Catena-X Automotive Network e.V.

Catena-X

Practical Guide

Mapping of Human Rights Regulations

Catena-X
Automotive Network

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Management Summary

The Human Rights Expert Group has prioritized the identification and assessment of human rights risks. The consideration of environmental issues and potential violations will follow in subsequent phases. This document does not include technical recommendations; however, it provides references to relevant Catena-X normative standards accessible via the Catena-X e.V. and Tractus-X Open Source webpages.

As regulatory frameworks continue to evolve, this document will be periodically updated to ensure ongoing relevance and compliance. All cited sources are directly linked to their original materials to minimize the frequency and scope of future revisions.

This document does not constitute legal advice or establish any binding obligations on the contributors. Its content remains subject to change in accordance with future regulatory developments, which may vary across jurisdictions.

Intention of this practical guide

Implementing human rights regulations can present particular challenges for small and medium-sized enterprises (SMEs). By approaching the process in clearly defined steps, it becomes more structured, feasible, and aligned with regulatory expectations. This practical guide has been developed to support SMEs in understanding and addressing human rights requirements by providing:

- An introduction to key regulations relevant to human rights.
- A comparative overview of these regulations and the identification of a comprehensive set of human rights risk topics.
- Foundational guidance to facilitate orientation on significant human rights risk areas.
- Recommended key steps and guidance on the application of common Self-Assessment Questionnaires (SAQs) for gathering information related to human rights risks.

Overview of strictest regulations

This practical guide provides a consolidated overview and an appropriate level of detail to support understanding of the purpose, scope, and distinguishing features of key human rights–related regulations.

Based on their enforcement mechanisms and potential corporate impact, three regulations are identified as the most stringent: the Corporate Sustainability Due Diligence Directive (CSDDD, Europe), the Uyghur Forced Labor Prevention Act (UFLPA, United States), and the Due Diligence Guideline for Responsible Mineral Supply Chains (China). While all three regulations share the objective of strengthening corporate responsibility and safeguarding human rights, they differ significantly in their scope, focus, and enforcement approach. The EU's CSDDD encompasses a broad range of human rights and environmental considerations. In contrast, the UFLPA specifically targets the prevention of forced labor in designated regions. The Chinese Due Diligence Guideline provides a framework for identifying, preventing, and mitigating risks related to conflict, severe human rights violations, and misconduct in mineral supply chains, particularly in conflict-affected and high-risk areas.

Understanding these distinctions is essential for SMEs to ensure compliance and to promote responsible business conduct across their operations and supply networks.

Introduction to Key Regulations

Corporate Sustainability Due Diligence Directive (EU) – EU CSDDD
(link: **EU CSDDD**)

It is a harmonized legal framework within the EU with potential legal and financial consequences for non-compliance. The EU's Corporate Sustainability Due Diligence Directive (CSDDD) requires companies to comply with human rights and environmental due diligence obligations throughout their entire value chain. It applies to large EU and non-EU companies with significant turnover in the EU, mandating due diligence processes and climate change mitigation plans[1]. The directive primarily affects large companies based in the EU and international companies operating in the EU.

US Uyghur Forced Labor Prevention Act (UFLPA)
(link: **UFLPA US Gov Info / US Customs & Border Protection)**

The UFLPA prohibits the importation of goods into the US that are produced fully with forced labour, particularly from the Xinjiang Uyghur Autonomous Region of China. It establishes a rebuttable presumption that goods from this region are made with forced labour, placing the burden to proof otherwise on importers and by that could immediately negatively impact the supply chain. Goods presumed to be made with forced labour are prohibited from entry into the US, with enforcement led by US Customs and Border Protection.

China Due Diligence Guideline for Responsible Material Sourcing
(link: **CCCMC Due Dilligence)**

The Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, issued by the China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exporters (CCCMC[2]) in cooperation with the OECD, aim to align Chinese companies with international standards. They provide a risk-based framework to identify, prevent, and mitigate risks of contributing to conflict, serious human rights abuses, and misconduct in mineral supply chains. The Guidelines apply to all companies engaged in mineral extraction, trade, or use and encourage transparency, audits, and public reporting. Implementation is voluntary but designed for mutual recognition with global initiatives. The Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains do not set thresholds based on company size (employees or revenue). Instead, they apply to any enterprise engaged at any point in the mineral supply chain—including extraction, trading, processing, and use of mineral resources.

Practical Guide

This practical guide is structured to enable continuous updates with limited effort, while allowing interested parties to further develop and adapt the content for their own purposes.

- First, a broad overview of global and regional human rights–related regulations was conducted. From this analysis, the focus was placed on the strictest and most comprehensive instruments: the EU Corporate Sustainability Due Diligence Directive (EU CSDDD), the Uyghur Forced Labor Prevention Act (UFLPA), and the Chinese Due Diligence Guideline for responsible mineral supply chains.

- Second, all human rights–related risk categories and subcategories were identified and consolidated. These categories formed the basis for mapping the three regulations, relevant certification schemes, ISO standards, audit frameworks (such as SAQ 5.0), and typical Business Codes of Conduct against the defined risk (sub)categories. This exercise enabled the identification of potential recommendations and guidance, as well as indications of which certificates, audit results, or other evidence may help demonstrate a company's due diligence efforts. Building on these insights, the focus was refined in a third step.

- Third, the analysis concentrated in more detail on the EU CSDDD and the Chinese Due Diligence Guideline. A dedicated coding system was applied to the risk (sub)categories and mapped against the questions of SAQ 5.0 to determine areas of coverage and potential gaps.

Note: At a later stage, the outcomes of this work may be incorporated into the activities of SAQ working groups (for example in the context of a future SAQ 6.0) or similar questionnaire providers. The Self-Assessment Questionnaire (SAQ) developed by Drive Sustainability is currently one of the most widely used sustainability questionnaires in the automotive industry. The mapping compares SAQ 5.0 in detail with the EU CSDDD and the Chinese Due Diligence Guideline in both directions. The results are presented in an XLS-based tabular format, with separate views for SAQ and for the regulatory frameworks. For each SAQ 5.0 question, the table indicates whether and how it addresses the EU CSDDD and the Chinese Due Diligence Guideline, highlighting similarities and differences with a simple yes/no indication.

20260902 SAQ 5.0
vs CS3D-China DD-L

- ⇨ See files in attachment: use paperclip symbol in Acrobat Reader

Note: This table was created by using the following prompts (available in the excel file)

<u>Prompt for CSDDD & Chinese DD:</u>
We are policy experts in a sustainability environment and need help in mapping out different documents for us. Our goal is it to understand how the drive sustainability SAQ, a sustainability self-assessment questionnaire for human rights, responsible material sourcing etc., and the Chinese, relate to each other. We want to understand similarities and nuanced or broader differences in wording and requirements of both documents. We will provide you with an empty version of the questionnaire and the Chinese DD Guidelines for Responsible Mineral Supply Chain Please give us your answer as a .CSV text, so we can copy it into an Excel-file. Please structure your answer as a spreadsheet with four columns: Column 1: SAQ requirement, as in what action is implied by each SAQ question (Brief summary and include the number of the question) Column 2: can this topic be found in the Chinese DD Guidelines for Responsible Mineral Supply Chain, as in is the requirement that is implied by the SAQ resembled in the Chinese regulation (Brief summary with main words, include page number), Column 3: Similarities, differences. Please include nuanced differences in wording, and big gaps, meaning topics that can be found in the SAQ, but not in the Chinese regulation. At the end, list all ESG- related topics in column 2 that can't be found in the SAQ.

<u>Additional prompt for UFLPA:</u>
We are policy experts in a sustainability environment and need help in mapping out different documents for us. Our goal is it to understand how the drive sustainability SAQ, a sustainability self-assessment questionnaire for human rights, responsible material sourcing etc., and the requirements deriving from the American UFLPA (Uyghur forced labour prevention act), relate to each other. We want to understand similarities and nuanced or broader differences in wording and requirements of both documents. We will provide you with an empty version of the questionnaire and the American UFLPA law text and a fact sheet. Please give us your answer as a .CSV text, so we can copy it into an Excel-file. Please structure your answer as a spreadsheet with four columns: Column 1: SAQ requirement, as in what action is implied by each SAQ question (Brief summary and include the number of the question) Column 2: can this topic be found in the UFLPA law or fact sheet, as in is the requirement that is implied by the SAQ resembled in the American UFLPA regulation (Brief summary with main words, include page number), Column 3: Similarities, differences. Please include nuanced differences in wording, and big gaps, meaning topics that can be found in the SAQ, but not in the UFLPA. At the end, list all ESG- related topics in column 2 that can't be found in the SAQ, but are part of the UFLPA.

Link to Input files: *<u>EU Legislation CSDDD</u>, <u>China DD Legislation</u>, <u>empty SAQ 5.0</u>, <u>UFLPA US Gov Info</u>.*

Include the most important certificates and audits with relevance to EU CSDDD, China DD, UFLPA:

20260902 - Certificates vs CS3D

⇨ See files in attachment: use paperclip symbol in Acrobat Reader

Note: This table was created by using the following prompts (available in the excel file)

CSDDD:

My task involves creating an Excel table designed to structure specific data across multiple columns. The table will feature the following headings in this precise order:
Certificate: This column will list the names of the respective certificates.
Explanation: This section will provide an explanation or description for each certificate.
Type of verification: This column will clearly indicate the required verification type (1st, 2nd, or 3rd Party) for each certificate.
Certificate validity period [years]: This column will specify the validity duration of the certificates in years.
Actual revision: The current revision number of the certificate will be noted here.
Actual revision year: This column will state the year of the actual revision.
Future revision: Finally, this column will contain information regarding planned future revisions.
For the content analysis and population of these columns, I will require the data to be extracted from the PDF file I have provided.

China Due Diligence Guideline for Responsible Material Sourcing:

Now, please create a table for me using this exact schema, focusing on certificates that have not been previously listed but are relevant to the Chinese DD Guideline. For this purpose, I have attached the Chinese DD Guideline as a PDF file.
Input files separate tab in excel file (core for the prompt)

UFLPA

We are trying to map different Certificates and industry norms. Doing so for the UFLPA wouldn't be practical, because there is no blueprint as to what CBP will accept. However, could you please investigate each of the certificates i am going to provide you with and determine whether they are thematically in the ballpark of the UFLPA? I am aware, that they won't be enough to get something through the US-Border, but I am interested in partial coverage as well. Certificates: ISO 26000 SA 8000 ISO/IEC 27001 ISO/SAE 21434 ISO 50001 EN 16001 ISO 14001 ISO 14064-1 PAS 2060 EMAS ISO 26030 QuB ZNU-Standard ISO 20400 Women's business enterprise Minority business enterprise ISO 45001 BS OHSAS 18001 SCC/SCP Directive 2012/18/EU or the Seveso-III Directive ISO 9001 IATF 16949 IRIS AS 9100 ISO 22301 NADCAP ISO 26262 ASPICE VDA 6.1 VDA 6.2 AEO ISO/IEC 17025 ISO/TS 22163 CMMI Amfori BEPI Amfori BSCI Fair Labor Association (FLA) Ecovadis Rating ISO 19600 Compliance Management System ISO 37301 Compliance Management System OHSAS 18001 - Arbeitsschutzstandard Responsible Business Alliance (RBA) SMETA (SEDEX Audit) World Fair Trade Organization (WFTO) Worldwide Responsible Accredited Production (WRAP) Amfori BSCI (Business Social Compliance Initiative) EMAS (Eco-Management and Audit Scheme)

Comment: due to the nature of UFLPA the results of comparing certificates & SAQ can only be indicative. Additional risk assessment through Value Stream Mapping (VSM) is strongly recommended.

Link to Input files: *EU Legislation CSDDD, China DD Legislation, UFLPA US Gov Info,*

Recommendations

Recommendation for SAQ Provider

SAQ providers are encouraged to explicitly map their questions to the most relevant human rights risk topics that fall within the scope of the EU Corporate Sustainability Due Diligence Directive (EU CSDDD), the Uyghur Forced Labor Prevention Act (UFLPA), and the Chinese Due Diligence Guideline. This can simplify and standardize the interpretation of responses in the context of due diligence obligations.

To support this, this guide provides a list of detailed risk topics and subtopics that should be considered by SAQ providers when designing or updating their questionnaires.

Recommendation for companies

This guide proposes five key steps to support orientation and includes practical suggestions derived from experience. By following these steps, small and medium-sized enterprises (SMEs) can strengthen the implementation of relevant regulations, enhance compliance, and foster responsible business conduct in their operations and supply networks.

Five key steps – a proposal for orientation

1. **Understand regulatory requirements**
   Begin by familiarizing the organization with the requirements of the EU CSDDD, the UFLPA, and the Chinese Due Diligence Guideline. Particular attention should be paid to due diligence processes, environmental impacts and mitigation, and obligations relating to labour conditions in the supply chain.

   - EU CSDDD: Focus on due diligence requirements across the value chain and on climate transition and mitigation expectations.
   - UFLPA: Understand the rebuttable presumption of forced labour and the evidentiary requirements to demonstrate that goods are not produced with forced labour.
   - China Due Diligence Guideline: Consider the five recommended steps for responsible material sourcing, including establishing strong management systems, identifying and assessing supply chain risks, designing and implementing responses, conducting independent third-party audits, and reporting on due diligence.

2. **Establish Robust Company Management Systems**

    - Develop and maintain effective management systems that support due diligence efforts. This includes setting up clear policies, assigning responsibilities, and integrating due diligence into your company's operational processes.
    - Collaborate with your suppliers, customers, and other stakeholders to ensure compliance with your own Supply Chain Due Diligence Code of Conduct. Create clear policies addressing human rights and environmental standards.
    - Policies must communicate to all employees and suppliers. Provide training for your own staff and support suppliers to help them meet your standards. Establish mechanisms for addressing any identified issues.
    - Continuously improve your due diligence processes based on feedback, new information and updated regulations, guidelines and directives.

3. **Identify and Assess Supply Chain Risks**

    - Systematically identify and assess risks in the supply chain, focusing on human rights, environmental impacts, and other areas emphasized by the selected regulations.
    - Engagement with internal and external stakeholders can help ensure that relevant risk areas are adequately captured.
    - Risk management tools can be used to map social and environmental incidents and to structure information exchange with business partners. Risks should be prioritized based on their severity and likelihood.

4. **Implement Risk Response Strategies**

    Design and implement appropriate measures to address prioritized risks. This may include supplier engagement, capacity-building activities, corrective action plans, and independent third-party audits to verify progress.

    - For EU CSDDD and China DD:
      Put in place processes to identify, prevent, mitigate, and, where necessary, remediate adverse impacts, supported by regular monitoring and review.
    - For UFLPA:
      Establish robust supply chain tracing and documentation processes (e.g. VSM - value stream mapping) to demonstrate that no forced labour is involved and to be able to provide credible evidence when requested.

5. **Monitor Progress and Report Annually**

   Continuously monitor the effectiveness of due diligence measures across operations and supply chains. Monitoring should feed back into the improvement of processes and controls.
   Report on progress at regular intervals, for example annually, in line with regulatory expectations and stakeholder needs. Reporting should transparently describe actions taken, results achieved, remaining challenges, and planned improvements.

Practical Tips for SMEs

- Define a roadmap: Clarify how data on suppliers, risks, and due diligence measures are currently collected, prepared, transformed, and exchanged, and outline how these processes should function in the future to meet regulatory expectations.
- Leverage digital solutions: Use appropriate digital tools to map supply chains, document business relationships, and support risk identification, assessment, and monitoring.
- Engage external expertise: Where necessary, consult external experts or participate in sectoral initiatives and industry groups focused on sustainability, human rights, and standardisation to strengthen internal capabilities.
- Start with high-risk areas: Prioritise business partners, regions, and materials associated with higher human rights or environmental risks and progressively expand due diligence activities from there.
- Stay informed: Monitor developments in regulations, standards, and good practices relevant to your sector and update internal policies, processes, and training accordingly.

Update History

Last updated on	Version	Updated by
11.01.2026	V1.00	EG DDG André Kremer / Sven Dahlmeier

Addendum

The following sources were used in the creation of this practical guide and serve as an additional source of information:

- Corporate Sustainability Due Diligence Directive (CSDDD, EU)
- Uygur Forced Labor Prevention Act (UFLPA, US)
- Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition), (China Chamber of Commerce of Metals, Minerals, and Chemicals Importers & Exporters (CCCMC, China))

Annex

The following standards were used in addition to accompanying documents and serve as an additional source of information.

ILO Code of Practice in Safety and Health

ILO International Labor Standards

ISO 14001

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

OECD Guidelines for Multinational Enterprises

Universal Declaration of Human Rights

United Nations Convention Against Corruption

United Nations Convention on the Rights of the Child

United Nations Convention on the Elimination of All Forms of Discrimination Against Women

United Nations Global Compact

High Conservation Value Resource Network (HCV)

High Carbon Stock Approach (HCSA)

Initiative for Responsible Mining Assurance (IRMA)

Responsible Business Alliance (RBA)

Drive Sustainability Guiding Principles

Farm Animal Welfare Committee (FAWC)

Terrestrial Animal Health Code

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