Bangladesh, are engaged in a joint effort with two other international buying companies in addressing young women workers' human rights in India.

Figure 11: Garment/Textiles sector scores by sphere of impact, 2022 vs 2023



20) [https://www.ilo.org/asia/publications/WCMS\\_760374/lang--en/index.htm](https://www.ilo.org/asia/publications/WCMS_760374/lang--en/index.htm)

Although Princess screens suppliers, it is unclear whether this is part of a systematic human rights due diligence process that includes women's human rights. On the other end of the spectrum, Kid conducts a risk assessment of its supply chain that addresses "challenges related to... women's right to education," sexual and gender-based violence is identified as a prioritised area in the Varner Group's human rights due diligence. Each company has a CoC for suppliers or requires suppliers to sign its own CoC. Kid and Varner Group have the most thorough CoCs for suppliers, as they include parental protection (e.g., breastfeeding) and/or accommodation requirements (e.g., separate toilets). Helly Hansen Group and Varner Group are the only two of all 25 companies that have published gender-disaggregated data on the composition of the workforce in their supply chain.

#### **Other stakeholders**

The garment/textile remains at the bottom of the sectors in this sphere. While Varner Group and Kid's materiality assessments, or due diligence processes, include human rights and community engagement, neither is gender-specific. As for the other three, no risk assessments covering external stakeholders have been found. Conversely, each company except Princess engages with stakeholders in NGOs and/or the local community, which could include engagement on gender-related risks. In Princess' case, it is worth mentioning that 25% of their cotton are certified by the Better Cotton Initiative, which engages comprehensively with local communities and stakeholders on water usage related to cotton farming. Finally, none of the companies in this sector appear to have a whistleblowing channel that external stakeholders can access to report on gender-related concerns.



# Gender sensitivity in the Bangladeshi ready-made garment industry

By Heidi Furustøl, Executive Director, Ethical Trade Norway

Why is a gender sensitive workplace programme needed? The Ready-Made Garment sector (RMG) employs nearly 4.2 million workers and is a major formal employment sector for Bangladeshi women. The sector is vital to the economy and contributed 9.25% to GDP in 2022 and accounted for 81.82% of the country's total exports earning. Although women still make up more than half of all workers in the RMG sector, they continue to be overrepresented in lower-paid positions, with men holding most supervisory roles. Women run a high risk of being harassed by male colleagues and supervisors, and women are more likely to be bypassed when workplace rights and issues are discussed. They do often not have structures to turn to when it comes to grievances related to gender-based harassment and inequality. However, besides being a fundamental human right, research has demonstrated that gender equality leads to greater productivity.

Between 2021 and 2023, funded by NORAD and the Dutch government through STITCH, ETI UK, Ethical Trade Norway and ETI Bangladesh rolled out a gender sensitive workplace programme to promote women leadership and a culture of gender sensitivity in 19 factories. The aim of the programme is to contribute to a gender sensitive workplace where the standard of conduct and behaviour ensures that everyone is treated with dignity and respect. This in turn resulting in healthy industrial relations that contributes to improved productivity and sustainable growth. The trainings have covered all the workforce, including female and male workers as well as supervisors and management. Selected factory representatives from both management and workers have acted as resource persons for continued gender-sensitivity support within the factory. Key activities under this programme included capacity development and awareness-raising among workforce; institutionalisation of redressal mechanism for addressing gender-based violence including sexual harassment; advocacy with factory management for promoting women leadership; development of factory-based resource persons; facilitation of an online-based Sexual Harassment Complaint Committee (SHCC) network and advisory/technical support.

Outcomes of the project:

- Empowered female factory workers through increased knowledge and awareness of their rights. The share of female workers who heard about decent work increased from 68% to 99.5%; the percentage of female workers who know about their rights and responsibilities rose from 54% to 79.9%; and the percentage of female workers who share workplace issues with the worker participation committees (PC) went from 24% to 45.8%.
- Female representation across various positions within the factory, in particularly supervisors, has increased due to capacity building around gender equity. – 30% increase of women members of PC and SHCC committees and 6% increase in female supervisors.
- Factories have increased capacity to institutionalize safeguarding mechanisms against GBV and harassment in the workplace through strengthening SHCC. The share of female workers aware of sexual harassment-related issues, the existence of the SHCC in their factory and willingness to turn to the SHCC for help increased from 12 and 20% to 94% during the project.

**SheDiL**.org key check point:

Seek leverage:

***Cooperate with other actors to build and exert collective leverage, such as joint training programmes, collaborative approaches in industry associations, multi-stakeholder initiatives and government engagement and collective inspections.***

# Conclusions

This second edition of the SheDil Index reveals an **overall progress** across sectors and companies in their policies, reporting and materiality analysis on human rights in general. Three companies have made significant progress, while several others show notable progress when it comes to applying the gender lens. Not surprisingly, the Norwegian Transparency Act is referenced by several companies in their reporting. Within **own operations**, 80% of the companies report on several gender-equality parameters while 70% are found to have committed to at least one explicit target on gender. Based on both the 2018 Norwegian Equality and Anti-Discrimination Act and the Transparency Act from 2023, we expect the rest of the companies to take action so that all companies will qualify for top score in the near future.

As for **suppliers**, almost all companies across sectors perform some form of human rights due diligence in the supply chain but only three with an explicit and well-described gender risk. Still, this is an improvement from last year. The study also shows that four companies have included some more details on gender in their CoC, but the vast majority still rely on a CoC for suppliers that mentions gender and/or related principles, such as non-discrimination without addressing additional risks for women workers. The same two companies as in 2022 collect and report on gender-disaggregated information about the workforce, while only one company (none in 2022) reports on maternal rights, childcare, and/or sanitary facilities, and ten companies, up from only six companies are part of gender-related initiatives or are part of joint efforts to promote and/or protect women workers. It could very well be that more companies collect data on gender-related issues in their supply chain without publishing these, if that is the case, these companies are recommended to at least share information about what kind of data they collect, which would be one way of contributing to more awareness and attention around the situation for women workers.

Regarding external stakeholders, around half the companies have a regular materiality analysis and engages with external stakeholders on human rights related risks. However, only a very limited number includes a gender-specific lens in these efforts, at least in their public information on the issues, constituting a major shortcoming given the known risks to women in communities in the value chains of the assessed sectors. There are positive trends in update of policies, including five companies that have revised and/or established new policies with specific gender clauses. Eight of the companies have no publicly available whistle-blowing mechanism for external stakeholders, and none are reporting to have been engaged in gender-specific remediation processes. Thus, although some important steps have been taken, there is still a considerable room for improvement for the vast majority of the companies when it comes to fully integrating the gender lens to their human rights policies and practices. This is particularly true for the companies' supply chain and regarding impacts on and engagement with external stakeholders.

The key checkpoints outlined in the SheDil tool for gender-responsive due diligence are highly relevant in identifying critical issues and indicating possible steps to address these. Doing so would better enable companies to meet their responsibility to protect human rights under the UNGP, help meet SDGs 5 and 8 by 2030 and to comply with the Norwegian Transparency Act as well as the EU CSDDD.



**Assess  
your company's  
performance on the  
gender dimension of  
human rights due  
diligence today  
at shedil.org.**