



Workshop Summary and Outcomes

**Four Years After the Ukraine Invasion: What Is the Business
and Human Rights Landscape in the Russia Context?**

BACKGROUND

Araminta and Rights CoLab convened a workshop in Prague on 24 February 2026, marking the culmination of a pilot project on capacity-building on Business and Human Rights (BHR) for Russian human rights defenders in exile. The project sponsored five research projects on BHR in the Russia context. These were selected by the two organizations via a competitive application process following a comprehensive BHR training for a larger group of HRDs. Research topics included indigenous peoples' rights in Russia, Russian subsidiary links to European supply chains, responsible exit strategies, and the due diligence obligations of the Telegram platform. Researchers presented their preliminary results the day prior to the workshop in the format of panel discussions with input from outside BHR expert practitioners and academics. The workshop presented a further opportunity to unpack both the research themes and expert feedback, as well as discuss plans for future CSO initiatives on BHR in the region.

GOALS

The workshop set out to explore the following questions:

1. How is the BHR field evolving in Russia and the former Soviet Union (FSU)? What gaps exist in terms of addressing ongoing adverse corporate impact?
2. Would increased civil society participation, oversight and consultation on operational-level grievance mechanisms address some of the accountability gaps in this region?
3. What advocacy, outreach and accountability mechanisms exist that researchers can use?
4. How do we want to develop this project in the future? How should we evolve the formats and content? What audiences should we aim to reach?

KEY INSIGHTS AND TAKEAWAYS

Question 1: What gaps do we need to address in terms of addressing ongoing adverse corporate impact in Russia/FSU?

- **There are bottlenecks when it comes to promoting corporate accountability through due diligence regulation, effective grievance mechanisms, and litigation in Russia and the FSU:** The main obstacles are low capacity and knowledge among civil society and the general public. Accountability-focused civil society groups are often unaware of available mechanisms beyond national-level legal mechanisms, and have minimal to zero knowledge of BHR frameworks. OGMs are often inaccessible to affected workers and communities or do not lead to effective remediation. Community education, CSO capacity building for investigations and documentation, and improving preparedness for potential SLAPP suits are needed. Alliances between CSOs and rights-respecting companies can develop industry-wide influence. The project itself — combining training with funded research — was seen as a meaningful model for this kind of capacity-building.
- **Multilateralism is failing to address ongoing harms against Indigenous communities in Russia.** While some participants maintained that Indigenous rights could be protected in a democratic federation, others argued that extractive colonialism could end only with the disintegration of the federated state and the creation of Indigenous republics, which would have their own UN membership, build alliances with other Indigenous rights groups, and initiate cooperation on pan-Arctic cooperation. While the latter scenario is unlikely in the current Russian context and examples of minority groups gaining control of natural resources are rare, these ideas are not theoretical: they are currently playing out in other contexts, such as Myanmar, where ethnic groups are asserting control over natural resources in their states.
- **In addition to longer-term strategizing, we need to consider measures for short-term survival as activists, BHR advocates and civil society organisations against the backdrop of deregulation, collapsing multilateral structures and increasing levels of repression in the region.** Secure technology (VPNs, circumvention tools, encrypted messengers) is essential for activists in repressive environments. CSOs also have a role in advocating with tech companies for better circumvention tools. Advocates also need both pragmatic and principled arguments; the “business case” framing is not sufficient on its own, and human rights discourse should be revived for its own sake. Crucially, companies are not monolithic — employees can push their organisations to act more responsibly.



Question 2: What role might OGMs play in addressing some of the accountability gaps - especially those that are built and implemented by civil society organisations?

Participants discussed a proposed digital supply chain accountability tool currently being developed by Araminta, which combines a commercial side with an open CSO side:

- **Commercial/Licensed:** The tool is sold to supply-level businesses, including those contracting with multilateral development banks. If a bank buys the license, it obliges its suppliers and contractors to use the grievance mechanism. The tool functions as a case management backend for companies and also functions as a “digital gathering place” for data on claims.
- **Open/CSO:** “Anchor groups” of local CSOs provide community-facing capacity building, verify human rights claims and gather data that is openly accessible. Complainants receive assistance in navigating potential avenues for their claim from CSO partners.

Three insights emerged from the discussion on Araminta’s proposed OGM accountability model:



Supplier incentives:

Under the forthcoming EU Due Diligence Directive (EU CSDDD), suppliers with existing grievance mechanisms only need to address gaps rather than build from scratch, giving local actors agency and a practical incentive to adopt the tool.



Worker-to-worker education:

As demonstrated by the Fair Food Program, worker-to-worker education sessions at the workplace — where workers educate other workers on labor rights and grievance mechanisms openly in front of management — is an effective model for normalising these tools in marginalised communities, along with outcomes from the mechanism itself that are successful in the eyes of the workers who use it.



The EU Forced Labour Regulation as leverage:

Broader in scope than HRDD laws and targeting outcomes rather than process, this regulation creates strong compliance incentives through the threat of a complete ban on goods in the EU market.

In general, the group thought that civil society-run OGMs could positively influence workers' and communities' awareness of their rights, increase stakeholder engagement in the context of companies' due diligence obligations, and raise the capacity of local civil society on BHR.



Question 3: What advocacy, outreach and accountability mechanisms exist that researchers may still wish to make use of?

The following suggestions emerged from discussions of the five research projects.

1. “Does Telegram enable or resist authoritarian practices?”

This project examines how private companies operating within the post-Soviet digital ecosystem can become amplifiers of propaganda, disinformation, and privacy violations through the messenger service Telegram. The primary case study focuses on the Alabuga Special Economic Zone in Tatarstan Republic, Russia—an industrial manufacturing zone that announced plans in 2023 to build a factory for producing unmanned aerial vehicles.

The methodology analyzes Telegram channels to map toxic networks, identify corporate actors linked to harmful information practices, and evaluate privacy threats emerging from state-mandated tools. The project will create a published list of channels connected to the censorship bot as part of a practical guide, map the broader corporate ecosystem, test the due diligence framework across different types of actors, and generate consolidated recommendations for businesses, NGOs, and policymakers on responsible operations within the post-Soviet digital ecosystem.



- Make findings more accessible to the general public, e.g. by developing a series of “did you know” explainers (for example on the human rights due diligence responsibilities of non-algorithmic social media platforms).
- Draw comparisons with other platforms and jurisdictions (e.g. Iran, Hong Kong’s Line shutdown) to show the problem is not unique to Russia.

2. *“From the Arctic to the Tropics: Following the Dirty Trail of Russian Coal”*

This research investigation traces Russian coal supply chains to Vietnam and documents associated human rights and environmental violations at extraction, transshipment, and consumption sites. The study examines coal flows from two Russian mining operations—Elga Group in Sakha Republic (Yakutia) and Beringpromugol in Chukotka Autonomous Okrug—to two of Vietnam's largest steel producers, Hòa Phát Group and Formosa Ha Tinh Steel, which together control nearly 80% of Vietnam's crude steel market.

The methodology combines analysis of Russian-Vietnamese coal trade data with supply chain tracing and evidence collection of human rights violations. Interim results document systematic violations including environmental destruction and pollution on tribal lands of the Evenks and Chukchi peoples near the Elginskoye and Beringovskoye coal deposits, air and marine pollution at Russian Far East transshipment sites where companies failed to meet pollution prevention obligations, and deteriorating living conditions for residents near Hòa Phát Group steel plants in Hai Duong and Quang Ngai provinces.



- Discussion of resources to protect in-country partners in authoritarian contexts - suggestion to make use of security assessments provided by AccessNow.
- Ensure local activists and in-country partners are not identified when sending informational requests to companies.

3. *“Exposing Extractive Colonialism: Indigenous Advocacy at the UN Forum on BHR 2025”*

This project investigates how transnational corporate structures operating in the republics of Sakha, Tuva, and Buryatia enable resource extraction that disproportionately harm Indigenous peoples while insulating companies and state actors from accountability. The research examines three case studies: Nordgold operations in Sakha, Auriant Mining in Tuva, and jade mining in Buryatia, tracing ownership chains through corporate registries in Russia, the UK, Cyprus, Netherlands, Luxembourg, and China.

The methodology combines legal and policy analysis, corporate registry investigation, case



- Explore potential advocacy entry points on adverse impacts caused by Swedish mining companies, including through contact with Swedwatch, checking potential company membership in International Council on Mining and Metals (ICMM), Responsible Minerals Initiative or the

studies, review of sanctions data and corporate filings, and analysis of labour mobilization patterns linked to the war in Ukraine. Preliminary findings reveal complex ownership chains linking Russian mining operations to foreign-registered companies that facilitate tax minimization in extraction regions, profit transfer to offshore entities, and distancing of parent companies from operational liability.

World Gold Council.

- Engage Swedish representatives at this year's meeting of the Expert Mechanism on the Rights of Indigenous Peoples (EMRIP).
- Follow the gold to end destinations (China, UAE) and explore complaint mechanisms in those jurisdictions.

4. *"Tracing European Supply Chains in Russia"*

This project examines environmental violations and sanctions circumvention by German and Dutch companies operating in Russia, focusing on enforcement of European supply chain due diligence laws. The study has so far collected and verified information on seven German companies and three Dutch companies, with a particular focus on the German company Knauf and Dutch Samskip/Eurogate in the maritime sector. The project demonstrates systematic failures by European companies to conduct proper risk analysis and prevention under the German Supply Chain Due Diligence Act (LkSG), whose subsidiaries instead apply lenient Russian environmental standards. Particularly salient cases include Knauf's participation in Mariupol "reconstruction" and the supply of materials by Siemens for Russian nuclear-missile infrastructure.



- Accountability tools need to be matched to the context. Researchers should scale up contacts with legal practitioners, investigative journalists, trade unions and NGOs in France, Netherlands, and Germany. These are valuable partners who can help navigate both the legal aspects of potential complaints as well as strategic alliances that many activists from the region currently lack. They can assist with complaints and communications on adverse environmental impacts caused by Russian subsidiaries of European companies using existing mechanisms (German Supply Chain Act, OECD contact points, etc).

5. “Corporate Accountability and HRDD: Exit Strategies from Russia”

This research project examines corporate accountability and human rights due diligence in multinational companies’ exit strategies from Russia following the 2022 invasion of Ukraine. The study assesses whether companies complied with their human rights commitments under the UN Guiding Principles on Business and Human Rights during their withdrawal.

Six companies are being examined across three industry sectors: Renault and Volkswagen (car construction), Carlsberg and Heineken (beer production), and H&M Group and Inditex (textiles and retail). The core research question asks whether these corporate exits were responsible in human rights terms or whether they caused or contributed to adverse impacts on rights holders, particularly employees.



- To investigate the impact of companies’ exit on workers, try to reach workers through company sustainability departments, trade unions, public Telegram channels (e.g. channels for former employees such as the Siemens former workers’ channel), local journalists, and community/social service groups near factories.



Question 3: If we continue this project, what regional needs should we keep in mind? Who is our target audience? What do we want to change about the format?

A key question discussed in the context of project formats was continuity – how can new project cycles do more than replicate older formats, and build upon the results of the pilot?



Format and logistics: Consider hybrid online/offline models to reduce cost and enable scale; offer beginner and advanced training tracks and keep in mind that certain activist groups are more experienced than others (for example, the environmentalist movement); plan carefully for visa issues for any in-person events.



Target audience: Expand to include more in-country activists (with appropriate security protocols), other FSU countries, and actors in regions linked to Russian supply chains such as Asia-Pacific.



Needs: Prioritise local stakeholder reach; adopt a more rights-holder-centric lens in order to facilitate more potential interaction with affected rights-holders in the context of the trainings and research (as opposed to only company representatives); monitor tech developments in authoritarian contexts (spyware, splinternet, AI chatbots); develop Russian-language BHR materials, which is currently a significant gap; maintain opportunities for interaction with international BHR experts.

Concluding thoughts

The field is under pressure but the work remains essential. Participants voiced concern about declining European interest in Russian supply chains and civil society due to Russia's geopolitical isolation — yet external experts pushed back, arguing that researchers' findings demonstrate exactly why this scrutiny remains necessary. Russian subsidiaries of European companies continue causing environmental harm in Russia with impunity, and commodities like Russian coal reach EU supply chains via third countries like Vietnam. These cases can in fact win over skeptics of HRDD laws in the political arena precisely because of their geopolitical salience. An example of this is the willingness shown by German politicians to facilitate complaints under the Supply Chain Act in relation to Russian supply chains despite their parties' historical opposition to due diligence laws.

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