

Business & Human Rights Resource Centre Survey Questions

Tech companies operating in the Occupied Palestinian Territory and/or Israel¹

I. Nature of involvement:

The UNGPs stipulate that every company has a responsibility to respect human rights and require companies to undertake a human rights due diligence process to identify, prevent and mitigate their impact in their own activities or through their business relationships. Therefore, this section is concerned with the first step of identifying the nature of the company's involvement and operations.

- 1) How long has your company or subsidiary been operating in the Occupied Palestinian Territory and/or Israel? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations?
 - Ericsson is a global supplier of telecommunications infrastructure with operator customers in approximately 180 countries including Israel and the State of Palestine. Ericsson is a supplier to customers in Israel since 1997 and in the State of Palestine since 1998. Ericsson offices are located in Tel Aviv and Ramallah. The company has no operations or employees present in the Gaza strip.
- 2) Has your company or its subsidiary contributed financial, material, or technological support to state or non-state parties to the conflict in the Occupied Palestinian Territory and/or Israel in any manner?
 - As a supplier of telecommunications infrastructure Ericsson typically has long-term contracts that span over several years and includes providing technical support and spare parts to the customers. New deployment and expansion of network capacity or coverage typically requires additional equipment to be deployed. For more details about the networks as such, we refer to our customers.

II. Assessing risks and heightened human rights due diligence:

To fulfil their responsibility to respect human rights, the UNGPs, in Principles 16, 17 and 18 require companies express their human rights commitment through a public, informed policy statement; and conduct ongoing human rights due diligence based on meaningful consultation to assess actual and potential human rights impacts. Further [guidance by OHCHR](#) calls for heightened due diligence proportional to the heightened risks in conflict-affected areas.

- 3) How is your company enhancing its human rights due diligence to identify, prevent, and mitigate heightened or salient human rights risks and comply with international humanitarian law in the context of this conflict?
 - Ericsson follows the same procedure as for all potential engagements and existing engagements, the Sensitive Business framework. The process identifies human rights risks related to the country and customer, as well as the technology and purpose of the engagement. As part of that process, the presence of conflict is a factor that is taken into account.

¹ Occupied Palestinian Territory includes East Jerusalem, the West Bank, and the Gaza Strip.

- Moreover, the Sensitive Business process also exists to, for example, raise human rights concerns in relation to existing engagements (irrespective of a pending sales opportunity). This may happen in instances of recent civil society reporting, internal information or external events (such as armed conflicts). In this case, the conflict in Gaza and its implications for the overall analysis of human rights risks has been a catalyst for further due diligence, and a closer look at Ericsson's presence in the region and the related potential impacts.
 - The primary focus in any ongoing armed conflict is the security of our personnel. Ericsson has a limited number of employees in Israel and the State of Palestine, i.e. West Bank, and no presence or employees in Gaza. As a global company, Ericsson is using its own security resources as well as external partners to continuously assess the situation in conflict areas and take security measures accordingly. The general security situation in the region remains unpredictable and we monitor the situation closely.
- a) Does your company have a policy on conducting human rights due diligence and heightened human rights due diligence in the context of conflict?
- Ericsson does not have a standalone policy on conducting human rights due diligence in relation to operations in conflict-affected areas. Conflict is, however, an important factor in relation to the identification and assessment of human rights impacts across Ericsson's value chain and an aspect that is included in overall human rights due diligence.
- b) What resources or guides is your company relying on to inform its approach to due diligence in respect of this conflict?
- Ericsson generally follows reporting from reputable sources, including news media, civil society organizations, and international organizations.
 - Ericsson looks towards UN guidance on heightened human rights due diligence to inform its activities in conflict-affected environments.
 - Ericsson engages on the topic of heightened due diligence in conflict-affected areas within the Global Network Initiative (GNI), and together with invited non-GNI stakeholders, benefitting from the vast experience of a range of stakeholders, including other businesses, civil society organizations, academics and individual experts, and responsible investors.
- 4) Has your company identified and assessed actual or potential adverse impacts on the conflict that your company may cause or contribute to through its operations, or which may be directly linked to its operations, products, or services? If so, what were the impacts or risks identified?
- Ericsson follows a standardized process for assessing the full range of potential impacts of its engagements, called the Sensitive Business process, which takes four primary risk factors into account: country, technology, customer and purpose.
 - In light of the conflict, Ericsson has reviewed existing engagements and operations and has identified the security of personnel to be the most salient risk, and the top priority.
 - As a network infrastructure vendor, acting as a supplier to national mobile operators who are the entities that run and operate the local networks without direct involvement by Ericsson, Ericsson has concluded that it is not causing, contributing to or directly linked to adverse impacts on the conflict. Given that any conflict context is volatile, Ericsson monitors the situation closely.
 - As an example of specific efforts, Ericsson has reviewed external reporting concerning failures of the mobile network in Gaza, and has confirmed that such impacts on the

mobile network infrastructure has been due to external events (e.g. depleted energy sources), and thereby not directly linked to Ericsson's operations and activities.

- 5) What measures is your company taking to ensure it relies on and acts upon continuous, robust monitoring of the situation, including through meaningful consultation with your workers, users, human rights groups, and/or humanitarian organizations, especially those based in the Occupied Palestinian Territory and/or Israel?
- The primary focus for Ericsson in any ongoing armed conflict is the security of our personnel, and to be in continuous contact with our people. Ericsson has a limited number of employees in Israel and the State of Palestine, i.e. West Bank, and no presence or employees in Gaza. As a global company, Ericsson is using its own security resources as well as external partners to continuously assess the situation in conflict areas and take security measures accordingly. The general security situation in the region remains unpredictable and we monitor the situation closely. We decline to provide details about specific security measures.
- 6) In your assessment of human rights risk, how have you sought to engage with rights-holders and broader stakeholders in this context to gain the greatest insight into the context, the risks, possible impacts and solutions, especially with vulnerable and at-risk populations such as women and persons with disabilities, among others?
- Ericsson's workforce in Israel and Palestine is approximately 80 local employees that interact with the local customers to support with the overall objective to keep the mobile networks up and running. Our employees work remotely from home or from our offices. Given the risks during a conflict, our employees are the most important rightsholders that we engage with. The security team is in continuous dialogue with all employees.
 - As a provider of infrastructure, Ericsson has no direct interaction with end-users or consumers or other stakeholders as part of our business operations.
 - Given Ericsson's business operations in Israel and the State of Palestine we have concluded that we are not directly linked to adverse human rights impacts related to the mobile network (see answer above). Given that analysis, Ericsson has not engaged directly with external stakeholders that may, for example, be negatively impacted by the network disruptions. However, Ericsson is continuously monitoring the situation, including via reports from news media and civil society organizations, and will take necessary measures were the situation to change.
 - Ericsson has, during the period of the conflict, engaged with international humanitarian organizations with insight into the conflict in order to monitor developments further. Ericsson is also engaging in multistakeholder dialogues (including with civil society organizations) concerning heightened due diligence in conflict settings and the role of telecommunications providers, which informs Ericsson impact identification and analysis process.

III. Guarding against contributing to or supporting armed groups:

Under Principles 12 and 13 of the UNGPs, companies should seek to prevent or mitigate adverse human rights impacts through their own activities or through their business relationships. Companies' responsibility to respect human rights includes respecting the standards of international humanitarian law in conflict-affected areas.

- 7) If your company has contributed material, financial or technological support to any armed actors in the conflict, what assessments were carried out to ensure that these resources would not be used to harm civilians or violate international humanitarian law?
- Ericsson supplies products and service for both public and private networks, to public and private customers. Ericsson is a supplier of telecommunications infrastructure for civil use and does not develop, manufacture, or provide military equipment.
 - We believe that access to networks and technologies that enable communication is a basic human need that underpins the principles of freedom of expression and opinion and the free exchange of ideas and information. We therefore believe connectivity, also during times of conflict, is essential.

IV. Mitigating risks and tracking effectiveness

Principles 17 to 20 of the UNGPs state that to mitigate and prevent risks and to verify that adverse human rights impacts are being addressed, companies should track the effectiveness of their responses. Thus, this section aims to understand measures taken by companies in accordance with the known risks in the context of their operations.

For social media and other platform companies: *[Not applicable.]*

- 8) What steps is your company taking to prevent the spread of **misinformation, disinformation, hate speech, or incitement to violence** against people of any nationality or religion on its platform?
- a) What measures has your company taken to ensure that its classifiers in **Hebrew and Arabic** are sufficient for safe moderation and adequately trained? What additional resources has your company allocated to address content in these languages?
 - b) Is your company deploying generative AI or other automated tools for addressing misinformation, hate speech or calls for violence?
 - i) If yes, what risk assessments (of the use of this approach) has your company carried out, including in respect of potential harms related to the use of automation or generative AI in moderation?
 - ii) Can you provide examples of corrective action when perverse outcomes have been identified?
-
- 9) What steps is your company taking to prevent **dissemination of propaganda for war and violence** in the context of the ongoing conflict?
- a) Are these measures restricted to Occupied Palestinian Territory and/or Israel, or have you taken measures across all relevant higher-risk territories where you operate?
- 10) What steps has your company taken to deter any censorship of advocates for Palestinian or Israeli human rights or narratives, including allegations of 'shadow banning' or account suspensions?
- 11) Has your company made any changes to its content moderation policies or practices since the beginning of this conflict? Please include information on whether you have lowered thresholds for permissible content or created exceptions on permissible content standards.

For video games, social media and other platform companies: *[Not applicable.]*

- 12) Has your company allowed any party to the conflict to circulate advertisements or promotional videos or any other content relating to the conflict on its platform or game?
- a) If yes, what due diligence was conducted and what measures were taken to prevent dissemination of propaganda for war?
 - b) Has your company monetized or gained revenue from these advertisements and if so, what was the amount?

For telecommunications companies and internet providers:

- 13) What steps is your company taking to maintain connectivity and prevent internet and communications shutdowns in the Occupied Palestinian Territory and/or Israel?
- We are providing support and spare parts through our ongoing customer contracts with the mobile operators in Israel and the State of Palestine. Ericsson itself has no operations, business engagements, or employees in Gaza.
- 14) What steps is your company taking to secure communications to, from, and within the Occupied Palestinian Territory and/or Israel, as well as protect the data and right to privacy of users?
- We provide customary technical support to our customers in order to keep their networks up and running, and in that work we continuously maintain a strong focus on data privacy.

General:

- 15) Has your company made any changes to its advertising and monetization policies and practices since the beginning of this conflict?
- Not relevant for Ericsson and its business model, as a network infrastructure vendor.
- 16) Is your company taking steps to preserve content and other documentation of human rights abuses to aid/facilitate potential future efforts to hold relevant actors to account, including investigations on crimes against humanity and other violations of international humanitarian law?
- Not relevant for Ericsson and its business model, as a network infrastructure vendor.
- 17) What measures has your company taken to facilitate receiving grievances or concerns of users or other stakeholders in relation to the conflict?
- a) Has your company allocated additional resources to deal with these/address such concerns?
 - o Ericsson provides employees and other external stakeholders a dedicated communication channel for reporting compliance concerns – the Ericsson Compliance Line. The Ericsson Compliance Line is operated by a third party and is available 24/7, 365 days per year, enabling people to report from multiple countries and in many languages. Employees and external stakeholders are expected to report conduct that could violate the law, Ericsson’s policies, including the Code of Business Ethics and related steering documents, or the Ericsson Code of Conduct for Business Partners.
- 18) Is your company or subsidiary planning to scale-down or suspend your operations in the Occupied Palestinian Territory and/or Israel?

- Ericsson is monitoring the situation closely. Currently Ericsson continues to support its customers in Israel and the State of Palestine, i.e. the West Bank. The overall objective is to keep mobile communications services up and running.
- a) If so, what plans have you developed regarding responsible disengagement in line with the recommendations of UN bodies?
 - In our experience, the availability of mobile communication services is critical in any society and we expect our services will continue to be in demand. A decision to leave any market includes a holistic assessment of risks, including human rights. Ericsson engages actively in conversations around responsible disengagement and is following developments in this area closely.

V. Transparency and communication:

Principle 21 of the UNGPs provides that companies should communicate externally how they address their human rights impacts, particularly when concerns are raised by or on behalf of affected stakeholders, in a form and frequency that reflects their impact and is sufficient to evaluate the adequacy of their response.

- 19) How is your company communicating the measures it has taken in relation to assessments and mitigation measures surrounding this conflict? Please share links if communications are publicly available.
- We share general information about Ericsson's human rights due diligence activities on Ericsson.com and in the annual Sustainability & Corporate Responsibility report. Further information about Ericsson's due diligence processes can also be found in the GNI's Public Assessment Report.
 - We have not made public any specific information about measures surrounding the conflict in Gaza.
- 20) How is your company communicating the instances of requests it is receiving from states or other authorities to ensure transparency?
- As a network vendor company we typically do not receive requests from states or other authorities.
 - We participate in the GNI to support the general strengthening of the right to privacy and freedom of expression related to mobile networks. The GNI principles sets an internationally recognized standard for how telecommunications companies, and other internet companies, should respond to government requests.

VI. Exercising leverage:

In line with the UNGPs, companies should address their adverse human rights impacts by exercising their leverage. If their impact is actually or potentially directly linked to its operations or services through its business relationships with governments, opposition parties or armed groups, it should take steps to gain and use leverage to prevent and mitigate the adverse impact.

- 21) Has your company or subsidiary made any public statements or comments on the ongoing conflict in the Occupied Palestinian Territory and/or Israel or called for respect of human rights in the current context? If yes, please provide the link.
- No

22) Is your company or subsidiary taking any other actions to promote respect for international humanitarian law, human rights, democracy, and peace in the Occupied Palestinian Territory and/or Israel? Has your company engaged states or other parties in this regard?

- No.

23) Is there anything else that your company would like to share, or questions that you have for the BHRRC?

- No.