

# Human Rights Report

National Business and Human Rights Pact  
2024

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Based on the UN Guiding Principles Reporting Framework



***Ecocitizen SARL***

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1331 Luxembourg

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## Company data

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### Prerequisite data

**Organisation name:** Ecocitizen SARL

**Human rights coordinator:** Adriana González

**Signature date of the Business and Human Rights National Pact:** 17 october 2023

**Number of employees in Luxembourg:** 1

**Number of employees outside of Luxembourg:** 0

**Number of entities concerned by this report:** 1

**Names of concerned entities:** Click here to enter text.

### Background information

**In which sector of activity does your organization operate?**

Environment; Space

**List the 10 most important countries in which you operate (*max. 10*)** Luxembourg

**List the 10 most important countries in which you supply (*max. 10*):**

Luxembourg

## Human Rights Report

### PART A: HUMAN RIGHTS GOVERNANCE

According to Principle 16 of the UN Guiding Principles on Business and Human Rights, to anchor responsibility for respecting human rights, the company must formulate its commitment publicly through a policy statement that: (a) is approved at the highest level of the company, (b) is drawn up using internal and/or external expertise, (c) sets out what the company expects of its staff, business partners and other parties directly linked to its activities, products and services in the field of human rights, (d) is accessible to the public and is the subject of internal communication.

#### A1: PUBLIC ENGAGEMENT

The adoption of a human rights policy is the first important step in embedding respect for human rights in the company's values, as it will trigger the adoption and development of internal policies and procedures to meet this commitment. The policy communicates externally and internally the company's minimum standard of responsible behaviour, including management's expectations of how all employees and business partners have to act, and demonstrates an understanding of the risks and opportunities.

UNGP	Information and objectives	Answers <i>[Please insert your answers in this column. The examples in grey are for inspiration only.]</i>
A1	<b>What public statements does your company make about its commitment to respecting human rights?</b>	<i>In 2023, initiatives were taken to draw up public statements on human rights and, in 2024, the human rights declaration and employee code of conduct were put in place</i>
A1.1	<b>How has this public commitment been developed?</b>	<i>Public engagement was designed and reviewed by EcoCitizen's management team</i>
A1.2	<b>Who is the public commitment to human rights aimed at?</b>	<i>EcoCitizen's public commitment concerns all employees, suppliers, customers, communities, business partners and stakeholders.</i>
A1.2	<b>Which human rights are covered by your commitment?</b> <i>(Please tick the human rights you have addressed.)</i>	<input type="checkbox"/> Right to self-determination <input type="checkbox"/> Right to life <input checked="" type="checkbox"/> Right not to be subjected to torture or cruel, inhuman and/or degrading treatment or punishment <input type="checkbox"/> Right not to be subjected to slavery, servitude or forced

		<p>labour</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Right to liberty and security of oneself</li> <li><input type="checkbox"/> Right of detainees to be treated humanely</li> <li><input type="checkbox"/> Right to freedom of movement</li> <li><input type="checkbox"/> Right of foreigners to a fair hearing in the event of threatened expulsion</li> <li><input type="checkbox"/> Right to a fair trial</li> <li><input type="checkbox"/> Right not to be subjected to retroactive criminal legislation</li> <li><input type="checkbox"/> Right to recognition of one's legal personality</li> <li><input checked="" type="checkbox"/> Right to privacy</li> <li><input checked="" type="checkbox"/> Freedom of thought, conscience and religion</li> <li><input checked="" type="checkbox"/> Freedom of opinion and expression</li> <li>Right not to be subjected to propaganda in favour of war or to advocacy of national, racial or religious hatred</li> <li><input type="checkbox"/> Freedom of assembly</li> <li><input checked="" type="checkbox"/> Right to family protection and right to marry</li> <li><input checked="" type="checkbox"/> Right to children protection</li> <li><input type="checkbox"/> Right to participate in public life</li> <li><input checked="" type="checkbox"/> Right to equality in front of the law, equal protection of law and freedom from discrimination</li> <li><input checked="" type="checkbox"/> Rights of minorities</li> <li><input type="checkbox"/> Right to work</li> <li><input checked="" type="checkbox"/> Right to just and favourable conditions of work</li> <li><input type="checkbox"/> Right to form and join trade unions and to strike</li> </ul>
A1.3	<b>How is the public commitment disseminated?</b>	<p><i>Companies' public declarations of commitment are listed on the EcoCitizen website <a href="https://ecocitizen.lu">https://ecocitizen.lu</a> During bilateral meetings with the relevant stakeholders, the issue of human rights is generally raised.</i></p>
<p><b><u>Progression plan to be undertaken for part A1</u></b></p>		

## A2: INTEGRATION OF HUMAN RIGHTS COMPLIANCE

UNGP	Information and objectives	Answers
		<i>[Please insert your answers in this column. The examples in grey are for inspiration only].</i>
A2	<b>How does your company demonstrate the importance it places on implementing its commitment to human rights?</b>	<p><i>EcoCitizen demonstrates its commitment to human rights by integrating principles into its business policies and requiring ethical standards from its suppliers, as demonstrated by its employee code of conduct. In addition, the company is committed to engaging with local communities, maintaining transparency in its operations, defending human rights globally and continuously improving its practices. As EcoCitizen's main area of interest is sustainable development and climate change, there is an important aspect of gender relevance. In all our projects, sex-disaggregated data is collected, and in the design of our initiatives, this aspect is taken into account from the outset, along with respect for local communities. An expert from the</i></p> <p><i>UN Climate Technology Centre and Network's (UN CTCN) roster of gender and climate technology experts verifies and evaluates all our projects.</i></p>
A2.1	<b>How are the day-to-day responsibilities for respecting human rights organized within your company, and why?</b>	<p><i>Responsibility is spread throughout the organization - every employee plays a key role in ensuring that EcoCitizen's human rights standards are met on a daily basis. This decentralized approach ensures that all employees take responsibility, whether or not a member of management is present.</i></p>
A2.2	<b>What types of human rights-</b>	<p><i>The management team is aligned with the protection of</i></p>

	<b>related issues are discussed by senior management and the board of directors, and why?</b>	<i>human rights - all relevant issues verified in A1.2 are discussed when approaching all new projects or business ideas. EcoCitizen is a government accredited private research institute (AgrRED/24-004). This requires the company management and the board to discuss and draft potential scientific research proposals with public and private partners. EcoCitizen's principles include for example ensuring that all research in which we potentially participate is aligned with the highest ethical principles, such as those set out in the UNESCO Universal Declaration on Bioethics, the Declaration of Helsinki and the Belmont Report. In practice for example, such principles include guaranteeing that informed consent is obtained from all participants in our research, and that the confidentiality of all information collected is guaranteed above and beyond statutory compliance requirements.</i>
A2.3	<b>How are employees and contract workers made aware of how respect for human rights should guide their decisions and actions?</b>	<i>The induction process for new employees will include a chapter on human rights. As EcoCitizen deals with topics related to sustainable development and climate change, it is natural to integrate human rights into any discussion with the team.</i>
A2.4	<b>How does your company clearly communicate the importance it places on respecting human rights in its business relationships?</b>	<i>EcoCitizen is very intentional about entering into business relationships with partners whose human rights perspectives and actions are verified before contracts are concluded.</i>
A2.5	<b>What lessons has your company learned during the reporting period regarding ensuring respect for human rights, and what changes have resulted from these insights?</b>	<i>Policies such as the employee code of conduct and the human rights declaration have been reviewed and revised to reflect the objectives of the reporting period. This review is ongoing to ensure that EcoCitizen always promotes up-to-date information and manages human rights standards to the best of its ability.</i>

## **Progression plan to be undertaken for part A2**





## PART B: DEFINING THE REPORTING AXIS

According to **Principle 18** of the UN Guiding Principles on Business and Human Rights, in assessing human rights risks, companies should identify and assess all actual or potential adverse human rights impacts in which they may have a stake, either through their own activities or as a result of their business relationships.

Identifying and assessing actual and potential negative impacts is an essential step in ensuring a proper human rights due diligence process. This will enable you to take appropriate action. A proper assessment must take into account all areas of the company, across operations and relationships (including supply chains) where human rights risks are most likely to be present and most significant. The assessment must go beyond the identification of material risks to the company and include risks to rights-holders.

UNGP	Information and objectives	Answers <i>[Please insert your answers in this column. The examples in grey are for inspiration only].</i>
B1	<p><b>Statement of salient matters:</b></p> <p><b>Indicate the salient human rights issues related to your company's activities and business relationships during the reporting period.</b></p> <p><i>(Please tick the salient risks identified and/or add other identified risks.)</i></p>	<p><input type="checkbox"/> Risks related to the acquisition, construction or operation on the territory of indigenous people</p> <p><input type="checkbox"/> Risks related to the health and safety of consumers, company workers, neighbouring communities and within the value chain</p> <p><input checked="" type="checkbox"/> Risks relating to the mental health of workers or the deterioration of working conditions</p> <p><input type="checkbox"/> Risks related to forced labour (e.g.: use of temporary workers)</p> <p><input type="checkbox"/> Risks related to illegal employment</p> <p><input type="checkbox"/> Risks related to subcontracting or value chains</p> <p><input checked="" type="checkbox"/> Risks related to fair and equitable working conditions (working hours (e.g.: pressure to work outside the scope of the contract), remuneration, breaks, etc.)</p> <p><input type="checkbox"/> Legal and reputational risks arising from retroactive criminal legislation</p> <p><input checked="" type="checkbox"/> Risks related to discrimination practices (gender, family status, disabled people, age, residence, etc.), violence and harassment in the workplace</p>

		<input type="checkbox"/> Risks related to discrimination or persecution of individuals on the grounds of their religious beliefs, opinions or practices <input type="checkbox"/> Risks related to private life (for employees: issues linked, for example, to the organization of telecommuting work or the risk of misuse of a surveillance camera) <input type="checkbox"/> Risks linked to non-respect for individual freedom, censorship, or reprisals for the expression of divergent opinions. <input type="checkbox"/> Risks relating to the right of association and collective bargaining (e.g.: discrimination against unionized employees, failure to provide the means for the exercise of representation, negotiation, etc.) <input type="checkbox"/> Risks related to the prohibition of child labour (e.g.: trainees on construction sites) <input type="checkbox"/> Risks related to the marginalization or unjustified exclusion of people from decision-making processes and public affairs <input type="checkbox"/> Risks related to the deterioration of working conditions <input checked="" type="checkbox"/> Risks related to fair and equitable working conditions (working hours (e.g.: pressure to work outside the scope of the contract), remuneration, breaks, etc.). <input type="checkbox"/> Risks linked to economic insecurity, poverty and inadequate access to basic needs, which can compromise well-being and human dignity <input type="checkbox"/> Risks linked to lack of access to adequate health care, discrimination in the provision of health services <input type="checkbox"/> Risks linked to the prohibition of participation in cultural life and scientific progress, as well as the protection of the moral and material interests of creators <input type="checkbox"/> Other identified risks:
B2	<b>Identification of salient concerns:</b> Describe how the salient human rights issues were determined, including any input from stakeholders	<i>The above risks have been identified by EcoCitizen's management team.</i>
B3	<b>Choice of main geographical areas:</b>	<i>Luxembourg is the Group's main geographic zone</i>

	<b>If your report on salient human rights issues focuses on particular geographical areas, explain how this choice was made</b>	<i>because of the activities carried out there.</i>
<i>B4</i>	<b>Other serious implications: declare any serious human rights implications that have arisen or are still being dealt with during the reporting period that do not relate to salient human rights issues, and explain how they have been managed</b>	<i>NA</i>
<b>Progress plan to be undertaken for B</b>		

PART C: MANAGING KEY HUMAN RIGHTS ISSUES

[Part C is optional for new 2024 signatories.]

According to **Principle 19 and 20** of the UN Guiding Principles on Business and Human Rights, to prevent and mitigate adverse human rights impacts, companies should consider the results of their impact assessments across all relevant internal functions and processes and take appropriate action. To verify whether negative human rights impacts are being addressed, companies should monitor the effectiveness of the measures they have taken.

SPECIFIC POLICIES

UNGP	Information and objectives	Answers <i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
C1	Does your company have specific policies in place to deal with salient human rights issues, and if so, which ones?	<i>In 2023, initiatives were taken to develop human rights policies and, in 2024, an employee code of conduct was introduced.</i>
C1.1	How does your company communicate the relevance and importance of these policies to those who have to implement them?	<i>Important policies are listed on the company website and communicated to employees when they are hired.</i>
Progress plan to be undertaken for part C1		

## ENGAGING WITH STAKEHOLDERS

UNGP	Information and objectives	Answers <i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
C2	<b>What is your company's approach to stakeholder engagement for each salient human rights risk?</b>	<i>In line with internal policies, the company's management team periodically identifies stakeholder groups, their needs and expectations, and the human rights issues likely to affect them.</i>  <i>Based on this information, it is decided how each group will be involved in the issue.</i>
C2.1	<b>How does your company identify the stakeholders with whom it collaborates on each salient issue, and what is the timing and nature of this collaboration?</b>	<i>Once each stakeholder group has been identified and properly involved, the company decides with whom to collaborate, based on the current situation.</i>  <i>Every collaboration is different, and the timing and nature depend on factors such as the size, type and involvement of the organization; thus, it can range from a few weeks to several years, from one-off activities to research development, and so on.</i>
C2.2	<b>During the reporting period, with which stakeholders did the company engage with on each salient issue, and what were the reasons for this collaboration?</b>	<i>In terms of collaboration, the main stakeholders were customers and R&amp;D partners.</i>  <i>These groups are important for human rights management within the company, as they constantly provide new information on the subject, on any concerns they may have, on how to deal with potential problems, on any new issues that may arise, among other aspects that need to be constantly monitored.</i>
C2.3	<b>During the reporting period, how have stakeholder opinions influenced the company's understanding of each salient issue and/or the way it manages them?</b>	<i>Stakeholders' opinions, knowledge and concerns influence the company's understanding and management of human rights issues, as they often present information that can be integrated into the decision-making process.</i>  <i>For example, when a customer expresses a concern about human rights within the company or its activities, the company analyzes the information and takes action accordingly; the knowledge gained is then integrated and used to facilitate future assessments, problem detection,</i>

		<i>action-taking, etc.</i>
<p><b>Progress plan to be undertaken for part C2</b></p> <p>EcoCitizen's progress plan for stakeholder engagement focuses on open communication with stakeholders about any human rights issues that concern them. It is crucial to ensure that their voices are valued and that they are given the opportunity to have their say. This collaborative process will be implemented when EcoCitizen experiences its first human rights issue as a company.</p>		

## IMPACT ASSESSMENT

UNGP	Information and objectives	<b>Answers</b> <i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
<i>C3</i>	<b>How does your company identify changes in the nature of each salient human rights issue over time?</b>	<i>This process involves keeping abreast of emerging trends, maintaining an ongoing dialogue with all those who interact with the company, and assessing responsiveness to political developments.</i>
<i>C3.1</i>	<b>During the reporting period, were there any notable trends or patterns observed in relation to any of the salient issues, and if so, which ones?</b>	<i>NA ARTIFICIAL INTELIGENCE</i>
<i>C3.2</i>	<b>During the reporting period, did your company identify any serious incidents related to a salient issue and, if so, which ones?</b>	<i>NA</i>
<p><b>Progression plan to be undertaken for part C3</b></p>		

## INTEGRATION OF RESULTS AND RESPONSES

By identifying actual and potential impacts, you will be able to adequately prioritize your resources to prevent, mitigate and remedy negative impacts on human rights. Establishing an adequate governance structure to ensure that responsibility is assigned to the appropriate authority and department, and that sufficient resources are available to implement measures, is essential for successful integration into business practices.

UNGP	Information and objectives	Answers <i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
C4	<b>How does your company integrate its findings on each salient human rights risk into its decision-making processes and actions?</b>	<i>Through risk analysis, EcoCitizen is dedicated to reviewing policies, implementing specific initiatives and directing resources to minimize risks. Integrating human rights into decision-making processes confirms our commitment to ethics and positive social change.</i>
C4.1	<b>How are company departments whose decisions and actions may affect the management of salient risks involved in finding and implementing solutions?</b>	<i>Throughout the process of dealing with human rights issues, the management team is responsible for resolving any problems that arise.</i>
C4.2	<b>In cases where tensions arise between the prevention or mitigation of impacts associated with a critical risk and other corporate objectives, how are these tensions managed?</b>	<i>When tensions arise, it's important to analyze priorities. First and foremost, ethical behavior and a commitment to protecting human rights come first. All Ecocitizen's business objectives can and are achieved within the framework of these priorities. Internal dialogue mechanisms are activated, with mediators identified internally, or from trusted external partners, including accredited mediators. The company also has a governance structure which includes a board made up of the core founding team, and the day-to-day management, which enables the taking of strategic decisions even in difficult conditions.</i>
C4.3	<b>During the reporting period, what measures did the company implement to prevent or mitigate the potential impacts attributable to each salient issue?</b>	<i>When a potential impact is detected, the management team develops measures to mitigate the immediate consequences, if necessary. For medium- and long-term impacts, it also draws up a specific plan on the subject; this plan depends on the situation but may include audit programs to assess suppliers, participation in related</i>

		<i>initiatives, stakeholder engagement, among others</i>
<p><b>Progress plan to be undertaken for part C4</b></p> <p>It's important to EcoCitizen that human rights always come first. It is essential to keep this in mind if we are faced with a serious problem in the future. Our actions will speak loud and clear about our priorities, and we promise to put ethics first. It's largely thanks to our proactivity and our corporate culture in this area that we've had no human rights issues whatsoever. We absolutely intend to maintain this standard of human rights valorization in the future.</p>		

## PERFORMANCE MONITORING

According to the UN **Guiding Principle 21** on business and human rights, in the interests of reporting on how companies are addressing their human rights impacts, they have to be prepared to disclose information externally, particularly when concerns are raised by or on behalf of stakeholders

UNGP	Information and objectives	Answers
		<i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
C5	How does your company know whether its efforts to address each key human rights issue are effective in practice?	<i>Due to its small size and start-up status, EcoCitizen has not yet produced a voluntary report on the basis of ESRS or GRI. Nevertheless, the nature of our business and our in-house expertise, including GRI certifications, in these and others statutory and voluntary reporting frameworks and standards enable us to adopt relevant performance indicators in the short term, as well as the necessary management processes and controls.</i>
C5.1	During the reporting period, what are some examples of effective management of salient issues?	NA
<p><b>Progress plan to be undertaken for C5</b></p>		



## REPARATION

According to **Principle 29**, the UN Guiding Principles on Business and Human Rights, for grievances to be addressed promptly and be subject to direct remedial action, business enterprises should establish or participate in effective grievance mechanisms at the operational level for individuals and communities likely to be adversely affected. An effective grievance mechanism is a crucial tool for the subsequent identification of negative human rights impacts, as it enables you to identify potential negative human rights impacts in a timely manner. It can also help build good relations with your stakeholders, as it shows that you are aware and serious about the fact that negative impacts can occur despite the processes in place, and that there is a proactive attitude to rectifying them if they do occur

UNGP	Information and objectives	Answers <i>[Please enter your answers in this column. The examples in grey are for inspiration only.]</i>
C6	<b>What is your company's approach to providing an effective remedy if people are harmed by its actions or decisions affecting salient human rights aspects?</b>	<p><i>The HR-01 formal procedure dictates how the company deals with human rights issues, including the design of a solution (if it is established that human rights have been violated) and the effectiveness of this process, whether or not the complaint demonstrates a human rights violation.</i></p> <p><i>There is also a direct contact form on the website where issues can be raised.</i></p>
C6.1	<b>Via what means can your company receive complaints or claims related to each salient topic?</b>	<i>Complainants can access the company's web page, where they will find a "contact" section; this is how the company receives information such as human rights complaints</i>
C6.2	<b>How does your company ensure that people feel able and empowered to make a complaint or claim?</b>	<i>The company openly promotes and makes available a free and public channel for complaints or claims, guaranteeing that it will evaluate them and inform the complainant(s) and stakeholders of the results.</i>
C6.3	<b>How does your company deal with complaints and evaluate the effectiveness of the solutions?</b>	<i>The HR-01 formal procedure dictates how the company deals with human rights issues, including the design of a solution (if it is established that human rights have been violated) and the effectiveness of this process, whether or not the complaint demonstrates a human rights</i>

		<i>violation.</i>
C6.4	<b>During the reporting period, what trends and patterns characterized complaints or claims and their resolutions on each of the salient topics, and what insights has the company gained?</b>	<i>No complaint has been lodged</i>
C6.5	<b>During the reporting period, did your company offer or facilitate remedies for actual incidents related to a salient issue? If so, can you provide representative examples?</b>	<i>NA</i>
<b>Progress plan to be undertaken for part C6</b>		