THE BUSINESS'S COMMERCIAL SUCCESS SUBSTANTIALLY DEPENDS UPON:

RED FLAG NO. 15

RED FLAGS IN THE VALUE CHAIN

Structuring business relationships in ways that limit the company's ability to influence decisions or actions that affect the rights of stakeholders

Such as:

- Structuring **joint venture (JV) partnerships** such that the company situates control over decisions on land, employment and/or responses to community concerns with the business partner
- Structuring **client-advisor relationships** such that the scope of advice excludes consideration of impacts on people
- Structuring **multi-bank syndicated loans** such that a participating bank relies on the due diligence of a lead arranger or E&S (environment and social) coordinating bank
- Utilizing franchise models in which labor, land acquisition and other rights-relevant issues are not covered by franchise contracts
- Structuring **AI and other technology business relationships** such that responsibility for identifying and managing impacts on people is allocated to other commercial actors despite the company retaining significant influence over system design, deployment conditions or commercial incentives
- Structuring **outsourced platform moderation** or trust-and-safety operations such that responsibility for worker wellbeing or grievance handling sits with third-party vendors despite the company retaining significant influence over how the work is performed

HIGHER-RISK SECTORS

- Finance industry
- Law firms
- Mining industry
- Franchised food and beverage companies
- Construction industry
- Tourism, Hospitality and Entertainment
- AI development and deployment
- Online platforms
- Companies in various sectors expanding into geographies where conditions of entry only allow non-operating stakes in JV

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KEY QUESTIONS FOR LEADERS TO ASK OR BE ASKED

- How does the company know whether and when the structure of its relationships with business partners may be reducing its ability to ensure that salient human rights risks are effectively managed?
- When selecting business partners, how does the company scrutinize potential partners' ability to identify and manage human rights issues?
- How does the company use its leverage at the point of structuring a relationship and defining the roles and responsibilities of different business partners to help ensure human rights risks will be well managed?
- How does the company approach using product/service reviews, updates or maintenance as moments to exercise leverage focused on addressing human rights risks?
- How does the company discuss and make decisions about the viability of business partnerships where there is no evident way to mitigate salient human rights risks?

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RISKS TO PEOPLE

The way in which companies decide to structure their business relationships can have an effect on their ability to meet their human rights responsibilities.

Below are examples of ways in which companies structure relationships that fragment contractual responsibility and create accountability gaps, that may reduce their ability to identify, prevent, mitigate and account for human rights impacts, or may reduce their perception of their responsibility to do so. Writ large, the effect of this can be an increase in risks to people due to absent or weak due diligence. Over-reliance on representations, audits, or due diligence conducted by business partners without adequate internal expertise to scrutinize findings and recommendation may create blind spots where companies fail to independently assess severe or foreseeable risks to people.

- In a **syndicated loan**, this may arise where the bank:
  - relies on human rights due diligence conducted or commissioned by another participating bank in the syndicate;
  - has little (direct) interaction with the E&S coordinating bank and/or the other participating banks on human rights impacts;
  - has little interaction with stakeholders potentially affected by the project or those representing their interests; or
  - has no influence over the creation or effective management of grievance mechanisms for affected stakeholders.

- In a **JV partnership**, this may arise where one party takes sole or primary responsibility for communication and dispute resolution with third parties, or where a company situates control over decisions on land and employment with the partner. This can be particularly problematic where the partner with this responsibility is an enterprise wholly or partially owned by a government that has a history of causing or ignoring impacts on vulnerable groups in the country, and the company has little practical leverage available to it. In some cases, companies' growth strategies will involve entry into higher-risk markets that require the formation of JVs with companies - including with state-owned enterprises, that do not have a positive track-record of managing human rights impacts.

- In a **franchising relationship**, this may arise where contracts retain franchisor control over businesses' methods, procedures and standards, but not set out requirements on - nor accept responsibility for - rights-related issues such as employment practices, land acquisition, and the environment.
  - In an outsourcing relationship, this may arise where a company's value proposition depends on performance outcomes delivered through third-party contractors, while responsibility for workers' employment conditions is allocated to those contractors. For example, Amazon has structured large parts of its last-mile delivery operations through independently owned Delivery Service Partners, an arrangement that has attracted scrutiny over whether responsibility for drivers' working conditions is appropriately aligned with the company's influence over delivery performance requirements and operational expectations.

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RISKS TO PEOPLE

- In an **advisory relationship**, such as a lawyer-client relationship, this may arise where the advisor limits (or accepts their client's instructions to limit) their advice to exclude some or all potential impacts on human rights, at best closing the door to an important avenue for leverage held by advisors, and at worst playing a role in rendering it more likely that the client will impact rights through the relevant activities. (See related discussion on the role of the corporate legal advisor here).

- In the context of **technology**, products and services are often developed, deployed and operated through multiple commercial actors. While this is not unique to the sector, the complexity of these arrangements can create assumptions that responsibility for identifying, preventing and addressing impacts on people is being managed elsewhere in the value chain. In other cases, contracts, licensing arrangements or other commercial relationships may explicitly allocate responsibility for managing impacts to other actors, despite the company retaining significant influence over system design, deployment conditions or commercial incentives. At the same time, growing dependence on a small number of providers of cloud infrastructure, foundation models, specialized datasets and other critical inputs can concentrate influence and reduce visibility into, and leverage over, decisions that affect risks to people. OHCHR highlights so-called "low-leverage operating models", in which responsibility is allocated to commercial partners with limited capacity or leverage to manage severe impacts, constraining effective prevention and response.
    - **AI deployment, licensing and integration arrangements:** Companies may structure licensing, integration, deployment or API access arrangements such that responsibility for identifying and managing impacts on people is allocated to deployers, integrators, customers or other commercial partners, despite the company retaining significant influence over system capabilities, deployment conditions or commercial incentives.

- **Outsourced operational functions:** Companies may allocate responsibility for worker wellbeing, grievance handling or other rights-relevant issues to contractors or vendors responsible for content moderation, trust and safety, data annotation or other operational functions, despite retaining significant influence over how work is organized and performed in practice.

In circumstances such as those above, a **responsibility gap** can emerge where neither business partner is engaged with addressing potential impacts, or where the contractual responsibility to do so is situated with a partner less able to do so. Further, a **remedy gap** emerges where neither business partner engages with grievances, impacting stakeholders' right to remedy.

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RISKS TO THE BUSINESS

- **Operational, Financial and Reputational Risks:** A company's understanding and implementation of its own responsibility in relation to impacts can be undermined when it structures a relationship in ways that limit its own scope for action and its accountability.
  - For example, risks can arise where there are mistaken assumptions that due diligence conducted or commissioned by the E&S coordinating bank in a syndicated loan for project finance is sufficiently thorough. Reliance on another financial institution's due diligence, environmental and social coordination role, or client relationship management does not eliminate a participating institution's own responsibility to understand and respond to salient human rights risks connected to the transaction. High profile examples of community conflict halting projects have highlighted that each financier is expected to know (and to show) that the HRDD conducted meets expectations: according to Banktrack, banks participating in the financing of the Dakota Access Pipeline "found themselves on the receiving end of the #DefundDAPL divestment campaign after the project violated Indigenous People's rights – estimated to have cost them between USD$8 and $20 billion in deposit withdrawals."
  - Companies that strategically, or through regulatory requirement, enter higher risk jurisdictions via "arms-length" arrangements, such as through purchasing agreements with third-country companies that are more established in the region - can expose themselves to reputational and operational risks that arise from a lack of operational control that they would otherwise enjoy when engaging directly with factories on the ground.
  - Similarly, technology companies may face operational, legal, regulatory and commercial risks where activities central to the functionality, safety or value proposition of a product are performed by third parties, while responsibility for associated human rights risks is allocated to those parties. For example, **Meta** agreed to a **USD$52 million settlement** in 2020 with current and former content moderators employed through outsourcing firms, following claims of psychological harm linked to repeated exposure to graphic material.

- **Legal and Reputational Risks:** There have been several lawsuits seeking to hold US company **McDonald's** responsible for the treatment of franchise workers. In the United States the responsibility of franchisors to assume responsibility for employment conditions is a contested area. The company has stated that "franchisees are independent businesses that want to make their own decisions about hiring, pay and other matters." Worker advocacy groups have "argued that many companies use contracting and franchising as a shield from responsibility for workers who make their business possible."
  - In 2020, a complaint was brought to the Dutch National Contact Point against **McDonald's** on the basis that the company had not met OECD guidelines which "require due diligence by institutional shareholders in companies to ensure responsible business conduct." The complainants alleged that due to "systemic sexual harassment" at franchised restaurants, the company had "neglected to act to create a safe workplace" for franchise employees.

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RISKS TO THE BUSINESS

- In 2023, **McDonald's UK** signed a legally binding agreement with the Equality and Human Rights Commission (EHRC) in which it pledged to protect its staff from sexual harassment, following which the EHRC set up an email hotline to take complaints; Thereafter, following a BBC investigation the company "deeply apologized". Also in 2023, in a landmark ruling the Delaware Court of Chancery held that the former global chief people officer could be sued by shareholders for the damage they claim he caused to the restaurant chain by allegedly allowing a culture of sexual harassment to flourish.
- **Meta** has faced a series of lawsuits in Kenya concerning content moderation and platform governance activities carried out through third-party service providers. The cases raise questions about the extent to which technology companies can allocate responsibility for human rights impacts to contractors while retaining significant influence over the design and operation of their platforms, highlighting the legal and reputational risks associated with such arrangements.

- **Business Opportunity Risks:** Where advisors do not advise clients appropriately on the human rights risks associated with corporate decisions or activity, they risk losing repeat business when that advice proves inadequate in practice. The International Bar Association notes that: "There is growing recognition that a strong business case exists for respecting human rights and that the management of risks, including legal risks, increasingly means that lawyers, and particularly business lawyers, need to take human rights into account in their advice and services. The UNGPs are relevant to many areas of business legal practice, including but not limited to corporate governance, reporting and disclosure, litigation and dispute resolution, contracts and agreements, land acquisition, development and use, resource exploration and extraction, labour and employment, tax, intellectual property, lobbying, bilateral treaty negotiation, and arbitration."

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WHAT THE UN GUIDING PRINCIPLES SAY

**For an explanation of how companies can be involved in human rights impacts, and their related responsibilities, see here.*

The parties to a business relationship may decide to allocate formal responsibilities in a particular way in their agreements – including responsibilities for identifying and addressing human rights risks. However, that **does not remove them from any responsibility should human rights harms occur**. Under the UNGPs and OECD guidance, commercial and contractual arrangements between business partners do not determine whether a company is connected to impacts; companies may still be linked to, contributing to, or benefiting from impacts regardless of how responsibilities are formally allocated between parties. For example, a company will still have a responsibility as a result of being **linked to** (and in some cases potentially **contributing to**) human rights impacts:

- In the context of a JV:
  - whether it is a majority or minority stakeholder; and
  - whether or not it has primary responsibility for communication and dispute resolution with third parties;
- In the context of advice to clients:
  - regardless of unilateral or agreed caveats with respect to what the advice does and does not address; or
- In the context of syndicated loans for project finance:
  - regardless of decisions on who will conduct/lead due diligence.

Similarly, a franchisor will still be **linked (or potentially contributing) to** impacts caused by franchisees vis-à-vis franchise employees.

Business relationships that are structured in these ways will typically affect the company's ability to exercise **leverage** to mitigate human rights risks or impacts unless specific measures are included to address this. Where human rights impacts were foreseeable and the company still took on a role where its control or leverage was limited, this may be seen to suggest that the company **contributed** by omission to impacts caused by a business partner.

POSSIBLE CONTRIBUTIONS TO THE SDGS

Where a company retains and uses leverage with business partners to strengthen respect for human rights, it can contribute to various SDGs. It may also build the capacity of its partners to contribute to the SDGs, by helping them understand and implement their own responsibilities, thereby contributing to
Goal 17: Partnerships for the Goals, in particular:

- **Target 17.6** "Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries".
- **Target 17.17** "Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships."

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DUE DILIGENCE LINES OF INQUIRY:

- Do we clearly communicate our human rights expectations to our partners?
- How thorough are our due diligence procedures and do they include human rights risks? Do we tend to defer to or rely on processes of another partner without our own investigations? Are we prohibited from making contact with stakeholders by our agreements with business partners? How do we identify gaps between others' processes and international human rights standards? How do we address these gaps? Do we look for early opportunities (e.g. at point of market entry) to create leverage? Do we include leverage mapping in our due diligence procedure?
- Does the structure or duration of the relationship significantly limit our leverage?
- Do we have or participate in an effective grievance mechanism through which affected persons can raise human rights issues related to our partners' activities?
- Do our agreements with partners contain confidentiality or consent requirements that constrain our ability to disclose information about our operations in higher risk areas? If so how do we ensure that stakeholders have access to information relevant to understanding how they may be affected and to claiming their rights?

Joint Ventures

- For **joint ventures** with significant human rights risks, do we ensure that legal and other agreements underpinning the ventures provide the necessary basis to ensure that human rights are respected in their operations (see OHCHR and Business Dilemmas Forum)? For example:
  - How do our agreements with partners allocate roles with relevance to the human rights of stakeholders, such as decisions on sourcing, land, employment or dispute resolution with third parties?
  - How do we ensure our partners carry out these roles in ways that respect human rights?
  - Do we have pre-agreement on how human rights incidents and disputes will be dealt with, once they arise?
  - Do we have the right to conduct audits of overall human rights compliance?
  - Do we have the right to terminate the agreement in the event that human rights non-compliances are identified during such audits and are not rectified within a reasonable amount of time?
  - Are there JVs where these requirements do not exist and attempting to change contract terms is too difficult? What procedures does the company have in place in such circumstances?
  - Do we include JV supply chains in our consideration of human rights risks?

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DUE DILIGENCE LINES OF INQUIRY:

Technology relationships

- Which actors, technical dependencies or third-party services are critical to preventing or mitigating risks to people across our technology ecosystem, and where do capability or accountability gaps exist?
- How are responsibilities for identifying, preventing, mitigating and remedying impacts on people allocated across model developers, deployers, integrators, cloud providers, vendors and our other commercial partners? Where do we depend on information, monitoring or risk assessments held primarily by another actor, and how do we ensure timely access to the information needed to identify and respond to harms?
    - Does our commercial model rely on "low-leverage" relationship structures — that is, arrangements that limit our practical ability to influence how risks to people are identified, prevented, mitigated or remedied? If so, how do we assess whether sufficient leverage exists to manage foreseeable harms?
    - Are there critical dependencies in our technology value chain — such as cloud providers, foundation model providers, data providers or other infrastructure partners — whose decisions materially affect risks to people? If so, what visibility and leverage do we have over those decisions, and how do we manage situations where our ability to influence them is limited?
- Where product deployment, moderation, data handling or other operationally significant functions are outsourced, what oversight mechanisms do we retain to monitor human rights risks and intervene where harms arise?
- Are there points in our technology value chain where we rely primarily on another commercial partner's assessments, monitoring or due diligence processes, or where critical information relevant to risks to people sits primarily with another actor? If so, how do we independently assess whether these meet our own standards and international expectations, and ensure timely access to information needed to respond where harms arise?
- Where products or services may foreseeably be used in ways that create heightened risks to people, how do we assess whether licensing, API access or deployment arrangements provide sufficient leverage to prevent misuse? *(See further Red Flag 9)*
- What contractual, technical or governance mechanisms enable us to suspend, restrict, audit or terminate relationships where human rights risks are inadequately managed?
- How do we ensure that affected workers, users and other stakeholders have accessible channels to raise concerns, seek remedy or trigger escalation across multi-party operational arrangements?
- Where preventing or remedying harm requires action by multiple ecosystem actors, do pre-agreed escalation and coordination pathways exist?

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MITIGATION EXAMPLES

**Mitigation examples are current or historical examples for reference, but do not offer insight into their relative maturity or effectiveness.*

There are numerous examples of a company seeking to influence the behavior of a business partner, including where that partner has primary responsibility for areas that impact rights.

Joint Ventures (The following anonymized examples are showcased in Shift's publication, *Using Leverage in Business Relationships to Reduce Human Rights Risks*).

- **Shadowing Partners:** A company has shadowed a JV partner as it conducted a stakeholder engagement.
- **Seconding Staff:** A company has seconded staff to a JV operation to lead on community relations and/or human rights risk management.
- **Shared Audits:** A company has conducted an internal audit of its own human rights performance at an operation, and shared results with key business partners, with an invitation/offer to collaborate with them on addressing shared challenges, as well as on future such audits.
- **Company Policies and Codes of Conduct:** In addition to setting out expectations for non-managed JVs and non-controlled companies in their *own* policies (see **Rio Tinto** here), companies have negotiated the inclusion of references to their own standards or policies in joint agreements, such as a Code of Conduct or policies on security. For example, in the context of non-operated JVs, **Total** reports that it "make[s] ongoing efforts so that the operating party applies equivalent principles to ours.
- **Contract Provisions:** Companies have negotiated various human rights-related provisions in contracts with business partners that created leverage later in the relationship. Examples include contract provisions that:
  - set out a commitment to meet certain standards (e.g., Voluntary Principles on Security and Human Rights, IFC Performance Standards);
  - give the company (even when a junior partner) the lead in managing human rights-related issues or in staffing the community relations function at an extractive project;
  - require a higher voting majority of the board on human rights-related issues.
- **Multi-stakeholder (Industry) Initiatives (MSIs) with Human Rights Commitments:** A company may require or suggest that a partner join a credible multi-stakeholder (industry) initiative, or may **jointly join an initiative with them**: for example, PNG and FGB jointly joined the FLA in furtherance of "a desire to drive long-term change in the palm oil supply chain for the industry as a whole." Companies have [also] highlighted partners' existing commitments – including those made in the context of MSIs – when seeking to exert leverage to bring the partner's attention to addressing impacts.
- **Introducing a Non-Essential Partner with Strong Standards:** Companies have involved the International Finance Corporation as a small percentage financier of a project, so they could reference their Performance Standards in project contracts and in broader discussions with project partners.

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MITIGATION EXAMPLES

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- **Strategic Role:** Some companies identify the committees with oversight of areas likely to be associated with salient human rights impacts associated with a JV (e.g. health and safety; procurement or sustainability), and ensure they play a strategic role in them, even when they are a minority partner.
- **Capacity Building:** A company may extend training and other capacity and awareness building activities to partners and/or industry players to enhance and to bolster the likelihood of their conducting adequate human rights due diligence.
- **Syndicated loans:**
  In the context of syndicated loans, responsible banks individually evaluate projects or borrowers against their own human rights and project-specific policies, including to address gaps between standards applied by the E&S (environment and social) coordinating bank and expectations under the UN Guiding Principles. Even where a bank has a smaller ticket in a syndicated loan, recognized expertise in the field of social impacts has allowed such banks to exert outsize leverage with other participating banks to ensure potential social impacts are adequately considered and addressed.
- In a major syndicated loan transaction, **ING** chose not to rely solely on the environmental and social due diligence conducted by the consultant to the lead bank, instead undertaking its own independent investigation. This included on-the-ground due diligence, allowing **ING** to assess the project's risks to people firsthand and form its own credit judgment.

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MITIGATION EXAMPLES

In focus: Technology relationships

- **Direct operational oversight:** Companies may retain direct responsibility for policy-setting, escalation and oversight of higher-risk operational functions even where aspects of delivery are outsourced.

- **Independent investigation rather than reliance on partner assessments:** Where technology products are deployed through enterprise customers or integrators, some companies undertake independent review of higher-risk use cases rather than relying solely on customer assurances. For example, some generative AI providers now require enhanced review and approval processes for higher-risk enterprise deployments involving biometric identification, law enforcement or critical decision-making systems.

- **Contractual audit and suspension rights:** Technology companies increasingly include contractual provisions allowing them to audit downstream use, investigate misuse, and suspend access where harms to people are foreseeable. For example, some generative AI providers reserve the right to suspend or terminate access where uses violate safety requirements or create heightened risks to people.

- **Embedding stronger governance requirements into partner relationships:** Some platform companies require business-critical partners to meet defined operational and rights-related standards as a condition of access. For example, app marketplace governance models operated by companies such as **Apple** require developers to comply with platform review and policy requirements before deployment.

- **Integrated escalation channels:** Companies may create mechanisms through which workers, users or affected stakeholders can raise concerns directly with the company even where operational functions are vendor-managed. Following scrutiny of outsourced moderation practices, some platforms have strengthened oversight of vendor-managed moderation functions.

- **Partner capability-building:** Companies may provide technical guidance, deployment protocols and risk-management training to downstream deployers and enterprise customers to strengthen capacity to identify and address harms associated with system use.

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ALTERNATIVE MODELS

There may be opportunities for increasing leverage to address actual and potential human rights impacts in a JV context through a coordinated approach. For example, in 2016 **BHP** created the Non-Operated Joint Ventures (NOJV) Asset within **Minerals Americas** in order to establish effective engagement with its JV partners and companies in line with BHP's Charter. The Asset creates a single point of accountability with responsibility for all non-operated joint ventures in **Minerals Americas** and its purpose includes having transparency over JV companies' risks and opportunities, in an active feedback process, whilst maintaining the JV company's management independence.

Tech alternative deployment model: Some AI developers have chosen API-based deployment models that retain ongoing monitoring, audit and suspension rights rather than distributing models without restrictions. By preserving direct relationships with deployers and retaining the ability to intervene where harms arise, these models seek to avoid accountability gaps associated with more diffuse deployment arrangements.

OTHER TOOLS AND RESOURCES

General:

- Shift (2015) Human Rights Due Diligence in High Risk Circumstances: Practical Strategies for Businesses: highlights strategies and practices that certain businesses have found most effective when conducting human rights due diligence in high risk circumstances. It includes "higher risk business relationships" such as those with business partners.
- Shift (2013) Using Leverage in Business Relationships to Reduce Human Rights Risks addresses various business relationships, including JVs.

Joint Ventures:

- IHRB (2012) Chapter 5: Respect for Human Rights in Joint Ventures Relationships of State of Play - Human Rights in Business Relationships: assists, inter alia, with identification and mitigation of human risks arising in connection with JV partners.

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OTHER TOOLS AND RESOURCES

Finance:

Project Finance:

- Shift (2018) Enhancing the Alignment of the Equator Principles with the UN Guiding Principles on Business and Human Rights: A Public Summary of Shift's Advice to the Equator Principles Association.
- Equator Principles (2020) Equator Principles EP4.
- Equator Principles (2020) Guidance note on Implementation of human rights assessments under the Equator Principles.
- Equator Principles (2020) Guidance note on evaluating projects with affected indigenous peoples.

Corporate Lending:

- IRBC Agreements, The Dutch Banking Sector Agreement (2019) DBA's Analysis of Severe Human Rights Issues in the Palm Oil Value Chain and Follow-up actions.
- IRBC Agreements, The Dutch Banking Sector Agreement (2019) Increasing leverage working group: Progress report phase I working group paper

Legal advice:

- **Responsible Contracting Project**: Practical guidance on structuring commercial contracts to allocate responsibility for labor and human rights risks across business relationships.
- The Chancery Lane Project: Model contractual drafting that demonstrates how legal agreements can embed accountability for environmental and social impacts rather than disclaiming responsibility.
- International Bar Association (2016) Practical Guide on Business and Human Rights for Business Lawyers and Business and Human Rights Guidance for Bar Associations.
- A4ID, The UN Guiding Principles on Business and Human Rights: A guide for the legal profession: provides an analysis, with case examples, of:
  - a law firms' implementation of rights and responsibilities in client relationships; and
  - the relationship between the UNGPs and codes of professional conduct for the legal profession.
- IBA, Handbook for company and commercial lawyers on Business and Human Rights: provides an explanation for lawyers about the links between different kinds of risks (drafted with help and advice from practitioners from some big law firms).

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OTHER TOOLS AND RESOURCES

AI/Data:

- OHCHR B-Tech Investor Engagement Tool (2023): Practical questions for assessing how technology business models may create "low-leverage relationship structures" that diffuse accountability for impacts on people.
- GNI/BSR Ecosystem and Human Rights Due Diligence Tool (ECO) (2022): Provides practical questions for identifying ecosystem dependencies, capability gaps and coordination challenges across distributed technology relationships that can limit visibility, leverage and effective response to harms.
- NIST AI Risk Management Framework (AI RMF 1.0): Practical framework for allocating governance, oversight and accountability across AI development and deployment chains; useful for assessing whether responsibilities are clearly assigned across layered technology relationships.
- ILO Digital Labour Platforms and the Future of Work: Examines how platform and outsourced operational models allocate responsibility across commercial actors, with direct relevance to RF15 questions around worker protections, leverage and accountability in distributed operating structures.
- **World Economic Forum's** Advancing Responsible AI Innovation: A playbook: Practical approaches to structuring AI contracts to retain accountability across commercial relationships.

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