

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?
- 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?

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?
 - a) Does your company have a policy on conducting human rights due diligence and heightened human rights due diligence in the context of conflict?
 - b) What resources or guides is your company relying on to inform its approach to due diligence in respect of this conflict?
- 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?
- 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?
- 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

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

risks, possible impacts and solutions, especially with vulnerable and at-risk populations such as women and persons with disabilities, among others?

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?

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:

- 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:

- 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?
- 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?

General:

- 15) Has your company made any changes to its advertising and monetization policies and practices since the beginning of this conflict?
- 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?
- 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?
- 18) Is your company or subsidiary planning to scale-down or suspend your operations in the Occupied Palestinian Territory and/or Israel?
 - a) If so, what plans have you developed regarding responsible disengagement in line with the recommendations of UN bodies?

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.
- 20) How is your company communicating the instances of requests it is receiving from states or other authorities to ensure transparency?

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