

Towards a mandatory EU system of due diligence for supply chains

SUMMARY

The growth of international supply chains has undoubtedly brought enormous benefits to developing countries, but at the same time it has had certain negative impacts, relating for instance to violations of human and labour rights, including forced labour and child labour, environmental damage, land grabbing, and corruption. Multinational companies have gained unprecedented power, creating asymmetries in relation to weak regulation and enforcement in developing countries.

For several decades, multinational companies have been encouraged to take responsibility for their supply chains on a voluntary basis. Whereas in some sectors, where violations have been most egregious, particularly in the extractive industries or in timber extraction, mandatory frameworks have already been adopted at EU level, for others it was hoped that the voluntary approach, guided by several international frameworks, would suffice.

The evidence available, however, from academic research, civil society organisations, implementation of the EU Non-financial Reporting Directive, and studies commissioned by the EU institutions, has made it clear that the voluntary approach is not enough. Against this background, many voices consider that the EU should adopt mandatory due diligence legislation. Human rights and the environment stand out as two areas where such legislation would be both most needed and most effective.

Beyond its expected intrinsic positive impact, such legislation would have important advantages, such as creating a level playing field among all companies operating on the EU market, bringing legal clarity, and establishing effective enforcement and sanction mechanisms, while possibly improving access to remedy for those affected, by establishing civil and legal liability for companies.

The European Commission has undertaken some preliminary steps, including publishing a study and conducting public consultations, towards a possible legislative initiative on mandatory due diligence. Its 2021 work programme includes a proposal for a directive on sustainable corporate governance that would also cover human rights and environmental due diligence.



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Introduction

The idea that multinational companies should make efforts to increase their positive impact and minimise their negative effects on host communities and their sustainable development has been around for several decades.¹ As a consequence of globalisation, multinational companies have 'gained unprecedented power and influence across the world'.² This enables them to avoid liability for their harmful impacts on local communities either by hiding behind the 'corporate veil' (when they act through subsidiaries and companies they control) or by exploiting weak and poorly enforced domestic regulation in developing countries, or by [abusing](#) the international investors' protection system. In other cases, the development of global supply chains has unintended harmful effects, such as when independent local suppliers enter into a race to the bottom to secure their share of the market. Such was tragically the case when the [Rana Plaza factory collapse](#) in Bangladesh in 2013 killed over 1 000 people. Negative impacts of this kind, ranging from [environmental disasters](#) and [land grabbing](#) to serious [violations](#) of labour and human rights, are often in the news.

This does not mean however that the local impact of multinational companies is always harmful. The situation is much more complex,³ as not all multinational enterprises are the same, and many actually drive development and create jobs, and also have important positive effects on human and labour rights. They can be more respectful of human rights than local companies, as a [survey](#) of workers in Mexico has for instance shown, and can enhance labour standards. Even if the primary authority for enforcing human and labour rights or environmental norms resides with national governments, multinational companies could still do more to [prevent](#) harmful direct and indirect impacts of their activities, e.g. by improving transparency regarding their local suppliers and working together with them to improve human and labour rights compliance.

The preferred approach to encouraging multinational companies to step up to this role has until now been based on voluntary action. It was expected that multinational companies would voluntarily conduct due diligence in order to avoid reputational damage and improve their standing with workers and customers. Several international frameworks have been established as guidance, to encourage multinational companies to prevent negative human rights impacts, and when they occur to mitigate and remedy them.

In 2011, the United Nations Human Rights Council unanimously endorsed the [Guiding Principles on Business and Human Rights](#) (UNGPs) establishing the first global framework outlining the duties and responsibilities of governments and business enterprises, to prevent, address and remedy the impacts of globalised business activity on human rights. The UNGPs are based on three pillars that outline how states and businesses should implement them:

- Pillar I: The state duty to protect human rights
- Pillar II: The corporate responsibility to respect human rights
- Pillar III: Access to remedy for victims of business-related abuses.

Of the 31 guiding principles outlined, principles 17 to 21 refer to the human rights due diligence to be conducted by companies. Academics and civil society organisations have criticised the UNGPs on account of their voluntary nature,⁴ showing that most companies do not voluntarily undertake human rights due diligence. Recognising the fact that the voluntary approach promoted by the UNGPs is insufficient, international negotiations in the UN framework on the drafting of an international binding treaty on business and human rights have started. According to the [current stage of negotiations](#), the draft treaty puts mandatory due diligence of the heart of its approach. It requires 'State Parties [to] adopt measures necessary to ensure that all persons conducting business activities, including those of transnational character, to undertake human rights due diligence'.

The [OECD Guidelines for Multinational Enterprises](#) (2011 update) and the International Labour Office's [ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#) (2017 update) also set voluntary standards for companies regarding due diligence. The OECD Guidelines, which are backed by [44 governments](#) mainly from developed countries, is the only

instrument to outline business responsibility for all relevant thematic areas, including human rights and labour rights, as well as information disclosure, the environment, bribery, consumer interests, science and technology, competition, and taxation. They were initially drafted in 1976 and have been revised several times. The last update introduced a new human rights chapter in line with the UN Guiding Principles on Business and Human Rights and a new approach to due diligence and responsible supply chain management.

The coronavirus crisis⁵ has had a profoundly disturbing effect on global value chains. This creates renewed urgency but also new opportunities for strengthening human rights and environmental due diligence by multinational companies. The crisis has revealed the fragility of global supply chains, which have been seriously disrupted due to travel restrictions, lockdowns forcing factories to stop their activities and other restrictive measures related to the crisis. Reliance on geographically distant supply chains has also proved to be a major vulnerability in the light of the medical equipment crisis. All this has had a severe effect on workers and local communities, particularly in developing countries, where many jobs have been lost. Such massive pressure on labour markets risks degrading labour standards and work safety even further. The crisis is therefore driving a deep restructuring of global supply chains that could provide a good opportunity to make them more sustainable.

There are signals that the Commission is moving towards proposing a mandatory due diligence system at EU level. It recently published a study on [due diligence requirements through supply chains](#) that reveals that the voluntary approach is insufficient. At a high-level webinar hosted by the European Parliament's Responsible Business Conduct Working Group in April 2020, EU Commissioner for Justice Didier Reynders [announced](#) that the Commission had started [consultations](#)⁶ on the renewed sustainable finance strategy, which also included due diligence and could provide the 'main lines' for a possible legislative initiative to make human rights and environmental due diligence in international supply chains mandatory for EU enterprises. According to [Reynders](#), such an initiative would be intrinsically linked to the Green Deal as a central component of sustainability. The Commission [2021 work programme](#) includes a legislative proposal for a directive on sustainable corporate governance to be published in the fourth quarter of 2021. According to the [inception impact assessment](#), the issues to be regulated include a duty of environmental and human rights due diligence in companies' own operations and value chains.

In a [resolution of 17 April 2020](#) on EU coordinated action to combat the Covid-19 pandemic and its consequences, the European Parliament expressed its conviction 'that corporate human rights and environmental due diligence are necessary conditions in order to prevent and mitigate future crises and ensure sustainable value chains'.

Existing EU legislation and other initiatives: Lessons learnt

The EU has adopted binding legislation and voluntary initiatives to address human rights and environmental violations in the sectors traditionally worst affected, such as the extractive industries, timber, garment and leather industries. The EU has also been actively involved in international initiatives, such as the [Kimberley process](#), to stop the trade in 'blood diamonds' (diamonds extracted

European Green Deal and due diligence

The European Green Deal commits to link all EU actions and policies under environmental objectives and exploit their synergies. It addresses the need to avoid relocating harmful environmental impacts of certain industries outside the EU's borders. The Green Deal places central emphasis on people and sustainability.

The Green Deal is an integral part of the EU's efforts to implement the United Nation's sustainable development goals. Human rights and due diligence can be important and effective tools for achieving these goals.

The Green Deal outlines the Commission's commitment to the transformation of global value chains, by promoting new standards for sustainable growth.

Source: [The European Green Deal](#).

by armed groups and traded to finance deadly conflicts), as well as in OECD efforts to design guidance for various sectors.⁷

Conflict minerals regulation

Certain valuable metals and metal ores have driven conflict in their areas of extraction and even beyond, particularly in Central Africa, enabling rebel groups to finance military operations. They are thus considered potentially responsible for severe human rights violations, affecting miners and, more broadly, local communities. These products end up in electronic products, such as mobile phones or car components, used in the EU on a daily basis. To stop these abuses, in May 2017, after a [complex legislative process](#) in which Parliament proposed important changes to the initial text drafted by the Commission, establishing a compulsory certification scheme (rather than voluntary self-certification), the European Union adopted [Regulation \(EU\) 2017/821](#). The Regulation lays down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. EU importers of tin, tantalum, tungsten and gold must check that the minerals or metals they buy do not contribute to conflict, forced labour or other illicit activities. The regulation requires importers to follow the five-step framework established by the OECD:⁸

- establish strong company management systems;
- identify and assess risk in the supply chain;
- design and implement a strategy to respond to identified risks;
- carry out an independent third-party audit of supply chain due diligence;
- report yearly on supply chain due diligence.

The EU regulation will enter into force in January 2021 and the Commission is preparing its implementation. While its impact cannot yet be assessed, similar US legislation (Dodd-Franck Act Section 1502, see chapter below on legislation at national level) has engendered substantial [controversy](#) regarding unintended negative effects. The negative effects of the application of the US legislation highlighted by some researchers include 'the loss and displacement of the mineral trade from communities, said to support between 8-10 million people' causing poverty and infant mortality to increase, as well as the 'creation of monopolies in the form of mining cooperatives ... under the control of local strongmen, but also [of] international actors', driving wages down. The extent of such harmful effects is however disputed by other [researchers](#), who point to the positive impact. Further concerns refer to the possible [relocation](#) of extraction activities to other countries, with a potentially severe socio-economic effect on local communities.

Timber Regulation

[Regulation \(EU\) No 995/2010 of the European Parliament and of the Council of 20 October 2010](#) laying down the obligations of operators who place timber and timber products on the EU market entered into force in March 2013. It takes measures to stop the trade in illegally harvested timber and timber products. The regulation applies to both imported and domestically produced timber and timber products. It requires EU traders who place timber products on the EU market for the first time to exercise 'due diligence'. Under the regulation, [due diligence](#) refers to a system of measures and procedures to minimise the risk of placing illegally harvested timber and timber products derived from such timber on the internal market. The due diligence system includes three elements inherent to risk management: access to information about the origin of wood, risk assessment, and mitigation of the risk identified. Enterprises selling or buying timber already on the EU market have to keep records that trace the origin of the wood. Timber or timber products carrying certain certifications (valid [FLEGT licence](#) or [CITES permit](#)) are automatically considered to comply with the requirements of the regulation.

The regulation could provide a source of inspiration for a system of enforcement and sanctions for a mandatory cross-sectoral system of due diligence. It considers the non-fulfilment of the due diligence obligation by operators an offence even if the traded timber is legal. It leaves to Member

States the task of applying penalties that are 'effective, proportionate and dissuasive', giving some examples, such as proportionate fines, seizure of the timber and timber products concerned, or immediate suspension of authorisation to trade. [Penalties](#) already imposed in certain Member States include blocking suspect shipping of timber from Myanmar or the Gambia, as well as fines imposed on operators in France and Belgium.

EU Non-financial Reporting Directive (NFRD)

[Directive 2014/95/EU](#) requires large companies from 2018 onwards to publish information⁹ on the policies they implement in relation to environmental protection, social responsibility and treatment of employees, respect for human rights, anti-corruption and bribery, and diversity on company boards, including on due diligence procedures throughout the supply chain with a view to addressing existing and potential negative effects. The NFRD does not impose a legal obligation on EU companies to undertake human rights due diligence; however if they do, they are required to provide information on it. It also requires them to give the reasons why they do not undertake it, if that is the case. The Commission has [indicated](#) the first quarter of 2021 as target date for the review¹⁰ of the Non-financial Reporting Directive in 2020. Between February and June 2020, the Commission held a [public consultation](#) in this respect.

According to civil society organisations, there are serious shortcomings¹¹ with the implementation of this directive: more specifically, companies fail¹² to report properly on their human rights risks, impacts and due diligence, while the national competent authorities are not fulfilling their supervisory and enforcement role adequately.¹³ These findings reveal that the voluntary due diligence approach is insufficient.

EU voluntary approaches with third countries

The EU has also promoted voluntary approaches with a focus on specific sectors, namely the garment, textile and leather industry,¹⁴ with the main objective of fostering improvements in the medium- to long-term in environmental impacts and working conditions in producing countries. The approach adopted by the Commission, as outlined in the staff working document (SWD) '[Sustainable garment value chains through EU development action](#)', involves extensive development cooperation with the countries concerned as well as the provision of development aid to various projects in the area. According to the SWD, there is 'a large number of EU financed projects and programmes in direct support of more sustainable garment, textiles, and related supply chains across partner countries such as Bangladesh, Cambodia, India, Lesotho, Madagascar, Myanmar, Pakistan and Vietnam'. For example, the ongoing (2019-2020) [Trade for Decent Work Project](#) jointly established and managed by the EU and the International Labour Organization (ILO) aims at improving application of ILO fundamental conventions and working conditions in EU trading partner countries. The project has started with Bangladesh, Myanmar and Vietnam. Although the primary focus is not on improving due diligence by EU-based multinational enterprises, it does contribute to this through its awareness-raising on labour and human rights, and efforts to strengthen responsible value chains and improve and supply chain transparency and traceability.¹⁵

Due diligence legislation at national level

There are several examples of mandatory due diligence legislation in EU and non-EU countries, but they focus on specific sectors (extractive industries – [US 2010 Dodd-Frank Act Section 1502](#)) or on particular human rights violations, such as child labour ([Dutch law](#)) or forced labour (United Kingdom 2015 [modern slavery law](#)). The only national legislation to adopt a cross-sectoral approach is the [French 2017 law on the duty of vigilance](#), which requires all large French companies (with over 5 000 employees in France and over 10 000 in the world) to undertake due diligence with regard to the companies they control, and all their contractors and suppliers. The French law requires companies to develop a vigilance plan in consultation with trade unions. Companies that do not fulfil their due diligence obligations are liable to sanctions and payment of damages. The plans

should contain a mapping of risks, regular risk assessment procedures, mitigation and prevention actions, an alert mechanism and a monitoring mechanism. A [recent assessment](#) (February 2020) by the French government of the application of the law found that whereas some companies have made real progress, others do not yet apply the law effectively. Companies can be held civilly liable if they do not comply with the law, but the fines initially provided for in the draft law have been invalidated for reasons of unconstitutionality.

In numerous other EU Member States, there are various civil society [initiatives](#) as well as legislative proposals calling for mandatory due diligence.

The need for binding legislation

While, as explained above, for minerals and timber the EU enforces strict due diligence obligations at cross-sectoral level, alongside the obligations of disclosure provided for in the NFRD, the EU has until now followed the voluntary approach proposed by the international frameworks, mainly the UNGPs, with respect to human rights due diligence. This approach is considered largely insufficient.

Academic [research](#) has shown that voluntary corporate tools that implement due diligence have not been sufficiently effective at securing respect for rights. Various [civil society organisations](#) have presented similar findings. The [2019 Corporate Human Rights Benchmark](#), which assessed and ranked 200 of the largest listed companies from high-risk sectors (agricultural products, apparel and extractives and information and communications technology manufacturing) found that 'in aggregate, the 200 companies are painting a distressing picture; most companies are scoring poorly and the UN Guiding Principles on Business and Human Rights (UNGPs) are clearly not being implemented. That one quarter of companies score less than 10 % and a full half of companies fail to meet any of the five basic criteria for human rights due diligence should alarm governments and investors'. According to a study commissioned by the Commission's Directorate-General for Justice and Consumers (DG JUST),¹⁶ among the companies interviewed, only 37 % conduct due diligence related to human rights (and in only 16 % of the cases, does their due diligence cover the entire supply chain), while another 33 % undertake due diligence only in certain areas (for example health and safety, labour, non-discrimination and equality, environment, land rights and indigenous communities). According to the [results](#) of a survey of larger German companies conducted by the Federal Foreign Office, only 22 % of German businesses voluntarily monitor their foreign subsidiaries and contractors for human rights compliance. These results are [expected](#) to trigger the drafting of German federal legislation on mandatory due diligence, according to the governing coalition agreement.

Taking into account the fragmentation of international guidance that the EU follows, EU cross-sectoral legislation on mandatory due diligence would establish a single standard of care even if it should allow for a sector-sensitive approach. Currently, there is a lack of conceptual and legal clarity on due diligence processes, with companies applying varying and even divergent approaches. The voluntary approach does not guarantee a level playing field and can create competitive disadvantages for companies that do undertake due diligence. According to the study ordered by the Commission, business interviewees indicated a level playing field and legal certainty as the most important considerations of a mandatory due diligence approach. Another potential benefit is that it could address the lack of access to remedies for parties harmed by EU companies by establishing civil or even penal liability in the event that they do not comply.

Potential difficulties created by such legislation can be extrapolated from debates on existing sectoral and national legislation. One concern is that some companies will not comply or will comply only formally, as revealed by the French Government assessment report mentioned above. [Data](#) on US companies' compliance with Section 1502 of US Dodd Frank Act are not encouraging either, although this is also the result of efforts by the current US administration to undermine the act.

Another concern is that EU-based companies would be put at competitive disadvantage towards other companies. One way to address this would be to oblige all companies active on the EU market to respect due diligence requirements, as for the protection of personal data. [This concern](#) has also

been expressed in relation to the existing Conflict Minerals Regulation, as operators wanting to import to the EU market from such areas could face higher costs and greater risk of litigation.

European Parliament position

The European Parliament has long been advocating a stronger legal framework to oblige EU companies to take up their responsibility towards human rights and environmental norms in international supply chains. Parliament has called for sector-specific due diligence to be adopted for the garment industry. Parliament's [resolution of 27 April 2017 on the EU flagship initiative on the garment sector](#) called on the EU to go beyond voluntary initiatives, which are not effective enough to address human rights and labour rights violations in the sector. Parliament considered that the Commission should propose binding legislation on due diligence obligations for supply chains in the garment sector. The legislative proposal should take into account the relevant standards at international level, primarily the relevant OECD guidance for the sector, released in February 2017. In its [resolution of 11 September 2018](#) on transparent and accountable management of natural resources in developing countries: the case of forests, it asked that mandatory due diligence by both upstream and downstream operators in supply chains be extended to cover forest-risk commodities, such as soy, palm oil, eucalyptus, beef, leather and cocoa.

In its own initiative [resolution on sustainable finance](#) of May 2018, Parliament called on the Commission to present a legislative proposal on 'an overarching, mandatory due diligence framework including a duty of care to be fully phased-in within a transitional period and taking into account the proportionality principle'.

In its August 2018 [resolution on the EU's input to a UN binding instrument on transnational corporations and other business enterprises with transnational characteristics with respect to human rights](#), Parliament expressed support for mandatory due diligence legislation. It was of the opinion that the new international instrument should impose on states 'the obligation to adopt regulatory measures requiring companies to apply human rights due diligence policies and procedures' and proposed that 'this obligation should be enforced by means of companies being accountable in either the forum where the harm was caused, or the forum where the parent company is incorporated or where it has a substantial presence'.

Stakeholder positions

Civil society is strongly in favour of cross-sectoral mandatory legislation on due diligence for EU companies. Over [100 civil society organisations](#) from Europe and other regions have called on the EU to adopt human rights and environmental due diligence legislation, considering that 'the voluntary approach to promote business respect for human rights and the environment has proven insufficient and does not prevent violations of human rights and environmental damages'.

Labour unions have also come out in favour of mandatory legislation. The European Trade Union Confederation (ETUC) [calls](#) for a European directive on mandatory human rights due diligence and responsible business conduct, which should cover companies' activities and their business relationships, including their supply and subcontracting chains and should provide for 'effective remedies and access to justice ... available for victims, including trade unions', and for liability for companies.

The position of European businesses is less clear at this point. Many of those interviewed for the DG JUST study were in favour of a uniform EU regulatory approach, indicating a level playing field and legal certainty as among the most important considerations. According to a [Financial Times article](#), German companies have indicated that they are in favour of a uniform standard at EU level rather than a fragmented national approach that would put them at a disadvantage on the EU market. A [group](#) of international investors has called on governments to put in place regulatory measures requiring companies to conduct human rights due diligence in relation to their business activities.

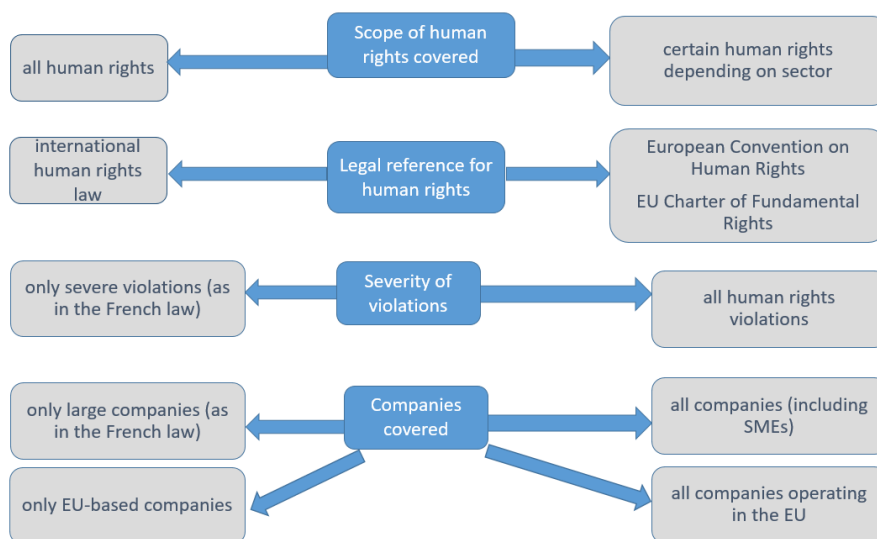
Outline of possible EU legislation

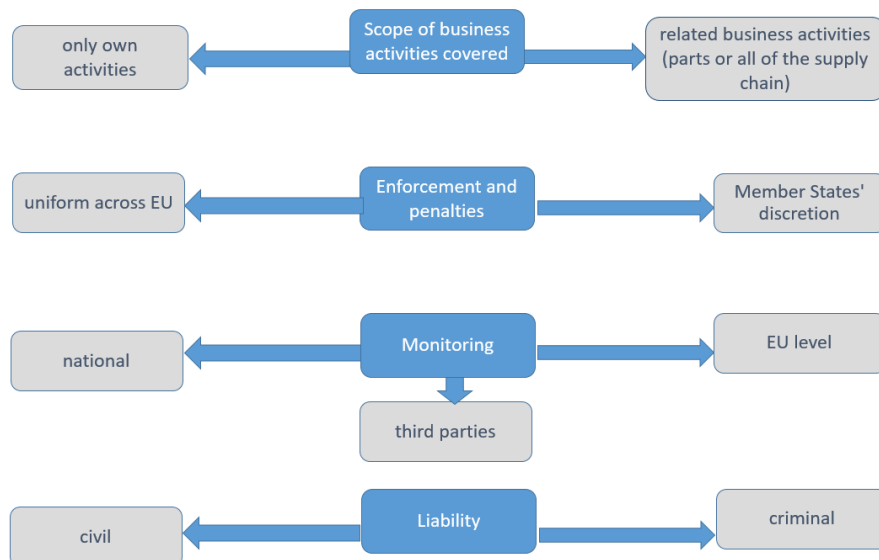
An external study for the European Commission, published in February 2020 (see main references), explores different options for improving companies' due diligence efforts, including new voluntary guidelines, new reporting requirements that go beyond those outlined by the Non-financial Reporting Directive, and mandatory due diligence as a legal standard of care. According to the study, under the last option, which was preferred by the companies taking part in the survey, 'a mandatory due diligence requirement at EU level would require companies to carry out due diligence to identify, prevent, mitigate and account for actual or potential human rights and environmental impacts in its own operations or supply chain ... This duty would require companies to meet a certain standard of care of due diligence for the human rights and environmental impacts in their own operations and supply chains (or value chains).¹ Due diligence would be understood as a substantive duty rather than pure compliance with formal requirements and would involve a flexible approach depending on sector of activity and company type and size. It should however ensure a level playing field among companies and legal certainty.

Options for legislation

The studies commissioned by the Commission and Parliament (see main references) identify several options for future legislation. The options presented below in graphic form do not necessarily exclude each other and can in certain cases be combined.

Figure 1 – Options for a possible EU law on due diligence





Source: EPRS.

MAIN REFERENCES

[Substantive Elements of Potential Legislation on Human Rights Due Diligence](#), Policy Department for External Relations, European Parliament, April 2020.

[EU Human Rights Due Diligence Legislation: Monitoring, Enforcement and Access to Justice for Victims](#), Policy Department for External Relations, European Parliament, April 2020

[Study on due diligence requirements through the supply chain](#), external study for the European Commission, February 2020.

ENDNOTES

¹ The [OECD Declaration on International Investment and Multinational Enterprises](#) together with the OECD Guidelines for Multinational Enterprises were [adopted in 1976](#) and have subsequently been revised several times (1979, 1984, 1991, 2000 and 2011).

² See e.g. [Amnesty International – Corporations](#) on this issue.

³ According to an ILO research paper by J. Lee, [Global supply chains dynamics and labour governance and labour dynamics](#): 'How labour conditions and workers' rights in developing countries are affected by economic globalization, or increased cross-national flows of goods, capital, and people, and how MNEs, states, and other actors shape the relationship has been under intense debate'.

⁴ See European Parliament, DG External Policies, [Implementation of the UN Guiding Principles on Business and Human Rights](#), External Study, 2017.

⁵ On this subject, see the following sources used for drafting the paragraph:

[How COVID-19 is changing global value chains](#), UNCTAD, September 2020.

[COVID-19 and global value chains: Policy options to build more resilient production networks](#), OECD, June 2020.

[COVID-19 and global supply chains: How the jobs crisis propagates across borders](#), ILO Policy brief, June 2020.

⁶ The consultation included questions such as:

Question 47: Do you think that an EU framework for supply chain due diligence related to human rights and environmental issues should be developed to ensure a harmonised level playing field, given the uneven development of national due diligence initiatives?

Question 48: Do you think that such a supply chain due diligence requirement should apply to all companies, including small and medium sized companies?

⁷ See [OECD Guidelines for Multinational Enterprises](#); for due diligence guidance by sector – [minerals; extractive; garment and footwear; agriculture; institutional investors; child labour](#); for general guidance [OECD Due Diligence Guidance for Responsible Business Conduct](#).

⁸ OECD, [Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas](#), see also European Commission Conflict Minerals Regulation [explainer](#).

- ⁹ European Commission [web page](#) on non-financial reporting.
- ¹⁰ To follow the review process, see European Parliament Legislative Train on the review of the non-financial reporting directive.
- ¹¹ See European Coalition for Corporate Justice (ECCJ) [report](#).
- ¹² A 2019 [study](#) by the European Alliance for Corporate Transparency showed that while 90 % of the European companies surveyed expressed a commitment to respect human rights, only 36 % described their human rights due diligence system (but not always according to the UNGP reporting standard). The same study found that 19 % of companies had no description of the risks their operations posed to human rights; 48 % had a 'vague' description; while only 26 % had a clear statement of salient issues.
- ¹³ See also European Coalition for Corporate Justice (ECCJ) [report](#).
- ¹⁴ Commission staff working document, [Sustainable garment value chains through EU development action](#), April 2017.
- ¹⁵ As the SWD states, 'Traceability is considered one essential step for companies in performing due diligence throughout their global supply chain'.
- ¹⁶ DG JUST, [Study on due diligence requirements through the supply chain](#), February 2020.

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