



OECD Due Diligence Guidance for Responsible AI

A shared framework for identifying, preventing and addressing adverse impacts across the AI value chain

Risk-based

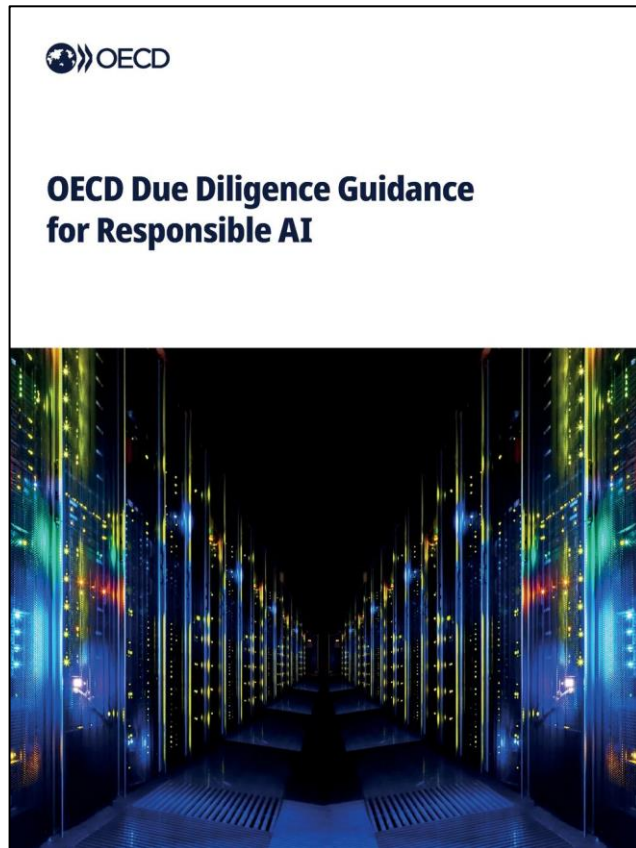
Whole-of-value-chain

Stakeholder-centred

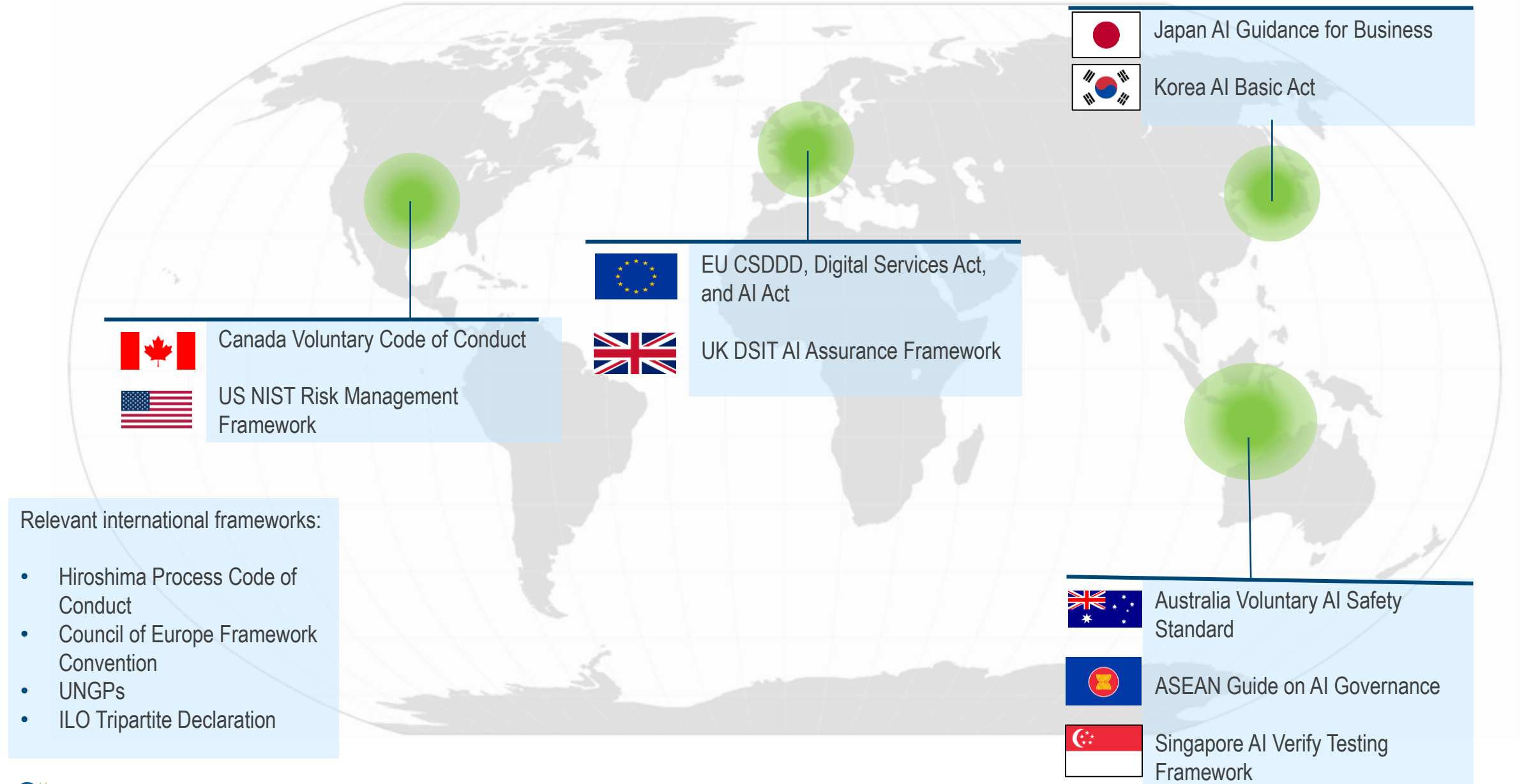
Interoperable

OECD Due Diligence Guidance for Responsible AI

Common approach to AI risk management, adopted by all OECD governments, the EU and 17 partner governments



- *Risk-based*
- *Covers human rights, environment and labour harms*
- *Emphasizes stakeholder engagement and transparency to build trust*
- *Tailored to size & circumstances of the company*
- *Takes into account the entire value chain*



Impacts occur along the entire AI value chain

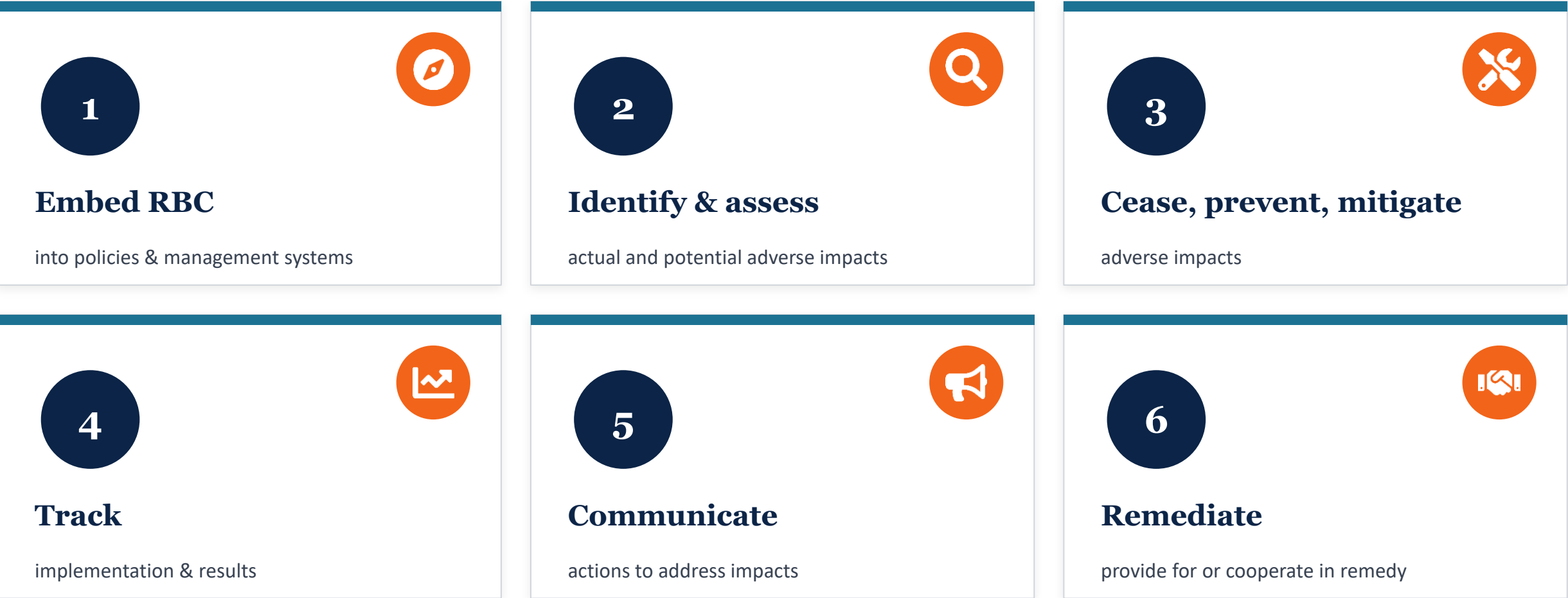
Due diligence must cover the whole chain — not just the moment of deployment.



EXAMPLES OF ADVERSE IMPACTS ALONG THE CHAIN



Six steps — iterative, not linear



Simultaneous and iterative — due diligence is both proactive and reactive.

Embed RBC in policies & systems

Make responsible business conduct part of the way you run the business — not an add-on.

1.1 RBC policies

- Commit publicly to OECD AI Principles & MNE Guidelines
- Develop policies with active stakeholder input

1.2 Internal management systems

- Assign AI due-diligence oversight to senior management
- Create cross-functional committees & training
- Integrate sustainability and responsible AI with other operations (legal, HR, procurement, sales)
- Set up incident monitoring and whistleblower channels

1.3 Expectations on business relationships

- Communicate RBC expectations to suppliers, partners & users
- Pre-qualify on RBC-relevant issues
- Provide resources to SMEs to meet expectations
- Review purchasing practices that create barriers

What good looks like

- Policy commitment visible on corporate website
- Named accountable executive at board level
- Risk register updated on a regular cadence
- Suppliers trained, contracts updated, feedback loops open

Identify & assess adverse risks

Scope broadly, then go deep on the most significant risks — in your own operations and via your business relationships.

2.1 Initial scoping

- Map AI systems across lifecycle & value chain
- Gather signals: audits, incident data, civil-society reports
- Consider dual-use and reasonably foreseeable misuse
- Escalate high-risk cases for deeper analysis

2.2 In-depth assessment

- Review TEVV: test, evaluate, verify, validate
- Examine data quality, privacy & security at all levels
- Engage workers, users & affected communities
- Check KYC & end-use for high-risk deployment

2.3 Assess involvement: cause · contribute · linked

- Cause: your own operations create the impact
- Contribute: your activity substantially facilitates it
- Directly linked: impact flows via a business relationship
- Involvement can evolve — reassess regularly

2.4 Prioritise severe risks

- Severity = scale × scope × irremediability
- Weigh likelihood alongside severity
- Be transparent about the prioritisation rationale
- Return to less severe risks once salient ones are handled

Cease, prevent & mitigate adverse impacts

Act on what you find. Response must be proportionate to involvement, severity and capacity.

3.1 Risks you cause or contribute to

- Stop the activity or contribution
- Strengthen management systems & safeguards
- Update policies with stakeholder input
- Build a roadmap where immediate cessation isn't feasible

3.1 Responsible sourcing, training & (cont) deployment

- Data quality, privacy-preserving techniques
- Transparency, explainability, traceability
- Security, robustness, red-teaming
- Gradual deployment & clear response plans

3.2 Risks directly linked via business relationships

- Use and, where needed, build leverage
- Embed expectations in contracts & incentives
- Collaborate with peers in line with competition law
- Disengage responsibly only as a last resort

Practical guardrails

- User-based restrictions, rate & capability limits
- Content authentication & provenance mechanisms
- Temporary or permanent suspension protocols
- Feedback & appeal channels for end users

Steps 4 · 5 · 6 — track, communicate, remedy

STEP 4

Track



Monitor implementation and effectiveness.

- Record performance over the AI lifecycle
- Share incident learnings with stakeholders
- Run periodic internal or third-party reviews

STEP 5

Communicate



Report externally on what you are doing.

- Publish policies, processes and outcomes
- Explain prioritisation and stakeholder engagement
- Disclose capabilities, limits and appropriate uses
- Tailor information to different audiences

STEP 6

Remedy



Provide for or cooperate in remedy.

- Restitution, compensation, rehabilitation
- Satisfaction and guarantees of non-repetition
- Direct, judicial, state-based & non-state mechanisms
- Use leverage for linked impacts via partners

Building trust through stakeholder engagement

Meaningful stakeholder engagement runs through every step.

✓ **Two-way**

Conducted in good faith, responsive to stakeholder views.

✓ **Timely**

Input before major decisions, not after the fact.

✓ **Informed**

Truthful, complete information in accessible form.

✓ **Inclusive**

Prioritise those most vulnerable to adverse impacts.

WHERE TO ENGAGE

Engagement across the AI development lifecycle

- Product purpose & design decisions
- Dataset curation & validation
- Training & testing
- Post-deployment evaluation
- Worker training when AI manages their work
- Multi-stakeholder initiatives & audits

A tool to navigate existing AI frameworks

Each step in the Guidance maps to related provisions in leading AI risk-management frameworks.

OECD DDG Step	EU AI Act	US NIST AI RMF	ISO/IEC 42001	UNGPs
1 — Embed RBC	Art. 9, Art. 17	Govern	4–10, Annex A.2	Principles 15–16
2 — Identify & assess	Art. 9(2), Art. 55(1)	Map 1–5	6, 8, Annex A.5	Principles 17–18
3 — Cease, prevent, mitigate	Art. 9(2a), Art. 50, 55	Manage 1–4	6.1.3, 8.3, Annex A.5	Principle 19
4 — Track	Art. 9(5–8), Art. 72	Measure 1, 4	8.1, 9, 10	Principle 20
5 — Communicate	Art. 13, Art. 53	Manage 4	7.4, Annex A.6, A.8	Principle 21
6 — Remedy	—	—	—	Principles 22, 29–31

Meaningful implementation of these frameworks will cover many, though not all, of the RBC due diligence expectations — particularly on stakeholder engagement and remedy.