



National Contact Point for Responsible
Business Conduct
Sweden

FINAL

Specific Instance: Justice for Iran – Axis Communications Final statement from the Swedish NCP

Date (27/11/2025)

This is the final statement of the Swedish National Contact Point for Responsible Business Conduct (NCP) regarding the case between the Justice for Iran and Axis Communications AB. The NCP decided on an initial assessment in the case on April 25, 2025.

As noted in the Implementation Procedures to the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct* (the Guidelines), following the conclusion of a specific instance and after consultation with the parties involved, the NCP will make the results of the procedures publicly available.

In this specific instance good offices were offered and accepted by both parties. This statement describes the issues raised and the process as well as the outcome of the “good offices” held, including recommendations made by the NCP to the enterprise.

As specific instances are not legal cases and NCP’s are not judicial bodies, NCP’s cannot directly order compensation nor compel parties to participate in a conciliation or mediation process.

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Overview of the NCP and its role

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct are the leading international standard for how companies and investors should address their impacts on people, the

planet and society. They apply to businesses and investors of all sectors, sizes and ownership structures, and cover all key sustainability issues. As of 8 June 2023, all OECD Members are Adherents, as well as Argentina, Brazil, Bulgaria, Croatia, Egypt, Jordan, Kazakhstan, Morocco, Peru, Romania, Tunisia, Ukraine and Uruguay. The European Community has been invited to associate itself with the section on National Treatment on matters falling within its competence.

The *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct* are recommendations addressed by governments to multinational enterprises. They aim to encourage positive contributions enterprises can make to economic, environmental and social progress, and to minimise adverse impacts on matters covered by the Guidelines that may be associated with an enterprise's operations, products and services. The Guidelines cover all key areas of business responsibility, including human rights, labour rights, environment, bribery, consumer interests, disclosure, science and technology, competition, and taxation. The 2023 edition of the Guidelines provides updated recommendations for responsible business conduct across key areas, such as climate change, biodiversity, technology, business integrity and supply chain due diligence, as well as updated implementation procedures for the National Contact Points for Responsible Business Conduct.

The National Contact Points (NCP) for Responsible Business Conduct have a dual mandate, to raise awareness and promote observance of the Guidelines, as well as to contribute to the resolution of issues that arise relating to the implementation of the OECD Guidelines. The NCP contributes to the resolution by e.g. offering good offices, and where applicable, issuing determinations, recommendations, and carrying out follow up.

To support implementation in specific instances, paragraph C-1 and 2 of the Guidelines notes:

“The NCP will, serving as a non-judicial grievance mechanism, contribute to the resolution of the issues that arise relating to the implementation of the Guidelines in specific instances in a manner that is consistent with the core effectiveness criteria listed in Section I.A above. NCPs will publish their case-handling procedures, i.e. procedures they follow in handling specific instances, which will be consistent with these Procedures. NCPs are encouraged to consult their stakeholders, in developing their case-handling procedures. The NCP will offer a forum for discussion and its expertise on the Guidelines to assist the business community, worker organisations, other non-governmental organisations, and other interested parties concerned to resolve the issues raised in an efficient and timely manner and in accordance with the applicable law and the Guidelines. Depending on the characteristics of each case, this assistance may include supporting constructive dialogue, facilitating agreements between parties and/or issuing recommendations. The aims of such assistance may include furthering the implementation of the Guidelines in the future and/or addressing adverse impacts in a way consistent with the Guidelines.

In providing this assistance the NCP will:

1. Where other NCPs are concerned due to the characteristics of the Specific Instance, coordinate in good faith with them to choose the lead and supporting NCPs
2. Consult the parties on the issues raised and make an initial assessment of whether these issues warrant further examination and respond to the parties involved.”

Source: OECD (2023), *OECD Guidelines for Multinational Enterprises*

Executive Summary

The complaint was received January 11th 2025 and submitted by Justice for Iran (JFI)/Justice Beyond Borders, a non-governmental organisation based in London, UK. The complaint regards Axis Communications.

The issues raised in the complaint, relates to:

Chapter II. General Policies.

- II.A.2. “Respect the internationally recognised human rights of those affected by their activities.”
- II.A.11. “Carry out risk-based due diligence, for example by incorporating it into their enterprise risk management systems, to identify, prevent and mitigate actual and potential adverse impacts as described in paragraphs 12 and 13, and account for how these impacts are addressed. The nature and extent of due diligence depend on the circumstances of a particular situation.”
- II.12. “Avoid causing or contributing to adverse impacts on matters covered by the Guidelines, through their own activities, and address such impacts when they occur, including through providing for or co-operating in the remediation of adverse impacts.”

Chapter IV. Human Rights.

- IV.1. “Respect human rights, which means they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.”
- IV.2. “Within the context of their own activities, avoid causing or contributing to adverse human rights impacts and address such impacts when they occur.”
- IV.4. “Have a publicly available policy commitment to respect human rights.”
- IV.5. “Carry out human rights due diligence as appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts.”

Coordination with any other NCP has not been regarded as relevant.

The initial assessment determined that the issues raised in the specific instance did merit further examination. The decision was based on an initial assessment of the information submitted and did not represent a conclusion as to whether the enterprise observed the Guidelines or not.

The procedure followed by the Swedish NCP consisted of arranging separate meetings with the complainant and the enterprise. The parties were offered and accepted to have a dialogue through meeting within the realm of “good offices”. The NCP facilitated the dialogue, and the parties agreed to continue their collaboration by agree on a common approach forward. The agreement will serve both parties as well as it promotes the guidelines of the OECD. A follow up will be carried out within one year following the date of decision of this final statement.

Substance of the submission (circumstances presented) and the enterprise’s response

Justice for Iran raised issues with Axis Communications video surveillance products allegedly being used to violate human rights in Iran. JFI claimed that Axis Communications CCTV cameras are largely available in Iran and used by the government to identify protesters and women who defy compulsory hijab. The complaint connected the issues raised to Chapter II General Policies,

paragraphs 2, 11 and 12 as well as Chapter IV Human rights, paragraphs 1, 2, 4 and 5 in the Guidelines.

To verify their complaint, JFI has submitted examples of their statements by referring to an Iranian company claiming to use Axis products, links to a photograph of Axis Communications training Iranian companies in surveillance and video monitoring in 2023 as well as a link to a video of Iranian police using Axis traffic cameras to identify women without hijab.

Furthermore, JFI claims that Axis Communications does not have a human rights policy or commitment to human rights expressed on its website.

JFI aims to request the company to cease and desist all alleged business with Iran and related entities who use their technology to violate human rights.

Axis Communications informed the NCP that no Axis products are being sold and no sales of Axis solutions may be carried out in Iran, neither by Axis communications nor their contracted distributors, and that they comply with all applicable export control and sanctions legislations in their exports. Additionally, Axis carries out systematic screening of customers to prevent violations.

However, until 2020, Axis sold cameras to a distributor with Iran included in its distribution territory. Axis underlines that this means that before 2020, their cameras could have been sold to the Iranian government and other entities in Iran. To prevent their products being used in regions submitted to sanctions legislation, Axis has expressed that they now use geo-blockers that prohibits any firmware and software updates to their products in Iran.

With reference to the issues raised regarding training sessions held by Axis in Iran in 2023, Axis dismisses the image that was provided by JFI as wrongfully dated. In their response, Axis assures that no training has been carried out in Iran since 2017.

Axis provided the NCP of links to its Human Rights Policy (published 2024), Code of Conduct, Export Control Policy and annual sustainability report.

In their response, Axis encouraged an open communication and welcomed a further dialogue with JFI.

Timeline of the proceedings of the NCP to date

Since receipt of the submission, the NCP has carried out the following actions:

Date	Action that occurred
11.01.2025	<i>Submission received</i>
14.01.2025	<i>NCP confirmed the receipt of the submission</i>
20.01.2025	<i>NCP contacted Axis Communications with the request for a contact person at Axis Communications.</i>
20.01.2025	<i>Axis Communications provided a name and contact details for the contact person</i>
21.01.2025	<i>Axis Communications was notified of the complaint by NCP</i>
05.02.2025	<i>Axis Communications responded to the submission</i>
23.01.2025	<i>NCP secretariat informed members of the NCP of the specific instance</i>

05.02.2025	<i>Meeting with Justice for Iran to explain NCP process and let the submitter to add details to the file</i>
13.02.2025	<i>Meeting with Axis to explain NCP process and let the enterprise to add details to the file</i>
13.02.2025	<i>Meeting with NCP, with the participation of Justice for Iran</i>
04.03.2025	<i>Meeting with NCP, with the participation of Axis Communications</i>
11.03.2025	<i>Meeting with NCP which decided to draft an initial assessment</i>
02.04.2025	<i>Draft initial assessment shared with the NCP</i>
09.04.2025	<i>Meeting with NCP, first discussion on the draft initial assessment</i>
09.04.2025	<i>NCP provided comments received on the draft initial assessment</i>
14.04.2025	<i>Draft initial assessment shared with the parties</i>
15.04.2025	<i>Justice For Iran provided comments received on the draft initial assessment</i>
22.04.2025	<i>Axis Communications provided comments received on the draft initial assessment</i>
25.04.2025	<i>NCP decided on the initial assessment</i>
09.06.2025	<i>Good offices provided, participation by both parties in person, in Stockholm</i>
07.07.2025	<i>Both parties agreed on a common statement</i>
10.09.2025	<i>Meeting with the Swedish NCP on the case handling</i>
26.09.2025	<i>Draft final assessment shared with the NCP for comments</i>
13.10.2025	<i>NCP accepted the draft final assessment</i>
15.10.2025	<i>Draft final assessment shared with the parties</i>
15.10.2025	<i>Axis Communication provided comments received on the draft final assessment</i>
17.10.2025	<i>Justice For Iran accepted the facts as written and provided no further comments on the draft final assessment</i>
31.10.2025	<i>Written procedure of the NCP regarding the draft of the final statement</i>
19.11.2025	<i>Meeting with NCP, decision taken of the final statement</i>
27.11.2025	<i>Final assessment published</i>

All documents submitted were shared with the parties.

Outcome of the initial assessment by the NCP

The NCP decided to accept the submission. This decision followed an assessment by the NCP as to whether the issues raised are i) “bona fide”, i.e. real or authentic and ii) relevant to the implement of the Guidelines, i.e. within the scope of the Guidelines. The Swedish NCP concluded that the submission did merit further consideration based on the criteria in para 25 of the commentary on the procedural guidance.

The Swedish NCP accepted the case as lead NCP for further examination and offered its good offices to the parties. The parties expressed an interest to engage in a dialogue.

The conclusion is based on information received from both parties. The Swedish NCP does not express an opinion on the correctness of the statements. Neither does the NCP express an opinion on the validity of the documentation provided by the parties.

Good Offices

The NCP facilitated the “good offices” scheduled on June 9th 2025 at the premises of the Ministry of Foreign Affairs in Stockholm. Both parties participated in person. A constructive dialogue was held with the possibility for both parties to present their cases. This resulted in a common interest to further engage between the parties on a bilateral basis.

After having had their first bilateral meeting, the parties reached and shared the following common statement: *In the spirit of cooperation and given the potentials and challenges that different types of technology pose, Justice for Iran/Justice Beyond Borders and Axis Communications agree to continue to hold dialogues on issues relating to technology and human rights.*

Recommendation and conclusion

The NCP encourage both parties to continue their dialogue and to exchange information in accordance with the common statement on cooperation.

The parties have expressed an interest to engage in a bilateral dialogue. The NCP will be of assistance if needed and asked for by the parties. A follow up meeting will be scheduled between the NCP and the parties within one year from the date of decision of this final statement.