
HREDD approach

Stedin Group

Human Rights & Environmental Due Diligence approach
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1. Introduction

Stedin is working towards an environment filled with new energy for current and future generations. Every day, we strive to ensure grid access for all. By speeding up construction, improving grid efficiency, and ensuring high-quality management, contribute to drive the Netherlands' sustainability efforts. Yet a living environment filled with new energy goes much further than that. Energy is what we supply – literally and figuratively.

- Energy to build the sustainable grid of the future
- Energy to work with us in a safe and supportive environment
- Energy to work with us honestly and transparently

This is something we are doing together with our employees, who feel that they can and should work hard for our living environment.

Since 2025, Stedin Group has adopted a Human Rights and Environmental Due Diligence (HREDD) approach. Through this approach we identify, prevent, mitigate, and account for actual and potential adverse impacts on human rights and the environment in our own operations, supply chain, and business relationships, and to enable remediation where appropriate. This is not only a legal requirement, but also an essential part of responsible business conduct, and of our mission to realize a sustainable energy system.

1.1. International frameworks for Human Rights & Environmental Due Diligence

Our HREDD approach is based on internationally recognized standards, including:

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- United Nations Guiding Principles on Business and Human Rights (UNGPs)

In addition, our approach aligns with the European sustainability framework, such as the Corporate Sustainability Reporting Directive (CSRD), the proposed Corporate Sustainability Due Diligence Directive (CSDDD), and the EU Taxonomy for sustainable economic activities. These frameworks are embedded in our Procurement policy (only available in Dutch: Inkoopbeleid) and provide the foundation for contractual requirements and supplier assessments.

1.2. Operational Implementation

We actively collaborate with suppliers, civil society organizations, and other stakeholders to jointly address risks and report transparently on our progress. Our approach is dynamic: each year we evaluate and continuously improve it based on new insights, legislation, and stakeholder feedback. Stedin's Human Rights & Environmental Due Diligence process follows the six steps outlined in the OECD framework:

1. Integrate Responsible Business Conduct into policies and management systems.
2. Identify and assess adverse impacts.
3. Cease, prevent, or mitigate adverse impacts.

4. Track progress.
5. Communicate results.
6. Provide for remediation.

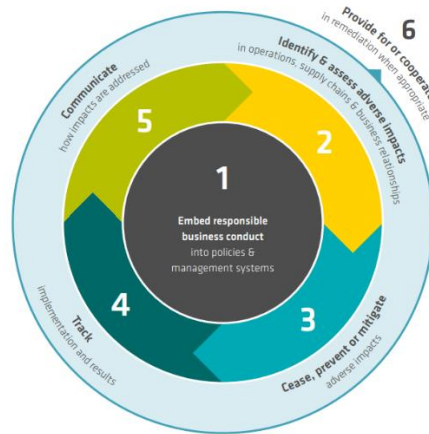


Figure 1: Graphic representation of the six steps in the OECD Guidelines

Stakeholder dialogue is a continuous activity and is embedded in all steps of the due diligence process. This document explains, step by step, how Stedin Group implements and continuously develops this approach.



2. The six steps of HREDD

2.1. Step 1 – Integrate Responsible Business Conduct into policies and management systems

Integrating HREDD into policies and management systems is essential to systematically manage ESG risks and achieve our strategic goal—a sustainable energy supply. This integration ensures that human rights and environmental aspects are not treated as isolated topics but are embedded in our daily operations.

2.1.1 Governance and responsibilities

Stedin Group has an ESG strategy which is periodically updated. Implementation of this strategy is secured through a governance structure in which various departments collaborate and report. The ultimate responsibility for due diligence in the supply chain lies with the Director of Supply Chain. ESG specialists conduct risk analyses and supplier assessments on ESG topics. Different teams, depending on the subject, ensure compliance with sustainability criteria in practice.

2.1.2 Policy Instruments

Stedin Group has an integrated [ESG Strategy](#) that guides our sustainability ambitions and risk management.

For Environmental themes (E-themes), Stedin recognizes that climate action is necessary to combat global warming, biodiversity loss, and resource depletion. As a regional grid operator, Stedin accelerates the energy transition by building networks faster, optimizing their use, and managing them responsibly, with consideration for the environment. This rapid execution can cause a negative impact on biodiversity and local ecosystems. Stedin strives for solutions that combine positive climate impact with minimal negative effects. We focus on Climate Mitigation, Circular Material Use, and Biodiversity in the supply chain. This is how we construct, utilise and manage in an environmentally friendly and sustainable way.

For Social themes (S-themes), Stedin aims for Good Employment Practices. Good Employment Practices focus on three themes. First of all, educating, learning and development of our employees. Facilitating the energy transition requires significant effort in execution and continuous adaptation to changes within the work environment. To support this, Stedin offers extensive development and learning opportunities, enabling employees to keep developing in line with strategic challenges. Secondly, the health and safety of our employees. In the coming years, the workload for our employees will increase significantly, demanding a lot both physically and mentally. Stedin seeks to raise awareness and empower employees to take ownership of their employability. Finally, we aim to be a diverse and inclusive organization by 2030. We achieve this by attracting and retaining a diverse workforce that reflects the society we serve. Stedin translates these principles of Good Employment Practices into its supply chain, as laid down in the Supplier Code of Conduct.

Stedin operates with integrity and transparency to safeguard trust. Governance (G-themes) focuses on acting ethically, transparently, and in compliance with laws and regulations. We aim to prevent our solutions in the Netherlands from causing issues elsewhere in the world, and wherever possible, we seek to mitigate existing problems. This commitment extends to our collaboration with supply

chain partners. Sustainability, fairness, and balanced decision-making are central to all our business relationships. In this way, we build, utilize, and manage our assets with integrity, transparency, and fairness.

The ESG strategy forms the foundation for our Human Rights & Environmental Due Diligence (HREDD) process. Due diligence operationalizes strategic ambitions by systematically identifying, preventing, and mitigating risks in the supply chain. This ensures that our ESG goals are not only policy-based but demonstrably implemented in procurement, contract management, and supplier relationships. Through this linkage, we comply with international standards (OECD, UNGPs) and European sustainability laws (CSRD, CSDDD) and strengthen our social responsibility.

Sustainable procurement to achieve the objectives of our ESG strategy is embedded in the following documents:

- Procurement Policy, Responsible Sourcing Policy, and Sustainable Procurement Handbook (internal)
The Procurement Policy, the Responsible Sourcing Policy (RSP), and the operationalization of sustainable procurement as set out in the internal Handbook, guide the selection and evaluation of suppliers and includes ESG criteria. These documents supporting sustainable procurement are periodically updated and shared with internal stakeholders. They serve as a core instrument for due diligence as recommended by the OECD Guidelines.
- Supplier Code of Conduct
Suppliers must sign this Code of Conduct when entering into a contract. The code contains concrete guidelines for responsible, sustainable, and ethical business practices. Compliance is contractually required and actively monitored.
- ESG Audit procedure (internal)
The ESG Audit procedure provides Stedin employees with a structured yet flexible framework to identify, assess, and follow up on ESG risks and potential violations among suppliers. The document includes guidance for risk classification based on severity and likelihood, including a matrix that determines priorities and action plans. For each scenario, the protocol outlines concrete steps—from verification, communication, and audit to corrective measures, escalation, and reporting—with clear timelines. It also offers tools for internal and external audits, an audit template with scope and methodology, an ESG risk management questionnaire for suppliers, and a comprehensive checklist to systematically assess compliance with ESG standards. This procedure supports Stedin’s commitment to responsible supply chain management, transparency, and collaboration, in line with international standards and legislation.

In addition, Stedin Group has an internal Human Rights Policy and a corresponding publicly available Human rights Statement, both adopted by the Executive Board in December 2024. These documents underscore our commitment to respecting universal human rights in all our activities and throughout the entire supply chain. The policy is based on Dutch laws and regulations and international standards, including the Universal Declaration of Human Rights, ILO Conventions, the OECD Guidelines, and the UN Guiding Principles on Business and Human Rights.

- The Human Rights Policy translates these principles into concrete obligations and practical measures. It focuses on three core priorities: health and safety, equal treatment and non-discrimination, and freedom and self-determination. We commit to providing a safe working environment, preventing child labour and forced labour, respecting freedom of association, and protecting privacy. We also expect our suppliers and other partners to adhere to the same standards, as reflected in the Supplier Code of Conduct.

- The Human Rights Statement makes our ambitions and principles transparent to customers, suppliers, and other stakeholders.

Both documents form the foundation of our due diligence process, in which we identify, mitigate, and—where necessary—remediate risks of human rights violations and environmental harm in our supply chains.

Additionally, Stedin Group has a Code of Conduct for employees. This code relates to our personal behaviour and responsibility. The Stedin Group Human Rights Policy, the Corporate Governance Code, Stedin’s societal role given its public mandate, and applicable laws form the basis of this Code of Conduct. By adhering to the Code of Conduct, we keep the company healthy for the long term and create value for society.

2.1.3 Training and capacity building

Employees with procurement responsibilities attend mandatory training sessions on ESG and HREDD delivered by Stedin’s ESG specialists. These trainings are continuously updated to integrate new legislation, emerging risks, and best practices. This strengthens our ability to identify and mitigate ESG risks in a timely manner. For each procurement category (per value stream within the procurement department), an ESG specialist provides guidance and supports tender processes.

2.1.4 Continuous improvement and transparency

Our policy and related procedures are dynamic: they are periodically evaluated and adjusted based on new insights, legislation, and stakeholder feedback. We communicate changes and relevant updates to suppliers and internal teams to ensure transparency and compliance.

2.2. Step 2 – Identify and assess adverse impacts

Stedin identifies and assesses potential risks and negative impacts in our supply chain to protect people, the environment, and society. Insights gathered through various initiatives are eventually consolidated in our internal HREDD risk overview. This is done in line with OECD Guidelines and our ESG strategy.

2.2.1 Risk analysis and Value chain assessment

Stedin conducts Value chain assessments to map our supply chains and identify potential risks. This is done in close collaboration with our suppliers, with multiple contact moments in the process. Together, we develop approaches for greater transparency or improvements. By doing so, Stedin can jointly develop approaches with its suppliers to improve transparency or implement improvements. The Value chain assessments are based on the OECD Guidelines and consist of three steps:

1. **Category Identification**
We identify procurement categories that are part of Stedin’s core activities and assess which categories carry an elevated risk related to Environmental, Social, or Governance topics. This includes factors such as product type, sector, and geographic location.
2. **Prioritization and analysis at raw material level**
For prioritized product groups, we analyse items and raw materials based on criteria such as volume, recycled content, and country risk.

3. Supplier Selection

We select suppliers for these assessments based on factors such as production locations, accessibility of information, and procurement volume.

Subsequently, we discuss the findings with the relevant supplier and jointly formulate action points. The Grievance mechanism (see section 2.6.1) will provide early warning signals, which we will investigate and, where necessary, incorporate into the risk analysis process.

The insights we gain through Value chain assessments feed into our overall risk analysis and also inform the double materiality analysis. They give us visibility into the risks associated with the materials we use, the countries where production takes place, and the social and environmental risks at different stages of production. In addition, they provide insight into the impact of specific human rights and environmental risks within our supply chain.

2.2.2 Transparency about materials and production locations

Together with Enexis and Alliander, we developed a method for a Raw Material Passport (in Dutch: Grondstoffenpaspoort, GSPP), certified by KIWA. This provides insight into materials used and the percentage of circular content, enhancing transparency in line with OECD recommendations. We also map production locations of Tier 1 and Tier 2 suppliers. Suppliers provide location lists, enabling us to assess country risks and take appropriate measures.

2.2.3 Social and governance audits

Social and governance audits are part of our due diligence process and are risk-driven. This implies that audits occur only when a supplier or category risk profile warrants it, as outlined in our ESG Audit procedure (only available in Dutch: ESG Auditprocedure). Audits may take place before tendering or during contract execution (see section 2.3.2). Where relevant, we collaborate with other grid operators to increase efficiency and impact.

2.2.4 Stakeholder dialogue

We engage with employees, customers, suppliers, NGOs, trade unions, and Rights-holders to discuss risks and improvement opportunities. From 2026 onward, this dialogue will be structured, and insights will inform ESG policy, risk assessment, and remediation mechanisms.

2.2.5 Use of external data sources

We monitor risks using tools such as the CSR Risk Check. This information is combined annually with Value chain assessments and other insights and included in our internal HREDD risk overview. This enables us to undertake proactive risk management during market exploration and contracting.

2.3. Step 3 – Cease, prevent, or mitigate adverse impacts

Stedin takes measures to identify, prevent, and mitigate actual and potential adverse impacts in our value chain—and, where necessary, to enable remediation. We do this in line with the OECD Guidelines for Multinational Enterprises and our ESG principles.

2.3.1 Contractual Safeguards

To prevent actual and potential adverse impacts in our supply chain, we embed ESG criteria in contracts with suppliers. These contractual provisions include, among others:

- Human rights and environmental clauses: Suppliers must comply with international standards such as the OECD Guidelines and the UN Guiding Principles.
- Corrective Action Plans: In case of identified shortcomings, we jointly develop an improvement plan with the supplier, including clear timelines and responsibilities.
- Sanctions for non-compliance: If remediation is not possible or agreements are repeatedly violated, we reserve the right to suspend or terminate the collaboration.

By explicitly including these provisions, we ensure transparency and establish a clear basis for preventing and mitigating risks in the supply chain and achieving structural improvements.

2.3.2 Audit protocol following identified adverse impacts

To ensure the effectiveness of our due diligence processes, we apply a risk-based ESG audit protocol, as described in the **ESG Audit procedure** (see section 2.1.2), which is applied in cases of identified adverse impacts or critical risks. Audits are initiated when signals from Value chain assessments, media analysis, Grievance mechanisms, or Stakeholder dialogue indicate severe negative impacts. The protocol includes:

Preparation: Selection of audit targets based on severity and likelihood scores, sector risks, and previous incidents.

Execution: Audits conducted according to the ESG Audit Protocol Template, including document review, interviews, and on-site inspections. Depending on the classification, internal or external experts are engaged.

Follow-up: Corrective Action Plans (CAP) with clear timelines, interim monitoring, and re-audits to ensure compliance and improvements.

The protocol is periodically reviewed based on new insights and lessons learned. Gender equality, non-discrimination, and human rights are integral components of the audit checklist and questionnaire.

2.3.3 Collective projects in the supply chain

We collaborate with other grid operators and industry associations on sector-wide initiatives to address structural risks. This cooperation increases our leverage with suppliers and aligns with OECD recommendations for collective action on complex supply chain issues.

2.3.4 Proactive monitoring

- Using advanced risk analysis tools, including news scraping and external databases, we continuously monitor production sites within our supply chain. In addition, we will leverage signals from the Grievance mechanism (see section 2.6.1) to identify risks at an early stage and to monitor whether our risk mitigation measures are delivering the intended results. This enables us to: Detect new risks early;
- Plan preventive measures before formal audits;
- Address incidents quickly and effectively.



2.3.5 Sectoral Collaboration

Stedin actively collaborates with other grid operators, industry associations, NGOs, and government bodies through the International Responsible Business Conduct Agreement for the Renewable Energy Sector (in Dutch: IMVO-convenant voor de Hernieuwbare Energiesector), facilitated by the SER (Social and Economic Council). This covenant combines forces to jointly address and prevent risks of human rights violations and environmental harm in international supply chains.

The benefits of this collaboration include:

- **Collective leverage:** Acting at a sector-wide level increases our influence with suppliers and enables us to address complex supply chain challenges more effectively.
- **Joint projects:** The Agreement initiates projects that identify specific risks and address adverse impacts, such as forced labour, child labour, and gender inequality.
- **Knowledge sharing and tools:** Participants develop due diligence tools, such as questionnaires and assessment frameworks, that can be directly applied in our processes.
- **Enhanced transparency:** Collaboration makes it possible to improve supply chain transparency and implement structural improvements.
- **Embedding international standards:** The covenant is based on the OECD Guidelines and UN Guiding Principles, ensuring our approach aligns with international best practices.

Through this collaboration, we contribute to a responsible energy transition and strengthen our own HREDD approach with practical tools and sector-wide standards.

2.3.6 Supplier capacity building

To structurally prevent adverse impacts, we invest in strengthening knowledge and capacity among our suppliers. We do this by:

- **Sharing knowledge on human rights and safe working conditions:** Suppliers receive practical guidance to comply with international standards such as the OECD Guidelines and UN Guiding Principles.
- **Circular principles and environmental awareness:** We support suppliers in applying circular solutions and reducing environmental impact.
- **Stedin Supply Chain ESG Award:** To encourage positive behavioural change, we have introduced the annual Stedin ESG Award. This award recognizes suppliers who excel in sustainability, human rights, and innovation. It serves both as recognition and as inspiration for other suppliers to adopt best practices.

Through this approach, we not only increase compliance with our ESG criteria but also contribute to sustainable improvements across the entire value chain.

2.4. Step 4 – Track progress

We continuously monitor and evaluate the effectiveness of our measures to reduce risks in the supply chain through audits, performance management, and KPIs, in line with the OECD Guidelines (Step 4).

2.4.1 Continuous monitoring and follow-up

When audits or Value chain assessments reveal deviations, we agree a Corrective Action Plan with the supplier. Depending on the severity, a timeline is set to address the adverse impact. Within the period defined in the ESG Audit Procedure, a follow-up audit or meeting verifies implementation of the improvements.

The follow-up on audit findings is documented and monitored by the ESG specialist, as well as discussed with the supplier. Besides that, we discuss findings in Value chain assessments and agree on remediation actions. If improvements fail to materialize, additional measures follow, such as intensive support or a review of the collaboration.

2.4.2 Structured ESG performance reviews

ESG specialists periodically review progress on ESG KPIs with the contract owner and supplier manager, as defined in our ESG strategy.

2.5. Step 5 – Communicate results

Transparency is a core principle of our HREDD approach. We actively communicate about our policies, processes, and results, in line with the OECD Guidelines and CSRD requirements.

2.5.1 CSRD reporting

Each year, we report on our ESG progress, following the Corporate Sustainability Reporting Directive (CSRD). We provide transparency about both achievements as well as challenges.

2.5.2 Stakeholder dialogue and external communication

We actively share relevant information regarding our due diligence policies, processes, and activities, including outcomes of implemented measures. We also hold Stakeholder dialogues, with the aim to integrate stakeholder insights into risk assessment and due diligence processes.

2.6. Step 6 – Provide for remediation

Stedin recognizes the importance of effective remediation measures when adverse impacts occur, caused by business activities. In line with the OECD Guidelines (Step 6), we work with suppliers and stakeholders to remedy identified or reported harm to people or the environment. Remediation can take various forms, such as:

- Adjusting processes to prevent recurrence.
- Providing guarantees and implementing corrective actions within a defined timeframe.
- Engaging with Rightsholders and local partners to deliver sustainable solutions.

The contract owner coordinates remediation measures with legal experts and ensures compliance with applicable laws and regulations. From 2026, implementation of remediation measures will be systematically integrated into our performance management process.

2.6.1 Grievance mechanism as access to remedy

We currently have a Grievance mechanism for employees, suppliers, and customers. In 2026, we will explore expanding its scope, in order to implement an operational Grievance mechanism in line with OECD recommendations. This mechanism provides employees, suppliers, customers, local communities, and other stakeholders with an accessible, transparent, and safe channel to submit complaints regarding adverse impacts of business activities.

Key features we will incorporate:

- Accessibility for vulnerable groups and multilingual support.
- Protection against retaliation, including explicit safeguards for Human Rights Defenders.
- Confidentiality and transparency in case handling.
- Integration with risk management: signals from the Grievance mechanism will be used as early warnings in Step 2 (Identify) and Step 3 (Mitigate).

By means of this mechanism, we aim to provide a channel for early detection of adverse impacts (Step 2) and a tool to monitor risk mitigation (Step 3), while ensuring Rights-holders have effective access to remediation, in line with international best practices.

3. Due diligence as a continuous process

Our approach to Human Rights & Environmental Due Diligence (HREDD) is not a one-off activity but an ongoing process. Risks in the supply chain are constantly evolving due to geopolitical developments, technological innovations, and societal expectations. Therefore, we continuously strive to improve our processes.

3.1. Continuous improvement

We periodically evaluate our due diligence approach and adjust it based on new insights from:

- Supply chain assessments and audits.
- Signals from grievance mechanisms and stakeholder dialogues.
- External developments such as legislation, sector initiatives, and NGO recommendations.

3.2. Stakeholder engagement

We value stakeholder input and therefore regularly organize

- Dialogue sessions with suppliers, NGOs, trade unions, and Rightsholders;
- Consultations when drafting or revising policies.

This collaboration helps us to better understand risks and develop solutions that respect all parties involved.

3.3. Transparency and reporting

We communicate openly about our progress and challenges through our annual sustainability statement prepared in accordance with the CSRD. We also share best practices and lessons learned via sector initiatives such as the International Responsible Business Conduct Agreement for the Renewable Energy Sector, through our corporate channels, and via presentations to various stakeholders inside and outside our sector.

3.4. Our ambition

By continuously learning, collaborating, and being transparent, we aim to contribute to a responsible energy transition and a supply chain where human rights and environmental protection are central.

Glossary

Abbreviation	Full Term (EN)	Description (EN)
-	Acces to remedy	Access to remedy refers to the ability of affected individuals or groups to obtain appropriate and effective redress for adverse human rights or environmental impacts. This may include apologies, restitution, compensation, rehabilitation, guarantees of non-recurrence, or other forms of remediation, through judicial or non-judicial mechanisms.
-	Audit	An audit is a systematic and structured assessment of compliance with agreed standards, requirements and commitments related to human rights, environmental and governance topics. Within the context of due diligence, audits are applied on a risk-based basis to suppliers or other business relationships to identify actual or potential adverse impacts and determine appropriate follow-up actions, such as remediation or corrective action plans.
EU Taxonomy	EU Taxonomy regulation	European classification system defining which economic activities are considered sustainable, based on six environmental objectives and the “Do No Significant Harm” principle, including Minimum Safeguards.
CSDDD	Corporate Sustainability Due Diligence Directive	EU directive requiring companies to identify and address environmental and human rights risks in their value chains.
CSRD	Corporate Sustainability Reporting Directive	EU directive on sustainability reporting for companies.
CAP	Corrective Action Plan	Plan with actions, timelines and responsibilities to address identified supplier shortcomings.
DD	Due Diligence	Process of identifying, preventing, mitigating, monitoring, and remedying negative ESG impacts.
DMA	Double Materiality Analysis	Assessment covering both how the company affects people and the environment (impact materiality) and how sustainability factors affect the company’s financial performance (financial materiality).
ESG Audit procedure	ESG Audit procedure	Internal Stedin policy describing how social and environmental audits are conducted, including scope, methodology, frequency, and follow-up.



GM	Grievance Mechanism	Procedure enabling stakeholders to submit complaints about negative impacts.
GSPP	Raw Material Passport	Document detailing material composition and circularity data of a product, enabling transparency on recycled and bio-based content.
HREDD	Human Rights & Environmental Due Diligence	Process in which companies identify, prevent, mitigate, and remedy human rights and environmental risks in their value chain.
-	ILO Conventions	Legally binding international treaties by the International Labour Organization setting minimum standards for labour rights, including prohibition of child labour, forced labour, discrimination, and ensuring safe working conditions.
IRBC	International Responsible Business Conduct	Dutch policy framework for responsible business conduct based on OECD and UN guidelines.
OECD	Organisation for Economic Co-operation and Development	International organization setting guidelines for responsible business conduct, including due diligence requirements.
OECD Guidelines	OECD Guidelines for Multinational Enterprises	International standards for responsible business conduct, including due diligence requirements for human rights, environment, labour conditions, and transparency.
-	Recycled Material	Material that has been reprocessed from existing products or waste streams to reduce raw material consumption and minimize waste.
-	Remediation Measures	Actions taken to restore or address harm and eliminate adverse impacts.
-	Rightsholders	Individuals or groups with legally recognized rights potentially affected by business activities, such as employees or local communities.
-	Stakeholder	Groups or individuals affected by or influencing the company's operations.
-	Stakeholder Engagement	Active involvement of stakeholders through dialogue and consultation.
-	Value chain assessment	Assessment of risks in the supply chain, including category selection, raw material analysis and supplier prioritisation.



Tier 1 and 2	Tier 1 & Tier 2 Suppliers	Tier 1: Direct suppliers providing goods or services to Stedin. Tier 2: Sub-suppliers that deliver products or services to Tier 1 suppliers.
UDHR	Universal Declaration of Human Rights	International document adopted by the United Nations in 1948 that sets out fundamental human rights to be universally protected, regardless of origin, gender, religion or status.
