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Norwegian private sector investments  
in war-torn Ukraine:

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# How to manage risks to women

# Preface

“Norway and Norwegian businesses wish to contribute significantly to Ukraine’s struggle for freedom here and now, and to rebuild the country after the war is over.”

That was the main message from the Norwegian Minister of Trade and Industry, Cecilie Myrseth, during a visit to Kyiv in September 2024. She was travelling with a Norwegian business delegation to enhance trade cooperation and facilitate increased support from the private sector.

And the need for foreign support and investment in Ukraine is huge.

So is the interest: Norad received over 70 applications for the Support for Enterprise Development for Ukraine call.

Based on previous work on the business and human rights agenda, FOKUS – Forum for Women and Development wanted to take a closer look at how businesses can prevent and mitigate risks to women’s human rights when operating in Ukraine.

Master student in the theory and practice of Human Rights, Julia Broniszewska, was tasked to do so as part of her internship with us in the fall 2024. She embarked on the task with great enthusiasm, resulting in this paper, mapping out the obligations, challenges and opportunities for Norwegian enterprises.

As far as we have been able to detect, the only one in its kind. We hope that it can be the foundation of more tailor-made recommendations for the Ukrainian context.

We are most grateful to Julia for her work and interest in this field, and proud to present the paper she has written for us. We also want to thank all those who took the time to inform the work.

Sylvi Bratten  
Executive Director

# Executive summary

Reconstruction of war-torn countries is a complex process that extends beyond immediate humanitarian aid and peacekeeping efforts. Businesses play a crucial role in the reconstruction phase by investing in infrastructure, creating jobs, fostering inclusive economic growth and providing essential goods and services. However, their involvement comes with both benefits and risks for themselves, employees and the local population. Conflict zones present a unique set of challenges, including weakened governance, legal instability, and heightened risks of exploitation, particularly for marginalised groups such as women, displaced individuals, and ethnic minorities. In this context, businesses are expected to conduct heightened human rights due diligence (hHRDD) to identify, prevent, and address risks related to their operations, supply chains, and partnerships<sup>1</sup>. This includes assessing their impact on conflict dynamics, such as the risk of contributing to forced labour, human trafficking, or gender-based violence.

It is imperative to understand that women in these regions often face serious risks, including gender-based violence, economic marginalisation, and social exclusion. In these contexts, the risk of businesses becoming implicated in serious human rights abuses is exceptionally high. Implementing international standards offers businesses an opportunity to play a positive role in a just and sustainable recovery. Business is never a neutral actor in conflict-affected settings.<sup>2</sup> Even if it doesn't take a side in a conflict, its operations – including the decision to stay or exit – influence conflict dynamics. Understanding these dynamics and obligations under human rights law is crucial for businesses to operate responsibly and contribute positively to sustainable peace and development.

Gathering comprehensive data on the impact of businesses on women's human rights in conflict-affected areas like Ukraine has proven to be a significant challenge. This issue is not limited to any specific organisation or company but reflects a broader, partial understanding of obligations under international law. The lack of data highlights the urgent need for practical tools to help companies adopt gender-responsive and conflict-sensitive due diligence practices effectively. Recognising the shortage of existing information, this report aims to serve as a blueprint and aims to fill that gap by:

- **Building on the existing theoretical framework:** - Integrating a gender perspective within conflict contexts to link business operations to human rights considerations.
- **Assessing the impact on Women's Rights:** Evaluating how businesses influence women's rights – both positively and negatively—in areas such as employment practices, workplace policies, supply chains, and community engagement.
- **Offering practical guidance:** Presenting actionable recommendations, tools, and metrics that businesses can follow and implement to enhance gender equality and operate with conflict sensitivity.

By achieving these objectives, the report seeks to be a valuable resource for Norwegian businesses. It provides insights and practical steps to not only ensure responsible and ethical operations but also to contribute positively to the advancement of women's rights in Ukraine's complex, conflict-affected environment.

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1) UN Working Group on Transnational Corporations, Business, human rights and conflict-affected regions: towards heightened action  
 2) UN Working Group on Transnational Corporations, Business, human rights and conflict-affected regions: towards heightened action

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## Abbreviations

<b>FOKUS</b>	Forum for Women and Development
<b>RBC</b>	Responsible Business Conduct
<b>HRDD</b>	Human Rights Due Diligence
<b>hHRDD</b>	heightened Human Rights Due Diligence
<b>CEDAW</b>	Convention on Elimination
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>GBV</b>	Gender-Based Violence
<b>UN</b>	United Nations
<b>UNGP</b>	United Nations Guiding Principles on Business and Human Rights

# Introduction

The ongoing war in Ukraine and the damage to the key infrastructure has created an urgent need for foreign investments in a way that promotes sustainable and just recovery. By investing and operating in conflict zones, international businesses, including those from Norway, carry significant potential to influence the trajectory of human rights, including women's rights.

In conflict-affected regions, women bear a disproportionate burden of instability, facing heightened risks of gender-based violence, economic marginalisation, and social exclusion. Yet, women are also critical agents of recovery, often stepping into leadership roles within their families, communities, and workplaces. Understanding the unique challenges and opportunities for women in this context is essential for businesses aiming to contribute positively to Ukraine's reconstruction. Without careful consideration of gender equality and adherence to international human rights standards, private-sector investments risk perpetuating existing inequalities and exacerbating vulnerabilities.

This paper uses a human rights law framework grounded in the principles of the UN Guiding Principles on Business and Human Rights (UNGPR), the OECD Guidelines for Multinational Enterprises (MEN), and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) as its theoretical background. These frameworks outline businesses' obligations to respect and promote women's rights and proclaim the need for heightened due diligence in conflict-affected areas.

The underlying approach of this analysis is intersectionality, which recognises that women in Ukraine are not a homogenous group and do not experience the effects of conflict in the same way. This framework enables a deeper understanding of how private sector investments may either reinforce or mitigate existing inequalities, particularly among marginalised groups of women, such as ethnic minorities and displaced populations.

By incorporating gender-responsive and conflict-sensitive approaches, businesses can mitigate risks and actively contribute to women's empowerment and the broader goals of sustainable development and peacebuilding in Ukraine. This report highlights the importance of heightened due diligence in conflict zones, the necessity of addressing intersectional discrimination, and the imperative for businesses to actively promote gender equality in their operations.

Norwegian businesses in the energy sector are set to play a pivotal role in Ukraine's recovery due to their expertise, resources, and alignment with Ukraine's urgent needs for energy security and sustainable development<sup>3</sup>. It is reflected in Norway's co-chairing energy security segment of the Ukraine Peace Formula.<sup>4</sup> The ongoing conflict has severely disrupted Ukraine's energy infrastructure, with widespread destruction of power plants, grids, and critical energy facilities<sup>5</sup>. This has left millions without reliable access to electricity, heating, and essential services, particularly during harsh winters.

Norway is, as a global leader in renewable energy, oil and gas exploration, and energy innovation, well-positioned to contribute to rebuilding and modernising Ukraine's energy systems. Norwegian companies bring advanced technologies and expertise in renewable energy development, such as wind, solar, and hydropower, which align with Ukraine's long-term goals of reducing reliance on fossil fuels and achieving greater energy independence<sup>6</sup>. Despite the critical importance of such considerations for Norwegian businesses operating in Ukraine and other conflict-affected areas, there is a notable scarcity of practical information and guidance for Norwegian businesses operating in Ukraine and other conflict-affected areas. While organisations such as NORAD and enterprises have provided some data, there remains a need for more comprehensive support to effectively assess and mitigate potential human rights risks. This gap underscores the need for practical tools and frameworks that can guide businesses in responsibly navigating this complex landscape.

By addressing these issues, the paper contributes to the broader discourse on Responsible Business Conduct in conflict-affected areas and highlights the potential for companies to foster positive change. It serves as a valuable resource for businesses seeking to align with international standards and for stakeholders advocating for the protection and advancement of women's rights.

3) Norwegian-Ukrainian Chamber of Commerce (NUCC). "Rebuild Ukraine 2024."

4) Office of the Prime Minister, "Summit on Peace in Ukraine,"

5) Clingendael Institute. *EU-Ukraine Energy Cooperation: Priorities for Resilience and Green Transition*.

6) Ministry of Economy of Ukraine. "Ukraine Has Presented the Report on the Decarbonization of the Energy Sector by 2050 (...)"

# Theoretical Background

## How does Business fit into the human rights framework?

Business is a significant contributor to global economic growth and an ever-present actor in all areas of human life. Although human rights mechanisms primarily and directly concern states, the United Nations Human Rights Council emphasises that corporations have a responsibility to respect human rights. Businesses' actions have a substantial impact on communities. Enterprises can affect the human rights of their employees, local communities within which they operate, their customers, workers in supply chains, and communities around the world (the list is not exclusive).

Directly, indirectly or virtually, they impact many human rights. In perspective, when an employer discriminates against an employee on the grounds of race, sex, gender, age, and others, they infringe upon the right to freedom from discrimination. An increasing number of companies are demonstrating their respect for human rights by working to embed international human rights standards within

their core business practices. There is growing evidence that good human rights practices enhance a company's reputation and the ability to attract and retain the best employees, create more stable operating environments and strengthen a company's position by giving improved access to markets, consumers and investors.

The promotion and protection of women's rights in conflict-affected areas like Ukraine are governed by a robust body of international human rights law. Compliance with these frameworks is crucial for private sector enterprises to ensure that their operations do not exacerbate vulnerabilities or perpetuate inequalities, particularly in a context where women's rights and labour protections are weakened. This section links CEDAW to business and outlines the key international frameworks that guide corporate behaviour and establish standards for protecting women's rights in the private sector: the UN Guiding Principles on Business and Human Rights (UNGPR), and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (MEN).



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

7) United Nations Human Rights Council (UNHRC). *Resolution 8/7: Mandate of the Special Representative on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises*.  
8) United Nations. *How Can Businesses Impact Human Rights?*  
9) United Nations. *UN Guiding Principles Reporting Framework Investor Statement*.  
10) United Nations Human Rights. *Human Rights Translated: A Business Reference Guide*.

## OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

The Guidelines are recommendations addressed by governments to multinational enterprises to prevent and address adverse impacts associated with business activities on people, the planet and society<sup>11</sup>. They aim to enhance business contribution to sustainable development in countries where the business operates<sup>12</sup>. The framework is supported by the

National Contact Points for Responsible Business Conduct (NCPs). These can guide and enable enterprises engaged in conflict-affected areas to act in a more responsible way. Safeguarding jobs, economic activity, and essential goods while considering the enormous strain under which Ukrainian workers and supply chains operate.<sup>13</sup>

In conflicts where one state is at war against another, business needs to exercise heightened human rights due diligence with regard to its activities, products and services in BOTH states using the three fundamental questions identified by the OECD<sup>14</sup> to assess potential negative impact:

- Is there an actual or potential adverse impact on human rights or is the conflict connected either to the company's activities (actions or omissions), products or services in any of the state parties to the conflict?

- If so, do the company's activities in any of the state parties to the conflict increase the risk of that impact?

- If so, would the company's activities in any of the state parties to the conflict in and of themselves be sufficient to result in that impact?

If the answer to all three questions is "yes," then the business causes, or may cause, an adverse human rights impact and is expected to take appropriate measures to cease or, prevent, and remedy the impact.<sup>15</sup>

## UN Guiding Principles on Business and Human Rights

The UNGP, endorsed by the United Nations in 2011, provides a comprehensive framework for businesses to respect human rights in their operations. UNGP has become the global standard for corporate behaviour. The Principles explicitly call for gender-sensitive human rights due diligence, urging companies to identify and address the differentiated impacts their operations may have on women. This approach is particularly relevant in conflict-affected areas, where women face heightened risks of violence, exploitation, and marginalisation.

Situations that pose significant risks to people impacted by a business's activities are often the same situations that carry risks for the company itself.<sup>16</sup>

**«Businesses are not neutral actors; their presence is not without impact. Even if business does not take a side in the conflict, the impact of their operations will necessarily influence conflict dynamics.»**

UN Working Group on Transnational Corporations, Business, human rights and conflict-affected regions: towards heightened action

11) OECD (2023) *Guidelines for Multinational Enterprises on Responsible Business Conduct*.

12) OECD (2023) *Guidelines for Multinational Enterprises on Responsible Business Conduct*.

13) OECD. *Responsible Business Conduct: Implications of Russia's Invasion of Ukraine*.

14) <https://media.business-humanrights.org/media/documents/files/documents/Debevoise-Enodo-Practical-Meaning-of-Involvement-Draft-2017-02-09.pdf>

15) United Nations Development Programme. *Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide*.

16) Shift Project. *Human Rights Due Diligence in High Risk Circumstances*.





Foto: Bianca Otero / ZUMA Press Wire / Shutterstock / NTB

## Intersectionality and Its Relevance in Ukraine's Context

As a consequence of the war between Ukraine and Russia, women in Ukraine face an array of challenges linked to widespread violence, economic instability, and an increased risk of exploitation and human trafficking. However, the impacts of these challenges are not uniform across all women. The theory of intersectionality, introduced by Kimberlé Crenshaw, provides a critical framework to understand how multiple social identities – such as gender, ethnicity, socio-economic status, and geographic location – intersect to create unique experiences of discrimination and vulnerability.<sup>17</sup> Intersectionality challenges the notion that all women experience inequality in the same way. Rather, it recognises that overlapping and intersecting identities, relationships, and social factors shape individual experiences.

In the context of Ukraine, factors such as marital status, ethnicity, socioeconomic status, sexual orientation, dis-

ability, regional location, age, education level and more all contribute to how women experience the consequences of the ongoing conflict and economic instability.<sup>18</sup> Women in marginalised or minority groups, for example, may experience heightened risks and reduced access to resources compared to other women. This concept is particularly important when analysing private sector investments in Ukraine and their effects on women's rights and equality.

In conflict-torn Ukraine, where women now constitute a majority of the workforce, it is crucial to recognise that not all women have equal access to opportunities.

- **Rural vs. Urban Disparities:** Women in rural areas are more likely to experience poverty and limited access to education, training and formal employment opportunities. This geographic disadvantage compounds other vulnerabilities, such as lack of education and fewer social safety nets, which leaves rural women more susceptible to exploitative labour conditions and human trafficking.

17) Kimberlé W. Crenshaw, *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics*

18) UN Women. *Impact of War in Ukraine on Women*.



- **Ethnic Minorities:** Ethnic minority women, such as those from Roma communities, face compounded challenges. Discriminatory practices in hiring, limited access to education, and social stigma leave them more vulnerable to informal work arrangements, where they lack protections and are at a greater risk of abuse.
- **LGBTQIA+:** In conflict-affected regions, LGBTQIA+ individuals face heightened risks of discrimination, violence, and exploitation, particularly in conservative or unstable environments. Businesses can address these challenges by implementing explicit non-discrimination policies, fostering inclusive workplaces through sensitivity training, and ensuring access to healthcare benefits that respect diverse identities. Partnering with local LGBTQIA+ organisations can also help businesses better understand and respond to the specific needs of this community, promoting safety and equality in their operations.

For companies operating in conflict-affected regions like Ukraine, an intersectional approach is essential to meet their heightened due diligence obligations. Businesses must recognise that risks to women's rights and equality are not uniform and are shaped by the intersecting identities of those affected by their operations.

Intersectionality is a powerful tool for understanding the complex realities facing women in conflict-affected Ukraine. Private sector investments, guided by international human rights standards, must take into account the overlapping and intersecting identities of women to avoid deepening inequalities. A business or investment that does not consider intersectionality risks perpetuating or even exacerbating the vulnerabilities faced by the most marginalised groups. By adopting an intersectional approach, businesses and governments can better safeguard women's rights and contribute to meaningful gender equality in Ukraine.

## Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

While CEDAW is primarily a legally binding instrument for states, its principles have far-reaching implications for

the private sector, particularly in conflict and post-conflict settings. The CEDAW Convention, to which Norway is a party, outlines the obligations of states and, indirectly, other actors, including businesses, to eliminate discrimination against women and promote gender equality in all areas of life.<sup>19</sup> These obligations extend to regulating private actors, ensuring their practices align with international standards.

For example, in *R.K.B. v. Turkey*<sup>20</sup>, a female employee was dismissed based on unsubstantiated claims of “unethical behaviour” rooted in gender stereotypes. The CEDAW Committee found that Turkey had failed to safeguard against gender-based discrimination in private-sector employment. This serves as a cautionary example for businesses: discriminatory termination practices or reliance on stereotypes can lead to serious rights violations. Similarly, in *D.S. v. Slovakia*<sup>21</sup>, a mother returning from maternity leave was dismissed due to assumptions about her caregiving responsibilities. This case underscores the need for businesses to avoid decisions based on gendered assumptions and biases, which can be challenged as discriminatory under CEDAW.

In *Svetlana Medvedeva v. Russian Federation*<sup>22</sup>, labour laws excluding women from certain deemed hazardous roles revealed systemic discrimination. The case demonstrated that businesses must proactively create safe working environments for all genders rather than exclude women based on stereotypes. Failure to do so not only violates women's right to work but also undermines broader equality goals.

The Convention requires states to regulate the activities of domestic non-state actors who operate extraterritorially. States are responsible for controlling acts of national corporations operating in other countries to prevent and eliminate discrimination against women and promote gender equality.<sup>23</sup> For instance, when private sector investments fail to address gendered vulnerabilities, as seen in these cases, states must intervene to align business practices with international human rights obligations. By integrating CEDAW principles, businesses can ensure that women benefit equally from investments, particularly in post-conflict reconstruction efforts, and avoid perpetuating gender inequalities. These examples demonstrate why it is essential to place the protection of women's rights at the centre of private sector operations.

19) CEDAW Article 2(e)

20) CEDAW/C/51/D/28/2010

21) CEDAW/C/65/D/66/2014

22) CEDAW/C/63/D/60/2013

23) CEDAW. *General Recommendation No. 30 on Women in Conflict Prevention, Conflict and Post-Conflict Situations*.

# Contextual Understanding of Gender Equality and Conflict Dynamics

The ongoing conflict in Ukraine has profoundly disrupted the lives of millions, with hostilities affecting numerous regions across the country. Characterised by military engagements, territorial disputes, and political tensions, the conflict has led to widespread destruction of infrastructure, displacement of populations, and a breakdown of essential services.

The humanitarian impact is extensive, with a significant portion of the population requiring immediate assistance. Women and girls are particularly at risk during humanitarian crises as they still face disproportionate discrimination due to gender norms and gender-based violence.<sup>24</sup> The erosion of social structures and safety nets has exacerbated vulnerabilities, leaving women and girls more susceptible to exploitation and abuse.



Foto: Visar Kryeziu / AP Photos / NTB

## Gender-Specific risks in Ukraine, that companies ought to pay particular attention to:

- I. **7.1 million<sup>25</sup> people have been internally displaced within Ukraine, including 3,7 million women and girls<sup>26</sup> who need:**
  - a) Medical and psychological care
  - b) Employment opportunities
  - c) Child care
  - d) Safe accommodation
  - e) Protection from sexual and gender-based violence

## Approximately 80,000<sup>27</sup> pregnant women in Ukraine lack adequate access to:

- a) Sexual and reproductive health services
- b) Related rights and support

Access to healthcare, education, and employment opportunities has been severely restricted for many women. As primary caregivers, they often bear the dual burden of caring for their families amid scarcity and instability while also seeking ways to secure livelihoods in a disrupted economy. The increase in internally displaced persons, of whom women constitute a large percentage, further amplifies these challenges. Understanding the specific

hardships faced by women in conflict-affected regions is crucial for businesses operating in these areas. They have a significant role to play by ensuring their practices do not have negative impact on women, but instead contribute positively to the well-being and empowerment of women during and after the conflict.

24) Trends Research. *Shattered Lives: The Impact of the Ukraine Conflict on Women and Girls—Displacement, Healthcare, and Economic Security.*

25) International Organization for Migration (IOM). "7.1 Million People Displaced by War in Ukraine: IOM Survey."

26) UN Women. "Women and Girls after Two Years of War in Ukraine."

27) United Nations Population Fund (UNFPA). *Updated Appeal for Public Donors.*

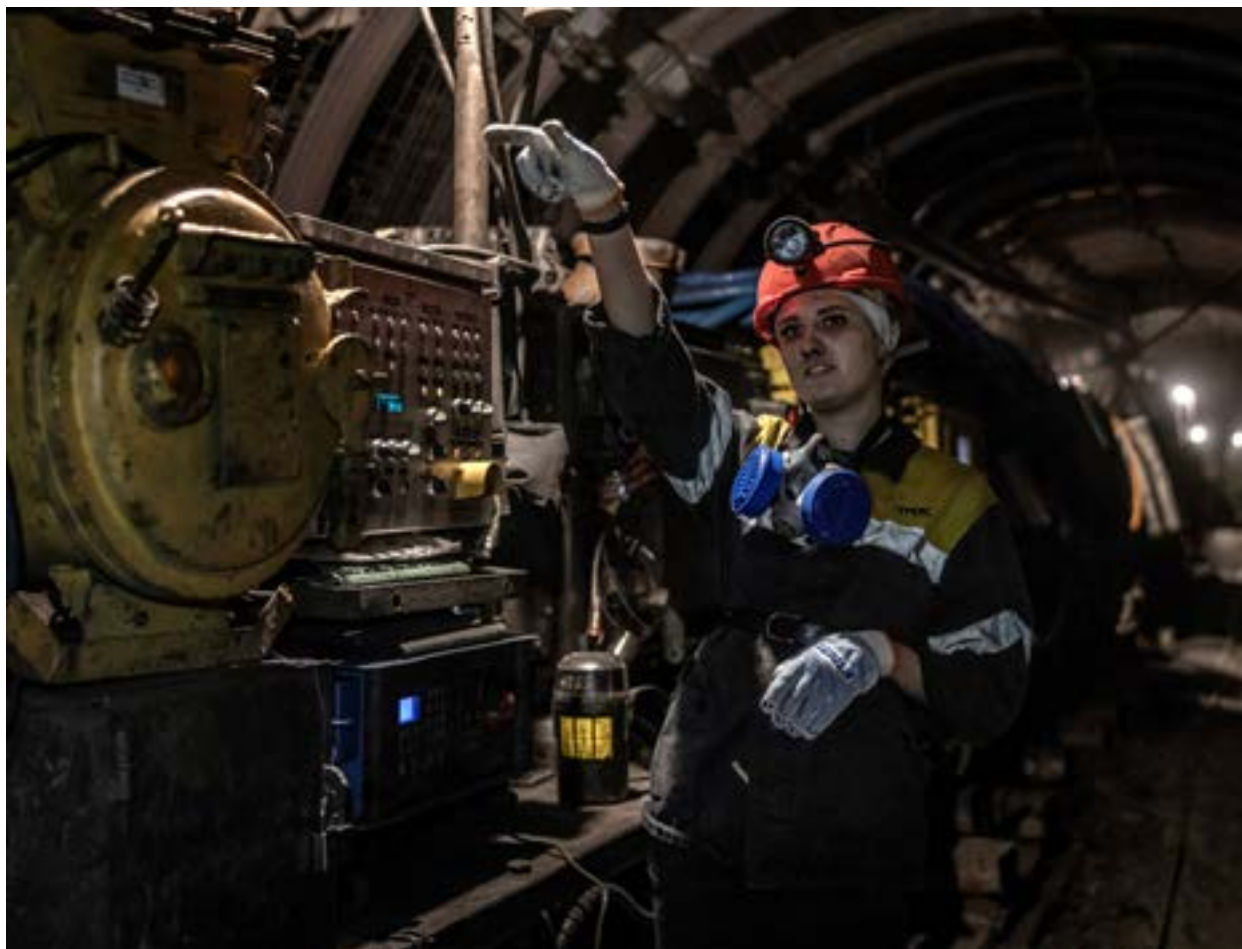


Foto: Finbarr O'Reilly / NYT / NTB

## Gender-Specific Impacts

### II. Mass displacements create conditions for a surge in human trafficking<sup>28</sup>, posing risks to:

- Refugees, especially women and unaccompanied children
- Individuals exploited by traffickers posing as transport providers

UNODC research shows that inside an affected country, vulnerabilities to trafficking in persons arise from the impacts of conflict: lack of income-generation opportunities, interruption in the provision of essential services, issues with the rule of law, internal displacement, and the risk of exploitation in armed conflict. People living in

conflict zones may adopt negative coping strategies to gain access to food and other supplies, or for their own safety and security.<sup>29</sup>

Special attention is required for refugee women facing intersectional discrimination, including Roma women, Black Women, Stateless Women, Women with disabilities, Migrant Women, Women of different ethnicities, LGBTIQ+ individuals, including transgender women whose identities may not be recognised. The war exacerbates existing inequalities, deeply impacting women who face intersectional discrimination.

28) United Nations Office on Drugs and Crime (UNODC). *Toolkit to Combat Trafficking in Persons*.

29) United Nations Office on Drugs and Crime (UNODC). *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*.



### III. Many women remain in Ukraine<sup>30</sup>, contributing by:

- Joining the armed forces
- Providing non-combat support and essential logistics
- Assisting in civilian evacuations
- Working in critical infrastructure
- Most Ukrainian households now rely on women amid severe shortages of food, water, and energy.

Women are not passive bystanders or only victims or targets in armed conflicts. They have historically had and continue to have many important roles, such as part of organised civil society, human rights defenders, labour force, active agents in peacebuilding and recovery processes and combatants. Additionally, women are primary bearers of the caregiving duty. Recognising women's role in conflict is a crucial step in building anti-discrimination and gender equality policies and guidelines. However, conflicts exacerbate violence against women and girls and gender-based discrimination as well as heighten economic insecurity and loss of livelihoods. Business activities can compound these issues by further perpetuating violence, contributing to displacement, and undermining access to already-scarce resources. Inside Ukraine, access to

income generation and to essential services and goods, including food, water, heating and electricity, is further deteriorating.<sup>31</sup>

Conflict heightens women's lack of access to and management of land and other natural resources critical to their livelihoods. Security that businesses use may cause violations too. In addition, the lack of gender and work-life balance sensitivity make business decisions during wartime more burdensome for women and for people with family responsibilities.

The challenges faced by women, i.e. navigating the dual burdens of caregiving and economic instability in conflict-affected areas in conflict-affected regions like Ukraine, are further compounded by the evolving legal landscape. In times of armed conflict, labour laws often undergo significant changes to address immediate needs, but these adaptations can inadvertently weaken protections for workers, particularly women. Understanding the current state of labour laws in Ukraine is crucial for businesses to navigate in this complex environment and to avoid worsening the situation.



Conference on *Restoring the rights of victims of conflict-related sexual violence: an element of peace and global security* in Kyiv, March 4, 2024.

28) United Nations Office on Drugs and Crime (UNODC). *Toolkit to Combat Trafficking in Persons*.

29) United Nations Office on Drugs and Crime (UNODC). *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*.

30) UN Women. "In the Ukraine War, Women Are on the Front Lines and Leading Recovery."

31) United Nations Office on Drugs and Crime (UNODC). *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*.

## Labour laws status in the time of armed conflict<sup>32</sup>

In conflict-affected regions like Ukraine, where women now constitute the majority of the workforce and face increased risks of exploitation due to weakened labour laws, it is essential for private-sector companies to implement comprehensive measures that promote gender equality. Private enterprises operating, for example, under the Nansen Programme, have a significant role to play in ensuring that women are provided with equal opportunities, fair wages, and safe working conditions. In Ukraine, where traditional gender roles have been further disrupted by the conflict, it is crucial that companies adopt proactive policies that focus on empowering women in both entry-level and leadership roles.

For companies operating in Ukraine, the responsibility to provide safe working conditions is especially pressing. Ensuring safe and inclusive workplaces is not only a legal obligation under national law and international human rights frameworks but also a crucial factor in empowering women economically. Private sector companies have a crucial role in promoting gender equality and ensuring that women are treated fairly and equitably in the workplace. By providing equal opportunities, fair wages, and safe working conditions, businesses can help reduce the gender disparities exacerbated by conflict. Furthermore, strong corporate accountability mechanisms, including grievance mechanisms and transparent reporting, are necessary to ensure that these rights are upheld.

Since the onset of the conflict, the implementation of Martial Law in Ukraine has significantly altered labour legislation, leading to weakened protections for workers. Ukrainian companies and employees have been severely impacted by the war, operating under immense strain due to fatalities, injuries, displacement, destruction of infrastructure, logistical disruptions, and a decline in domestic demand.<sup>33</sup> In response to these challenges, the Law on Labour Relations under Martial Law, introduced in 2022, has introduced substantial changes that increase flexibility in employer-employee relations.

### Key Changes and Potential Human Rights Implications:<sup>34</sup>

- **Increased Work Hours:** The maximum allowable

working hours per week have been extended from 40 to 60 hours. This significant increase raises concerns about worker fatigue and health risks, potentially infringing on the right to just and favourable working conditions as stipulated in international human rights standards and has particularly negative effects on women as care-takers.

- **Simplified Employment Termination:** Employers now have the authority to dismiss employees during periods of incapacity or leave (excluding maternity leave), and dismissals related to war-induced destruction of businesses have been streamlined. This could lead to job insecurity and may violate workers' rights to protection against arbitrary dismissal.

- **Suspension of Employment Agreements:** Employers may suspend employment agreements due to the inability to perform work because of military aggression. During such suspensions, salary payments are expected to be reimbursed by the aggressor state, introducing uncertainty regarding income security and potentially leaving employees without essential financial support.

- **Relaxed Leave Regulations:** Employers have the discretion to limit or deny employee leave, with unused leave being carried forward based on the employer's decisions during martial law. This could affect workers' rights to rest and leisure, impacting their overall well-being and hindering particularly women in their care-taking role<sup>35</sup>

These legislative adjustments, while intended to address the immediate needs of a nation at war, may inadvertently increase the risk of human rights abuses by eroding labour protections. The extended working hours, ease of terminating employment, and restricted access to leave can expose workers to exploitative practices and undermine their fundamental rights. The evolving labour laws in Ukraine highlight the importance of robust due diligence processes. Businesses operating under these laws must not only comply with legal standards but also go beyond compliance to address the heightened risks of exploitation and discrimination. This is where heightened human rights due diligence becomes indispensable, enabling companies to align their practices with international human rights norms. By doing so, businesses can contribute positively to the economy while upholding the dignity and rights of individuals affected by the conflict.

32) Martial Law will apply at least until February 2025 but likely longer: RBC Ukraine. "Zelenskyy Proposes to Extend Mobilization and Martial Law."

33) OECD. *Responsible Business Conduct: Implications of Russia's Invasion of Ukraine*.

34) PwC Ukraine. "The Law on Organisation of Labour Relations under Martial Law Came into Force."

35) Ibid.

## Human Rights Due Diligence

In conflict-affected countries like Ukraine, businesses are expected to conduct conflict-sensitive heightened due diligence to identify, prevent, and mitigate risks related to human rights abuses. Although the Guiding Principles do not explicitly distinguish between different types of due diligence, they are built around a concept of proportionality.

Heightened Human Rights Due Diligence is an enhanced process that businesses undertake when operating in high-risk contexts, such as conflict-affected areas or regions with weak governance and elevated human rights risks. While standard HRDD involves identifying, preventing, mitigating, and accounting for how a company addresses its impacts on human rights, heightened HRDD requires

a more rigorous, context-specific, and proactive approach due to the increased likelihood of contributing to violence and the severity of human rights abuses. It is not a separate obligation under the human rights framework. Nor is it a different type of due diligence. Rather, it is heightened action that derives from the principle of proportionality.

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## The higher the risk = The more complex the process

Because the risk of perpetrating gross human rights abuses is heightened in conflict-affected areas<sup>36</sup>, due diligence should be heightened accordingly<sup>37</sup>. One part includes business-specific considerations like access to export credit, investment approvals, and investment finance to demonstrate heightened human rights due diligence<sup>38</sup>. The other part comprises assessing how their operations might impact women's rights, particularly with regard to issues like labour exploitation, gender-based violence, and human trafficking.

The Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide<sup>39</sup>, developed by the UNDP, serves as a foundational tool for our report's section on heightened human rights due diligence (hHRDD). As the probably most comprehensive guide of its kind, it provides businesses with practical methodologies to identify, prevent, and address human rights risks in conflict-affected settings. By leveraging this resource, our report builds on its insights to tailor recommendations for gender-responsive and conflict-sensitive HRDD in Ukraine's unique context.

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36) UNGP Principle 7

37) United Nations Development Programme. *Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide*.

38) United Nations. *The Business, Human Rights and Conflict-Affected Regions Project*.

39) United Nations Development Programme. *Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts: A Guide*.



## Why is it Important to Conduct Heightened Human Rights Due Diligence?

- **Preventing human rights abuses and to be able to select the right measures to manage risks**<sup>40</sup>
- **Reach legal compliance and conduct risk management:** Proactively addressing risks minimises the potential for legal action against the company.<sup>41</sup>
- **Protecting Company Reputation:** Companies associated with human rights abuses can suffer significant reputational damage, affecting relationships with stakeholders and customers. Demonstrating a commitment to human rights can enhance investor relations and access to capital as well as a means to attract and keep employees.<sup>42</sup>
- **Ensuring Operational Stability:** Human rights abuses can lead to protests, strikes, or community opposition, disrupting business operations. Protecting the rights and well-being of employees and local communities contributes to a safer operating environment.<sup>43</sup>
- **Being Ethically Responsible:** Respecting human rights is a fundamental ethical obligation and aligns with principles of responsible business conduct. Businesses have a responsibility to respect human rights and ensure that they do not cause, contribute to or are linked to serious human rights violations.<sup>44</sup>
- **Contributing to Peace and Development:** Responsible business practices can support peacebuilding efforts and promote social cohesion.<sup>45</sup> Contributing to the SDGs enhances longterm prospects for both the company and the community.<sup>44</sup>

Because the risk of gross human rights violations is much higher in conflict-affected contexts, companies should approach due diligence with more care and attention by wearing gender and conflict-sensitive lenses while conducting due diligence. Business should assess not only the actual and potential human rights violations but also their impacts on conflict dynamics. Business in conflict-affected areas is never neutral. As mentioned above, its activities may cause or contribute to adverse impact on conflict even if it doesn't directly take sides in the conflict.

During the armed conflict, where the human rights regime cannot be expected to function effectively, the risk of involvement in human rights violations emerges. Operating in conflict zones, responsible businesses would seek guidance about how to avoid harming the population and fuelling the conflict. Innovative and practical approaches based on gender-sensitive assessment are crucial to avoid the risk of perpetrating human rights violations and the risk to the company.

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40) Office of the High Commissioner for Human Rights (OHCHR). *Report of the Special Representative on Human Rights and Transnational Corporations and Other Business Enterprises*. para 86.

41) *Ibid.* para 74

42) *Ibid.* para 63

43) *Ibid.* paras 69 and 70

44) Tumurtogoo, Ariunaa. "Why Should Businesses Respect Human Rights?" *United Nations Development Programme*.

45) Fort, Timothy L., and Cindy A. Schipani. *The Role of Business in Fostering Peaceful Societies*.

# Human Trafficking in Ukraine

Human trafficking exemplifies the severe human rights risks businesses must address, especially in conflict zones like Ukraine. It involves violations of the right not to be subjected to slavery, servitude or forced labour.<sup>46</sup>

Human trafficking typically includes the recruitment, transportation, transfer, harbouring, or receipt of individuals through means such as force, fraud, coercion, abduction, abuse of power or deception, with the intent of exploitation, stripping victims of their freedom and exposing them to profound physical, psychological, and emotional harm.<sup>47</sup>

The right covers ownership of one human by another, in modern terms encompassing different forms of dominance such as debt bondage, trafficking of workers, economic exploitation and confiscation of documents.<sup>48</sup>

Exploitation can include forced labour, sexual exploitation, forced marriage, organ removal, and the abuse of children. Forced and compulsory labour is understood as “all work or service which is exacted from any person under the menace of any penalty (with some degree of intensity) and for which the said person has not offered himself voluntarily”.<sup>49</sup> The fact that the person is paid for their labour does not absolve it of being forced if the other elements of the definition are met.

1) Human trafficking disproportionately affects displaced people, those living in conflict zones or in poverty, particularly women, unaccompanied minors, and individuals lacking legal protection, who are more vulnerable to exploitation. Businesses might inadvertently employ individuals under coercive conditions due to a lack of alternative viable options for work. People displaced by war may accept poor or dangerous working conditions (e.g., excessive overtime, low wages, hazardous environments) to secure livelihoods and ultimately survive.<sup>50</sup> If businesses exploit precarious situations, they could be complicit in forced labour.

2) International businesses often use labour brokers or external recruitment agencies to search for employees. If businesses do not verify the legality and ethics of their recruitment processes, they may end up employing trafficked individuals. Human trafficking networks often target vulnerable populations, luring individuals with false job offers, promising good wages or safe work conditions, and businesses may not have sufficient oversight to prevent the employment of trafficked individuals.

3) When businesses fail to provide safe and humane working conditions, this can amount to forced labour or servitude. For instance, unsafe work environments, excessive hours without proper compensation, or withholding wages can all breach the right to freedom from forced labour.

Violations of human rights are both a cause and a consequence of human trafficking. Therefore, placing the protection of all human rights at the core of measures to prevent and combat trafficking is essential.<sup>51</sup> Multinational companies can potentially be held liable in their home countries for human rights abuses perpetrated in host countries. Therefore, it is in companies' best interest to uphold the standards of international human rights law. This involves conducting heightened due diligence, engagement with local stakeholders, and implementing policies to safeguard human rights, especially for marginalised groups most vulnerable to exploitation.

46) International Covenant on Civil and Political Rights (ICCPR) Article 8.

47) Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

48) International Labour Organization (ILO) *Global estimates of modern slavery: Forced labour and forced marriage*.

49) ILO Convention 29, Forced Labour Convention (1930), Article 2(1). It seems likely that the definition in Article 8 will accord with that of the ILO.

50) Presentation form La Stranda.

51) Office of the High Commissioner for Human Rights (OHCHR) *Human Rights and Human Trafficking*.

# Companies and Institutions Investing in Ukraine

A list of companies and institutions that are actively investing in or supporting investment in Ukraine has been included to highlight their role in the country's recovery and development. By identifying these entities, the report aims to showcase practical examples of organisations stepping up to contribute to Ukraine's reconstruction efforts, often under challenging circumstances. This list not only underscores the scale and diversity of ongoing investments but also may serve as a resource for fostering collaboration among businesses, encouraging the adoption of responsible business practices, and holding investors accountable to international human rights standards. Furthermore, it demonstrates the importance of aligning investment strategies with the principles of sustainable development, gender sensitivity, and peacebuilding.

## Norwegian initiatives to support Ukraine's reconstruction and development:

- the Norwegian Investment Fund (Norfund)
- Nansen Support Programme for Ukraine (NORAD)
- Norwegian Ukrainian Chamber of Commerce
- Næringslivets Hovedorganisasjon (NHO)
- Innovasjon Norge<sup>52</sup> - monitors needs and assesses opportunities for Norwegian businesses in Ukraine
- NOCON Norwegian Construction AS - Norwegian facilitator and developer of projects and business opportunities in and around Ukraine.<sup>53</sup>
- Eksportfinansiering Norge (Eksfin)<sup>54</sup>
- Norsk-ukrainsk regjeringskomisjon for handels-, næringslivs- og økonomisk samarbeid

## Companies:

**Confirmed:** Morrow<sup>55</sup>, Scatec<sup>56</sup>, Moelven Byggmodul<sup>57</sup>, Itera, Magnor Vinduet<sup>58</sup>, Tschudi Logistics<sup>59</sup>, Sintef<sup>60</sup>, Bergen Engines<sup>61</sup>, Emergy<sup>62</sup>

**Interested:** Scandinavian Water Technology AS, BRIGHT Products, Cemonite, Hexagon Ragasco, Melbye Group, Marlink, Differ Community Power, Bergen Engines<sup>63</sup>, Asbo by Jixke sp. z o. o.<sup>64</sup>, Pelagia<sup>65</sup>, Hallgruppen<sup>66</sup>, ASAP Norway, Carnetic AS, Cartesian AS, CIC Betongklyngen,

**Provide material assistance** (they are sending some energy products and took part in reBuild): REN<sup>67</sup>, Directorate for Social Security and Preparedness (DSB), Norwegian Directorate of Water Resources and Energy (NVE)<sup>68</sup>

52) Innovasjon Norway. "Kontor Internasjonalt: Ukraina."

53) Nocon. "Norway takes a prominent role in supporting" Ukraine... <https://www.nocon.no/>

54) Eksfin. "Eksfin Jobber for Økt Eksport og Handel med Ukraina."

55) Reuters "Norway's Morrow Agrees to Supply Ukraine with Battery Storage Systems."

56) E24. "Ikke 'Business as Usual', men det er Business."

57) Innovasjon Norway. "Norske Bedrifter Vil Bidra i Ukraina."

58) Nocon. "Customers."

59) Innovasjon Norway. "Norske Bedrifter Vil Bidra i Ukraina."

60) Ibid.

61) Norwegian Government. "Solid Norsk Fotavtrykk på Gjenoppbyggingskonferanse for Ukraina."

62) Ibid.

63) Business Norway. "Meet Team Norway at Rebuild Ukraine 2024."

64) All the companies listed above: Innovation Norway. "Disse Norske Løsningene Skal Løse Ukrainske Utfordringer."

65) Norwegian Government. "Næringsministeren i Ukraina for å Styrke Næringslivssamarbeidet."

66) Hallgruppen. "Expanding into Poland."

67) Norwegian Government. "Åpningsinnlegg: Rebuild Ukraine."

68) REN AS. "Hva Har Vi Gjort for Ukraina, og Hva Kan Vi Gjøre Videre?"

# Summary - Checklist for Businesses:

## Practical Steps for Operational Implementation

This checklist provides step-by-step actions to help teams on the ground implement gender-sensitive and conflict-aware practices. It is tailored for project managers, field teams, and operational staff who are directly responsible for executing business activities in conflict-affected areas. The checklist focuses on actionable, measurable tasks that businesses can integrate into their workflows to ensure compliance with human rights and gender equality principles.

### Conduct Comprehensive Assessments and Integrate Gender Analysis into Risk Assessments

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**Step 1:** Perform a gender and conflict analysis before initiating projects and prepare an exit plan in case you will have to leave quickly.

**Step 2:** Regularly update assessments to reflect changing dynamics.

### Develop and Implement Gender – Inclusive Policies

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**Step 1:** Draft clear policies addressing gender equality in conflict settings.

**Step 2:** Ensure policies are communicated and enforced at all levels.

**Step 3:** Establish clear procedures for reporting and addressing violations

### Engage with Stakeholders

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**Step 1:** Build regular dialogues with women's organizations and conflict-affected communities.

**Step 2:** Incorporate stakeholders feedback into business strategies.

### Provide Training and Support

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**Step 1:** Train staff on gender sensitivity and conflict awareness.

**Step 2:** Offer psychological and logistical support to employees affected by the conflict.

### Monitoring and Evaluation

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**Step 1:** Define KPIs related to gender equality and conflict sensitivity.

**Step 2:** Implement transparent reporting mechanisms to track and communicate progress.



# Recommendations for Businesses

## Strategic Principles for Leadership and Decision-Making

The recommendations provide guidance for senior executives, policymakers, and strategists. They are designed to influence corporate policies and overall business strategy in conflict-affected areas, emphasizing ethical leadership, accountability, and proactive engagement with human rights issues. These recommendations outline broader principles, leaving room for customization based on a business's specific context and needs.

1. **Conduct Heightened Human Rights Due Diligence:** Thoroughly assess potential impacts on conflict dynamics and human rights, including women's rights.
2. **Engage in Meaningful Stakeholder Consultation:** Involve women's organisations, local communities, especially marginalised groups, in decision-making processes.
3. **Implement Conflict-Sensitive Business Practices:** Adapt operations to avoid exacerbating the conflict and contribute to peacebuilding where possible.
4. **Ensure Transparency and Accountability:** Maintain open communication about business activities and address concerns promptly.
5. **Promote Ethical Supply Chains:** Monitor suppliers to prevent involvement in human rights abuses or conflict financing.
6. **Respect Local Cultures and Traditions:** Integrate cultural sensitivity into all aspects of operations.
7. **Avoid Corruption and Illicit Practices:** Establish strict anti-corruption policies and comply with all legal obligations.
8. **Support Community Development:** Invest in initiatives that benefit local populations and promote economic inclusion.



Foto: IMAGO / NTB



# Conclusion

The rebuilding of conflict-affected regions like Ukraine presents a pivotal opportunity for businesses to contribute to a just and sustainable recovery. This report underscores the critical role that Norwegian businesses, particularly in the energy sector, may play in shaping the socio-economic landscape during this reconstruction period. It emphasizes the imperative of implementing heightened human rights due diligence (HRDD) that is both gender-responsive and conflict-sensitive.

This report presents an overview of the unique challenges and obligations faced by businesses operating in such complex environments. By integrating international standards, gender-responsive practices and conflict-sensitive approaches into their operations, companies can prevent exacerbating existing conflicts and avoid becoming involved in human rights abuses. Specifically, the report highlights the necessity of addressing women's rights, recognising that women often bear the disproportionate burden of conflict and can be powerful agents of change in recovery efforts.

Implementing the provisions outlined in this report is not merely a legal or ethical obligation but a strategic investment in long-term stability and success.

Conducting heightened HRDD allows businesses to identify and mitigate risks proactively, fostering trust with local communities and stakeholders. It ensures that recovery efforts are inclusive, equitable, and contribute positively to the peace-building process.

We acknowledge the role that businesses may play in Ukraine's recovery. Their investments, innovations, and operations are catalysts for economic growth and development. However, for this growth to be sustainable and just, it must be underpinned by a deep commitment to human rights and gender equality. This report serves as a practical tool to guide businesses in aligning their practices with these principles, helping them navigate the complexities of operating in conflict-affected areas.

A significant challenge encountered during the preparation of this report was the scarcity of data and limited responsiveness from companies and organisations. These were not unique to any single organisation or company but reflect the complex environment in which these entities operate. The scarcity of data underscores the necessity for companies to adopt gender-responsive and conflict-sensitive due diligence practices. Such approaches enable businesses to proactively address potential risks by incorporating gender analysis and conflict assessments into their operational planning. The lack of information restrained the ability to fully assess the actual impacts businesses operating in conflict-affected areas have on women's status.

The report provides key insights and frameworks that can be utilised by businesses and stakeholders alike. It bridges the divide between policy and practice, offering concrete steps to enhance human rights due diligence in challenging contexts.

**In summary, the obligations outlined in this report call for businesses to:**

- Conduct thorough, ongoing HRDD that is sensitive to the specific risks of the operating environment.
- Integrate gender-responsive approaches to ensure that women's rights and perspectives are central to recovery efforts.
- Engage in meaningful stakeholder consultations, fostering inclusivity and transparency.
- Develop and implement robust policies and mitigation strategies to address identified risks.
- Commit to continuous improvement, monitoring, and adaptation of practices to evolving circumstances.

By embracing these obligations, businesses not only protect themselves from potential risks but also contribute significantly to the creation of a more equitable and peaceful society. They become partners in progress, working alongside communities to rebuild and thrive.

Despite the challenges, this report fills a critical gap by providing actionable guidance and emphasizing the urgency of these issues. It serves as a call to action for businesses to step forward with responsibility and compassion, recognising that their actions have profound impacts on human lives and the future of nations.

As we look ahead, there is an opportunity to reshape the narrative of recovery. By committing to heightened human rights due diligence, businesses can lead the way toward a future where economic development and human rights go hand in hand. Together, we can build a foundation for lasting peace and prosperity, where every individual has the chance to flourish.

Take the chance to not only rebuild but to transform, ensuring that recovery is not merely about restoring what was lost but creating a better, more just world for all.

**In conflict affected and fragile environments**, business can: **Contribute to peace** by helping rebuild the economy, create jobs, deliver services, promote cooperation, and generate revenues.

**Do harm** by contributing to human rights violations, corruption, and lack of trust – all of which are causes of conflict and fragility.

**WHICH PATH DO YOU CHOOSE FOR YOUR BUSINESS?**



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