



GUIDANCE

# Conducting business during armed conflict

*What is International Humanitarian Law (IHL) and how do companies  
comply with their obligations?*



The full-scale Russian invasion of Ukraine in February 2022, along with the conflict between Israel and Hamas and other Palestinian armed groups, have again highlighted the question about how companies can conduct business responsibly in conflict-affected areas.

To answer the question of how to navigate the risks of violating International Humanitarian Law (“IHL”), businesses operating in conflict zones must conduct **heightened human rights due diligence (“HHRDD”)** in line with the UNDP guidelines on Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts (the “**UNDP Guidelines**”) and the current proposed draft of the EU Corporate Sustainability Due Diligence Directive (“**CSDDD**”).

Whilst the scope of the UNDP Guidelines extends beyond situations of armed conflict to other high-risk situations, this guidance will focus specifically on HHRDD in areas of armed conflict and how companies can conduct their activities in compliance with IHL.

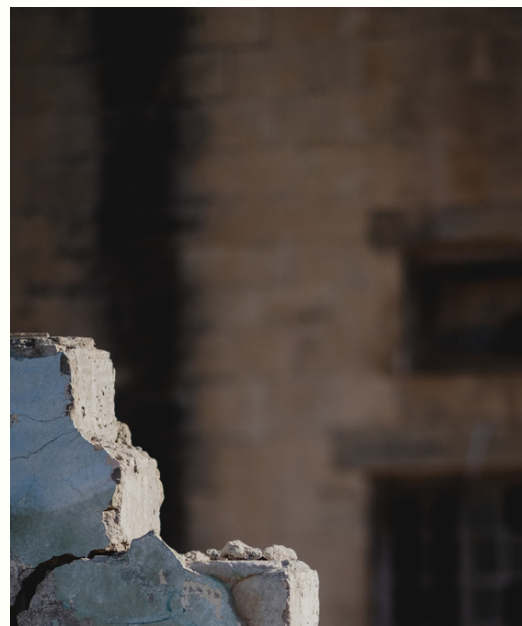
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## What is HHRDD?

Armed conflict always gives rise to an elevated risk of gross human rights abuses and violations of IHL, including international crimes. Therefore, businesses must observe a higher level of scrutiny to assess and address these human rights risks within their operations.

This “**heightened**” HRDD requires a more comprehensive and proactive approach than “standard” due diligence, but will always require the following four processes:

1. **identifying and assessing** actual and potential risks of adverse impacts;
2. **acting** on the findings of these assessments including in preventing, mitigating, stopping and remedying the impacts;
3. **monitoring** the effectiveness of these actions/measures; and
4. **communicating** how risks are being addressed.



Crucially, as part of the identification and assessment process, in situations of armed conflict businesses must take steps to understand the context in which they operate by conducting a thorough **conflict analysis**.

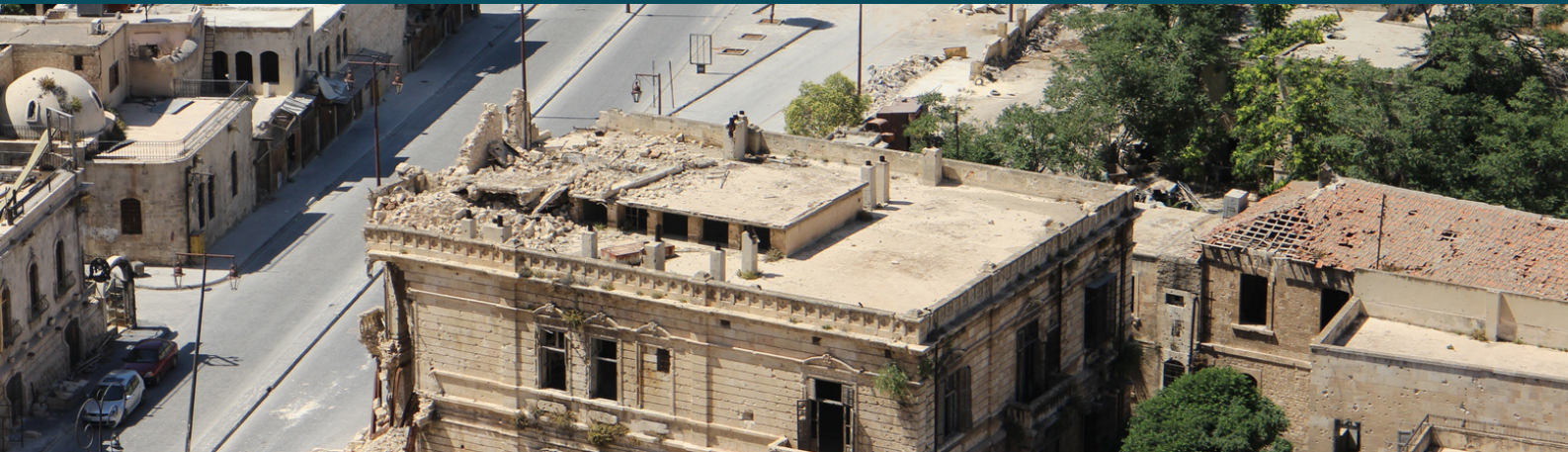
This means that a business must aim to understand the root causes of the conflict, the triggers, the parties driving the conflict, any crimes occurring and the (potential) impact of the company’s business activities on the conflict. This also cannot be achieved without meaningful and conflict-sensitive stakeholder engagement.

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In other words, a conflict analysis requires a rigorous assessment of the conflict, sufficient to identify the dynamics, its likely evolution, and the context of any human rights and IHL violations. Conducting the analysis will allow for a robust assessment of the possible risks of company complicity in any crimes committed by the parties to the conflict. In a war between states, businesses must conduct heightened due diligence relevant to **each** state. Given the complexity of these issues, engaging experts to help conduct this analysis is highly recommended.

Further practical advice on conducting HHRDDD can be found in the **Practical Guidance** section below.





## What is IHL and when does it apply?

The UNDP Guidelines and the **current draft of the EUCSDD** mandate that companies respect IHL and International Criminal Law (“**ICL**”) standards.

IHL, sometimes known as the “law of war”, is the body of law that governs the conduct of armed conflict. It serves two functions:

1. protects persons who are not or are no longer participating in hostilities; and
2. restricts the means and methods of warfare.

The majority of IHL is contained in the four Geneva Conventions of 1949 which have received almost universal ratification by states. War crimes include the grave breaches of these Conventions, serious violations of the laws and customs applicable in armed conflict, and crimes listed in Article 8 of the Rome Statute of the International Criminal Court.

ICL exists to prosecute and criminalise these specific violations of IHL.

*War crimes include a wide range of prohibited conduct that include intentionally directing attacks against the civilian population and civilian objects*





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### CASE STUDY: LUNDIN ENERGY

In 2021, the Swedish prosecutor charged the former CEO, Alex Schneider (a Swiss citizen), and chairman of the board, Ian Lundin, of the Swedish company Lundin Energy for complicity in war crimes committed in Sudan between 1999 and 2003. The indictment alleges that the company was complicit in the commission of war crimes by hiring the Sudanese military as security, in full knowledge that it would use force to take control of an area where Lundin would conduct its oil exploration activities. Whilst clearing the area for Lundin's operations, the Sudanese military committed war crimes. According to the indictment Lundin was complicit in the commission of war crimes as:

**“they made these demands despite understanding or, in any case being indifferent to the military and the militia carrying out the war in a way that was forbidden according to international humanitarian law”<sup>1</sup>**

The Swedish Court has found that it has jurisdiction of the case and the trial on the merits is ongoing. The accused face the potential for imprisonment.

### CASE STUDY: VAN ANRAAT

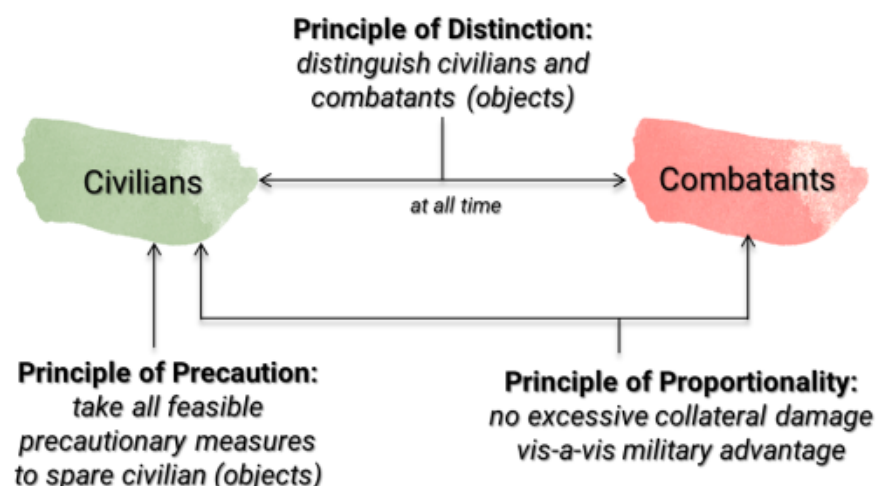
In 2005, van Anraat a Dutch businessman was found guilty of complicity in war crimes and sentenced to 17 years in prison for the supply of the chemical, thiodiglycol, to Saddam Hussein's government in Iraq which was used to manufacture mustard gas. The gas was used to launch chemical attacks in the Iran-Iraq war as well as against the Kurds in Northern Iraq.

Van Anraat was the sole supplier of thiodiglycol to the Iraqi government and was found to be aware that the chemical would be used to produce mustard gas for use by Iraq in armed conflict. The use of asphyxiating gases (such as mustard gas) in warfare is prohibited under IHL.

The cardinal principle in IHL is the principle of **distinction** (military objectives v. civilian objects and combatants v. civilians); namely that civilians, including former combatants or prisoners of war, and civilian objects (hospitals, schools, etc.) may never be deliberately attacked and such targeting may cross the threshold into war crimes.<sup>2</sup> In broad terms, combatants include members of the armed forces of the warring states,<sup>3</sup> or non-military individuals in self-defence groups against invaders.<sup>4</sup> Civilians are everyone else.<sup>5</sup> Military objectives are limited to “those objects which by their nature, location, purpose or use make an effective contribution to military action and whose total or partial destruction, capture or neutralisation, in the circumstances ruling at the time, offers a definite military advantage”. Conversely, a civilian object is one which is not a military objective.<sup>6</sup>

**Indiscriminate attacks** are those which are not directed at specific military objectives, employ a method or means of combat which cannot be directed at a specific military objective, or which employ methods or means of combat which cannot be limited (e.g., chemical or biological weapons) and hence, are of such nature to strike military objectives and civilians **without distinction**.<sup>7</sup>

The lawfulness of an attack does not however, solely depend on the principle of distinction. The rule of **proportionality** requires that an attack which is expected to cause incidental loss of life and damage to civilian objects should not be excessive in relation to the concrete and direct military advantage anticipated.<sup>8</sup> Similarly, all feasible **precautions** must be taken to avoid (and in any event to minimise) incidental loss of civilian life injury or damage to civilian objects.<sup>9</sup> Failure to abide by these principles can constitute a war crime.

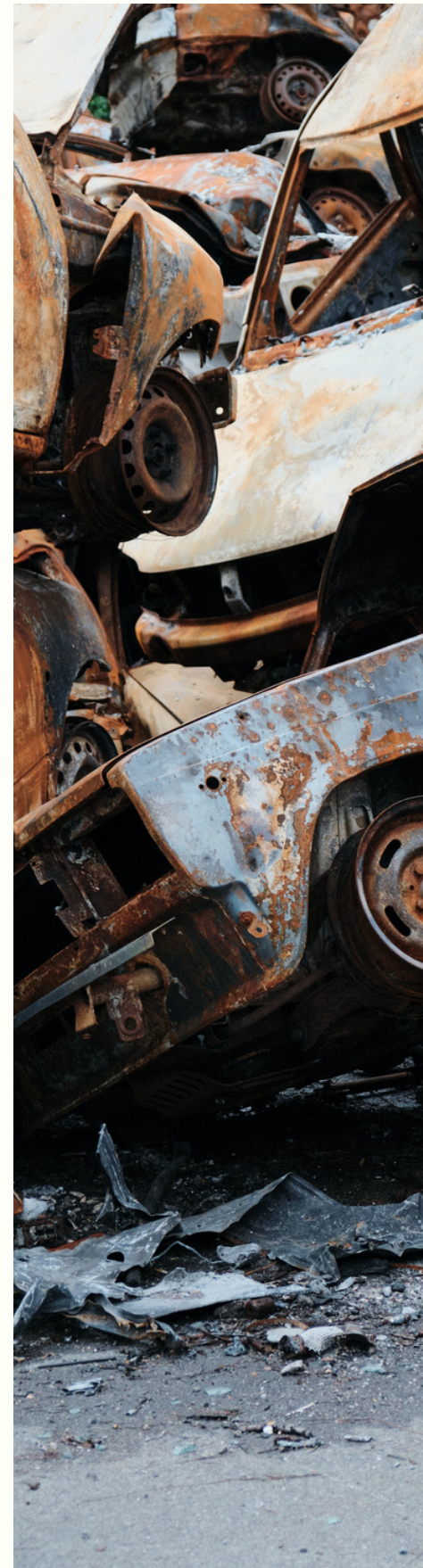


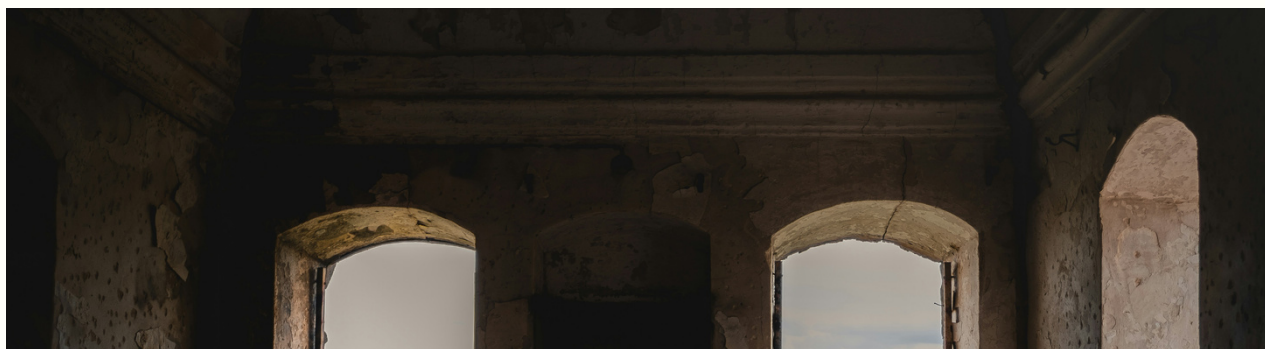


IHL applies both in international armed conflict (“**IAC**”) (i.e., a war between two or more states) as well as (albeit in a more limited fashion) to non-international armed conflict (“**NIAC**”). NIACs (more commonly known as civil wars) are restricted to the territory of one state either where conflict occurs between regular state forces and non-state armed groups or armed groups fighting each other.

IHL also applies to **any territory occupied** during an IAC. As such, destruction, exploitation or use of natural resources (including land) from occupied territories for the domestic purposes of the occupying power<sup>10</sup> and transfers of civilians are prohibited and may constitute war crimes.

To note, business assets or personnel, which are otherwise civilians or civilian objects, may become military targets when, for example, armed forces use an asset to launch or defend against attacks, or when assets are re-purposed for the purposes of combat or military advantage (e.g. for the manufacture of weapons used in the armed conflict).





## When are businesses bound by IHL?

Not all business activity in a situation of armed conflict is bound by IHL. However, where the actions of a business are **closely linked** to an armed conflict, they are bound by IHL. In these circumstances, they may be found to be directly or indirectly responsible (complicit) for the commission of war crimes if they provide practical assistance, support or encouragement that has a substantial effect on the commission of a war crime *and* those involved know that the assistance, support or encouragement will facilitate the crime.

Determining when actions are closely linked to an armed conflict, requires an in-depth assessment of the conflict and the business activity. This is why HHRDD is critical. Businesses may be closely linked to an armed conflict and thus at risk of committing violations of IHL in a variety of ways, including if they:

- Provide financial or material support to a party to the armed conflict (see *Kolmar* case) e.g., through the provision of jet fuel which is then used in air strikes on civilians.
- Provide advice to one of the armed forces on the conduct of hostilities, for example by providing technical advice on how to engineer environmental damage by destroying a dam.
- Manufacture or supply prohibited weapons (see the *Van Anraat* case) or supply weapons to end users who the business knows will violate IHL (see the *BAE systems et al*, communication and the *Kouwenhoven* case)
- Procure security services (including State armed forces) that commit war crimes (see the *Lundin* case).





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- Conduct activities that lead to, or facilitate, the transfer of civilians, including through the conduct of security operations (e.g., the *Lundin* case) or in occupied territories.
- Provide support for the exploitation of natural resources to the occupying power of an occupied territory.
- Pay revenues to an occupying state that are then used otherwise than for the protected population (i.e. the civilians living in the occupied areas).
- Acquire or seize business assets or property without the consent of the owner or through threats and intimidation. This can constitute the war crime of pillage.
- Benefit from forced labour including labour conducted by prisoners of war.
- Generate profits for one of the warring parties.
- Assist in mobilisation efforts by providing lists of eligible employees who then go on to commit war crimes.

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Where a war is *per se* unlawful (i.e., not authorised by the UN Security Council or in self-defence), businesses should conduct a robust assessment of its links to the aggressor state and avoid, or responsibly cease, all activity which connects the business to the state's war effort. This may extend as far to ceasing trade with the state or state-linked entities.

## What are the sanctions for failing to uphold IHL?

Cases brought against corporations for complicity in war crimes are increasing and this trend is likely to continue with the implementation of the EUCSDDD. The gravity of non-compliance is underscored by the potential for criminal and civil liability faced by businesses and their managers for violations of IHL. As outlined above, serious breaches of IHL may amount to war crimes (and sometimes crimes against humanity, or violations of the 1948 Genocide Convention). Perpetrators, their superiors and accomplices, including business personnel, may be directly and indirectly liable for the commission of war crimes.

A company employee may be complicit where the **business provides practical assistance, support or encouragement that has substantial effect on the commission of a war crime when he/she has knowledge that the assistance, support or encouragement will facilitate the crime.** Those who exercise control and influence over the decisions made by their companies may face individual criminal liability for war crimes both at the International Criminal Court and in national courts. In certain states (Switzerland, Australia) companies may also face criminal sanctions.



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### **CASE STUDY: KOUWENHOVEN**

In December 2017, Guus Kouwenhoven, a Dutch national was convicted of complicity in war crimes and illegally importing weapons and ammunition and sentenced to 19 years in prison in the Netherlands. Kouwenhoven was the owner and president of two logging companies operating in Liberia during the civil war between 1999 and 2003. The court found that Kouwenhoven, through these companies, deliberately imported, stored and distributed weapons used to commit war crimes by the Liberian armed forces and provided transportation, sites and personnel to the armed forces.<sup>14</sup>

If the standard for criminal liability is not met, businesses may also face civil claims brought by victims of violations. In these types of cases, the business may be required to compensate the victim. The standard of proof in a civil trial is lower than a criminal trial (51% likelihood of involvement is sufficient) and so it is often the preferred strategy of NGOs and victims.

The draft EUCSDD also creates sanctions which may be applied by Member States, including naming and shaming, cease and desist orders, removal of the company's goods from the EU market or bans from public procurement and fines (which are not less than 5% of the company's net worldwide turnover).

In addition, there are serious reputational risks which a company may face if confronted with an indictment or accusation of complicity in war crimes.

Mere minimum compliance with regulations, directives and reporting requirements may protect companies to a degree but it may still leave a company or its personnel exposed to criminal and civil liability. Going beyond compliance is not only about legal risk, but also about sustainability – protecting local individuals or communities, building resilience, and a reputation that creates value.

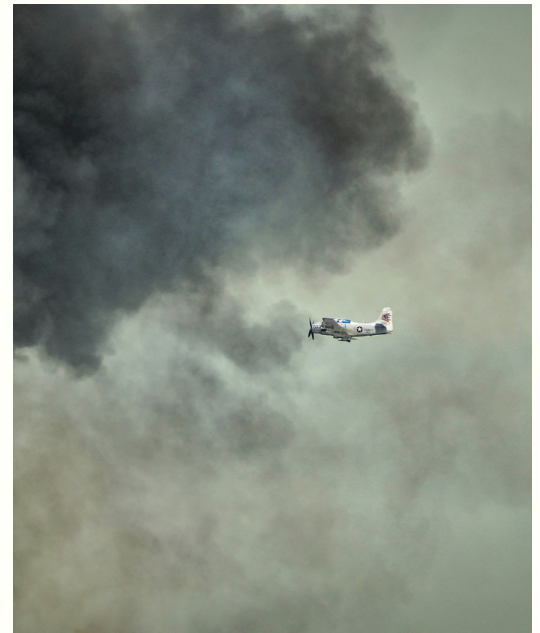
## Practical Guidance

### *Conducting business activity in areas of armed conflict whilst complying with IHL*

Where businesses are operating in areas of armed conflict, they should be conducting HHRDD. This means identifying, acting, monitoring, and communicating to ensure that they are not causing or contributing to violations of IHL or human rights abuses.

How this is conducted depends on the sector the company operates in as well as the context. However, in practice this means that companies should:

### ASSESS



**Conduct a conflict analysis:** It must be aimed at establishing an understanding of the root causes and triggers of the conflict, the parties driving the conflict, the violations arising and the impact of the company's business activities on the conflict. This assessment needs to be conducted in all geographical areas affected by the armed conflict.

**The assessment must be based on meaningful and conflict-sensitive stakeholder engagement.** Thus, conducting a robust **stakeholder mapping** exercise to understand the company's business relationships and the links to one of the parties to the conflict is essential:

- (a) Companies should map their subsidiaries, suppliers, customers, and other business relationships, including with investors and financing institutions. This applies to both existing and future relationships.
- (b) Thorough KYC (know-your-customer), checks should be undertaken to understand ultimate beneficial ownership of suppliers to discover actual or potential financial links to one of the parties to the conflict.
- (c) Particular attention should be paid to the existing use of military or paramilitary forces that provide security services.



**Identify risks to beneficiaries:** Companies should take steps to identify the risks of continuing operations for their employees, contractors, suppliers, and customers. During armed conflict, health, safety and environmental risks are elevated and these need to be assessed. Companies should also be mindful of labour rights limitations, especially when detrimental changes occur to working hours and wages through regulatory impacts.<sup>15</sup>

**Assess risks of being closely linked to violations:** In areas of conflict in particular, assessments should include determinations of whether products or operations can be used to support one side of the conflict materially or financially, whether any of the materials sourced were obtained illegally and whether materials were sourced from an occupied area (for the benefit of the occupying power).

A similar assessment is required of company suppliers. Asking for self-assessments from suppliers is not sufficient. Companies need to conduct their own investigations into supplier compliance including thorough desk research, unannounced audits (where possible considering the security situation) and meaningful consultations with CSOs, workers and trade unions.

**Determine points of leverage:** Assess whether the company can place pressure on those parties violating IHL or those who could make a positive impact to remediate harm and ameliorate risks, especially where the company has an established relationship with one of the parties.

**Seek specialist advice:** Companies should seek specialist advice to assist in conducting HHRDD assessments and to understand their legal risks.

### **CASE STUDY: BAE SYSTEMS ET AL.**

In December 2019, a coalition of NGOs submitted a communication to the Prosecutor of the International Criminal Court against BAE Systems, Leonardo, Airbus, Dassault, Raytheon, RWM Italia, MBDA. The communication alleged that these companies aided and abetted the commission of war crimes by exporting arms and ammunition and providing logistical support to Saudi Arabia and UAE whose forces then committed war crimes in Yemen in the knowledge that war crimes were or could be committed. Some of these arms were used to conduct airstrikes on civilian objects.

## ACT

**Prioritise the safety of beneficiaries:** Companies should ensure the safety and security of their staff and their workplace. For example, companies need to put in place evacuation plans and ensure access to medical and psychological assistance.

**Design or update a Human Rights Policy which includes specific provisions for conduct in conflict areas:** Senior management should be assigned responsibility to drive the process involving cross-functional personnel (e.g., HR, legal, compliance, procurement, security) both at HQ and in countries of operation. Companies should also engage with relevant stakeholders, both internally and externally (CSOs, international organisations and governments), in drafting this enhanced policy. It should be updated regularly when significant changes occur e.g., when the conflict expands, or a new area is placed under military occupation. The policy should be distributed throughout the organisation so that all employees are aware of the prevailing obligations.

**Establish a supplier code of conduct:** Companies should establish or amend existing codes of conduct with business partners to ensure compliance with IHL. Such codes must be fair, reasonable and non-discriminatory. Codes of conduct may, for example, specifically require that suppliers cooperate in the investigation and assessment of impacts and provide access to relevant information and unannounced audits. Where violations occur (or at risk of occurring) within the supply chain, companies should, as far as possible, engage with suppliers and jointly conduct due diligence activities.





## CASE STUDY: TOTAL SA

In October 2022, two NGOs submitted a complaint to the anti-terrorism unit of the French public prosecutor, alleging that Total SA was complicit in war crimes committed by the Russian armed forces in Ukraine. The complaint alleged that Total was profiting from the sale of gas condensate which was made into kerosene used to fuel Russian fighter jets.

The public prosecutor dismissed the case in January 2023, on the basis that conduct of complicity was not sufficiently characterised as intentional. The NGOs will appeal the decision.

**Implement the policy across company operations:** Companies should design or revise business processes to incorporate HHRDD. This may include merger and acquisition processes, management systems, audit programmes and procurement criteria.

Companies should take the following measures:

- Companies should aim to obtain contractual assurances that their direct business partners will comply with the code of conduct. Contractual clauses prohibiting sourcing goods from areas under occupation can also be inserted into standard agreements. Corresponding contractual assurances from a suppliers' partners can also be requested. These however, should not act as a replacement to continual engagement with suppliers nor a shifting of legal risk or liability.
- Businesses should also consider their procurement practices and implement policies to prohibit procurement from certain geographical areas or parties to conflicts. Procurement and sourcing teams need to be working collaboratively with the company's sustainability team on issues pertaining to human rights and IHL.
- Companies should review company training to include robust human rights guidance for conflict areas. Companies should provide specific training to management and those responsible for implementation of the human rights policy on conduct during armed conflict and the relevance of IHL and international human rights law.
- Companies are encouraged, as far as possible, to engage private security companies who are members of the International Code of Conduct for Private Security Providers (ICOCA) and have made commitments to uphold human rights.



**Design and implement a prevention plan:** Companies should implement a prevention action plan which sets out how any impacts will be resolved if they occur. Companies should also require compliance with the prevention plan from their suppliers.

**Take “appropriate measures” to remedy any adverse impacts:** This is not a ‘one size fits all’ approach, but rather measures should be proportionate to the severity and likelihood of the impact and the company’s resources.

The current draft of the EUCSDD gives examples of what might constitute appropriate measures.

### APPROPRIATE MEASURES

- Avoiding or mitigating the risk
- Setting out a corrective action plan where the adverse impact cannot be immediately brought to an end. The plan should include clearly defined timelines for the implementation of measures
- Improving, modifying or withdrawing investment
- Adapting business practices including purchasing practices
- Providing financial or administrative support to a business partner

**Terminate the business relationship as a last resort, where the negative impact cannot be ended:** The UNDP Guidance makes it clear that termination is a serious and last resort measure and should only be taken where the negative impact cannot be ended or there is no reasonable prospect for change. Exiting too quickly may have damaging effects, e.g., forcing employees or children into joining an armed group to earn a living. The assessment whether to leave is to consider whether an exit would increase tensions between conflicting sides or whether the harm would outweigh the benefits. For example, if the company is providing essential medicines to a civilian population or if the business assets will become nationalised and be repurposed for the furtherance of the war effort rather than for a non-military purpose, the harms of an exit may outweigh the benefits. Consultation with the local population is key to a successful exit. An exit may involve for example the suspension of payments that would have reached one of the parties to the conflict, review of leases on land owned by one of the parties, or stoppage of new projects or investments.<sup>16</sup>



**Design and operate an effective and functioning operational grievance mechanism (OGM):** This mechanism enables workers and local communities to report or raise grievances regarding actual or potential adverse IHL/human rights violations with respect to the companies' own operations, the operations of their subsidiaries and their value chains. The mechanism needs to be public and easily accessible to affected stakeholders. In accordance with international standards, complaints should be entitled to request from the company appropriate follow-up on the complaint and to meet with the company's representatives at an appropriate level to discuss potential or actual severe adverse impacts that are the subject matter of the complaint. Companies should also encourage their suppliers to ensure that their workforce and communities have access to OGMs.

**Remedy the impact:** Where a company has contributed to an adverse impact, the company needs to take measures to remedy it. Remedy should aim to restore the affected people or communities to a situation equivalent or as close as possible to their situation prior to the impact. This includes: compensation, restitution, rehabilitation, public apology, reinstatement or cooperation in good faith with investigations.

## CASE STUDY: KOLMAR GROUP

In April 2022, the Swiss Attorney General opened a criminal investigation into complicity for pillage for alleged smuggling of gas oil by Kolmar Group which belonged to a Libyan state-owned company. The investigation is ongoing.





## MONITOR

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### Monitor the effectiveness of the policies and measures

Companies should pay continued attention to the risks of being involved or contributing to violations. Companies should also pay attention to the activities of their business and supply chain partners to monitor if any risks have actualised. Assessments should be conducted at regular intervals: prior to entering into new business activity or changes in operations, in response to the changing conflict (i.e., occupation of new areas) and periodically throughout the company operations.

### Monitor the progress of the conflict

Companies should also continue to monitor the conflict. Monitoring requires engagement with government, civil society, international organisations, and other relevant stakeholders to understand the operating environment. A basic minimum may involve a company setting up daily alerts and conflict updates that can be sent to all relevant employees with information about the progress of the conflict (the [Institute for the Study of War](#) provides daily updates on various conflicts). Be mindful of reports which allege that violations have been conducted by one of the parties to the conflict.

## COMMUNICATE

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**Communication of measures:** Communicating measures which have been undertaken to remedy and address violations is essential for demonstrating compliance with HHRDD. For example, under the current draft of the EUCSDD, companies will need to document and demonstrate that they have monitored and assessed their operations and retain documents for 10 years.

Companies should communicate the human rights policy and supplier code of conduct widely, both internally and externally, and publish policies on the company website.



- **Communicate regularly with relevant stakeholders:** Companies should provide regular public updates on company operations and explain their reasons for continuing to operate in areas of armed conflict. This will help demonstrate compliance with HHRDD responsibilities, and will show that the company is striving to put in place effective procedures to ensure respect for IHL.
  - **Accessible grievance mechanisms:** Consider providing a dedicated easily accessible hotline for affected employees and contractors to report concerns about operations in conflict areas.
  - **Publishing transactions:** Companies should publish all payments to governments under contractual agreements, especially when such payments are made to the occupying power.
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## Conclusion

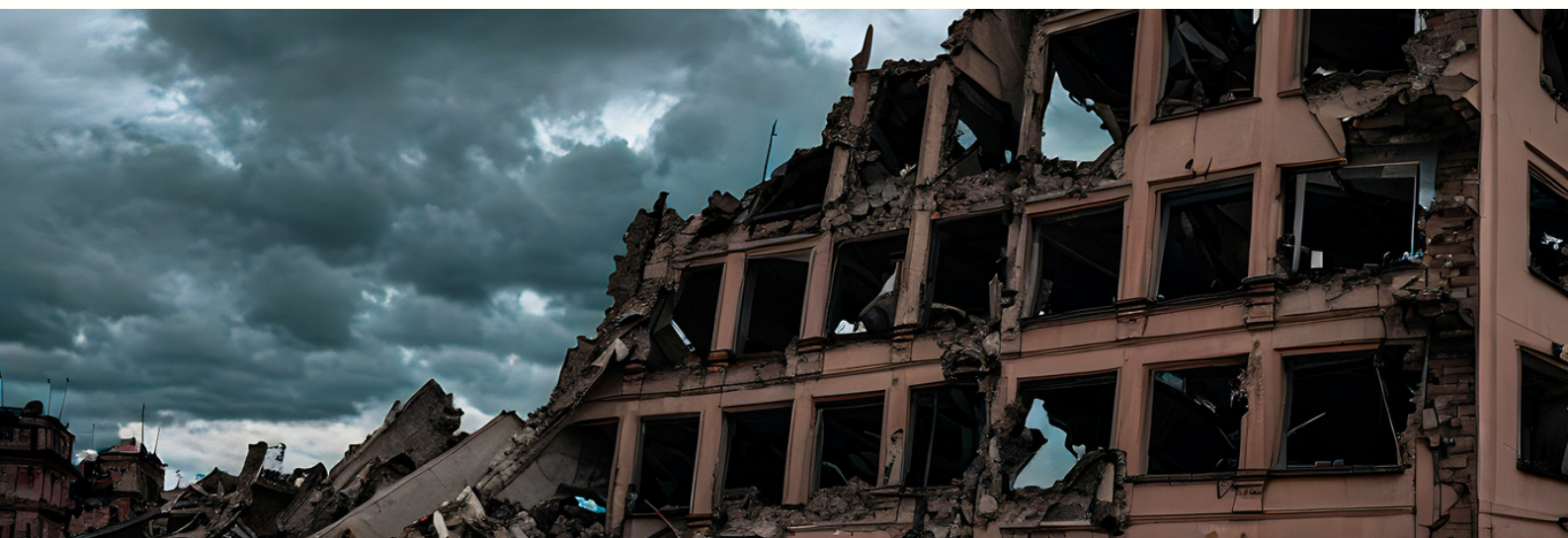
Companies are required to undertake comprehensive HHRDD and adhere to international humanitarian and human rights laws when operating in conflict-affected regions.

When determining the necessity of imposing sanctions, authorities will evaluate various factors. These include the company's responsiveness to corrective actions, its effectiveness in addressing complaints, and the reasonableness, credibility, and good faith of its decisions.

The potential for reputational damage to the company is substantial. Therefore, a thorough and heightened due diligence process is imperative not only to showcase compliance but also to minimise legal risk.

**To ensure adherence to the legal frameworks, companies are strongly advised to seek guidance from legal experts.**

For more information or advice contact us at [hello@businesshumanrightscompliance.co.uk](mailto:hello@businesshumanrightscompliance.co.uk).





## References

1. Lundin indictment available [here](#).
2. ICRC Customary IHL Rule 1 available [here](#).
3. Third Geneva Convention, Article 4A(1), (2), (3); Additional Protocol I, Article 44(3). For detailed analysis of each subparagraph, see Sassòli IHL, p. 252; Y. Dinstein, *The Conduct of Hostilities under the Law of International Armed Conflict* (3rd edn, CUP 2016) ('Dinstein (2016)'), pp. 52.
4. Third Geneva Convention, Article 4(A)(6). For detailed analysis, see, S. Watts, 'Who Is a Prisoner of War' in A. Clapham et al. (eds), *The 1949 Geneva Conventions: A Commentary* (OUP 2015), p. 907.
5. Additional Protocol I, Article 50(1).
6. Additional Protocol I, Article 52(2).
7. ICRC Customary IHL Rule 12 available [here](#).
8. ICRC, Customary IHL Rule 14 available [here](#).
9. ICRC, Customary IHL, Rule 15 available [here](#)
10. See for example ICJ, *Armed Activities on the Territory of the Congo (Democratic Republic of the Congo v. Uganda)*. See also HRW "[Responsible Business in Occupied Areas](#)" for more information on the law of occupation.
11. ICRC, *Business and Humanitarian Law*, available [here](#).
12. UN Charter article 51.
13. *ibid*.
14. *Kouwenhoven Appeal Judgment*, available [here](#).
15. OECD, *Responsible business conduct implications of Russia's invasion of Ukraine*, available [here](#).
16. Reuters, *Foreign companies withdrawing from Myanmar after coup* available [here](#).



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**For inquiries,  
contact us.**



**Wayne Jordash**  
Managing Partner



**Lara Strangways**  
Head of Business and Human Rights



**Jowita Mieszkowska**  
Legal Adviser



[www.businesshumanrightscompliance.co.uk](http://www.businesshumanrightscompliance.co.uk)



[hello@businesshumanrightscompliance.co.uk](mailto:hello@businesshumanrightscompliance.co.uk)



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