

Key activity summary

Workshop on Responsible Business Conduct (RBC) in the Rubber Sector for Migrant Workers in the (Lower) Supply Chain

25 September 2025, Rayong Province, Thailand

► Background & Objectives

Migrant workers are vital to Thailand's rubber sector, especially in plantations, initial processing and manufacturing. Despite their key role, many continue to face decent work challenges, limited social protection, and limited skills development opportunities. [The ILO-Japan Responsible and Inclusive Supply Chains for Migrant Workers in Thailand \(RISC-Migrant\)](#) project has been implemented to address these labour rights risks—particularly for Myanmar workers—by advancing decent work through 3 pillars: Social Protection, Skills Development, and Responsible Business Conduct (RBC).

The workshop on Responsible Business Conduct (RBC) in the rubber sector for migrant workers, held on 25 September 2025, aims to address RBC implementation gaps in labour rights protection and raise awareness on social protection and fair, legal recruitment of migrant workers.



© ILO / The event brought together over 100 participants from more than 30 rubber companies in Thailand — including both employers and trade unions — as well as ILO tripartite constituents.

► Core sessions

1. **Introduction** of RBC & basic labour rights for migrant workers
2. **Good practice sharing & groupwork activities** on RBC
 - Policy commitment
 - Human Rights Due Diligence (HRDD)
 - Grievance mechanism
 - Meaningful consultation
3. **Understanding** labour protection including fair & legal recruitment and social protection

► Summary of group work activities on RBC

Topics for discussion in brainstorming sessions conducted by all participants together at the workshop to share & exchange their experiences at their workplaces.



Topics for session 1: Policy commitment & HRDD

1. **Policy commitment:** Existence of RBC/human rights policies in the workplace & examples of policy types applied
2. **HRDD:** Realisation & practical implementation of HRDD in the workplace, including across supply chains & for all workers, including migrants.
3. **Challenges:** Faced in implementing RBC & HRDD
4. **Support needed:** Type of support needed from the government, employer groups, or businesses



Topics for session 2: Grievance & Meaningful consultation

1. **Grievance:** Existence & effectiveness of grievance mechanisms for all workers, including migrants
2. **Consultation:** Types of consultation practices that contribute to better labour/industrial relations
3. **Consultation:** How often the company meets with workers; main issues discussed during these meetings
4. **Solution:** Examples of issues jointly resolved by employers & workers through consultation & dialogue.

► Summary of group work activities on RBC (Cont.)

During these two sessions, participants shared their experiences and perspectives, including policies and practices within their companies and supply chain including:



Outcomes from session 1: Policy commitment & HRDD

1. **Widespread policy adoption:** Most enterprises have formal policies on RBC & human rights, including CSR policies, Thai Labour Standards certification, or alignment with international frameworks like the EUDR.
2. **Established HRDD practices:** There is an adherence to the core labour standards—for example, one group confirmed their implementation of “4 NOs” (no child labour, no forced labour, no trafficking, no discrimination).
3. **Varying awareness:** While many are aware of HRDD, understanding and practical application across supply chains vary, with most engagement limited to basic compliance.
4. **Implementation challenges:** Barriers include unclear guidelines, internal communication gaps, monitoring issues, AI support limitations, and legal complexities such as PDPA compliance.
5. **Supply chain visibility:** Limited knowledge of lower-tier suppliers, especially regarding workers, hampers effective HRDD, requiring management commitment & supplier cooperation.
6. **Need for knowledge & support:** Companies seek government-backed knowledge centres, programmes showcasing good practices, & budgets for raising awareness among lower-tier actors like rubber plantation groups.
7. **Regulatory clarity & incentives:** Firms request clear, long-term policies on legal migrant recruitment, simplified procedures, and financial support (subsidies, tax measures) to cover HRDD implementation & certification costs.



Outcomes from session 2: Grievance & Meaningful consultation

1. **Diverse grievance channels:** Enterprises provide a wide range of formal & informal grievance channels covering all workers, including migrants.
2. **Variety of mechanisms:** These include traditional tools like grievance/comment boxes and welfare committee meetings, as well as digital tools such as email, Google Forms, HR Lines, Line OA, & QR codes.
3. **Direct management access:** Many companies allow walk-ins, direct calls to top management, and face-to-face interactions like HR clinics on the production line.
4. **Formal & informal consultation:** Labour relations are supported by formal meetings (town halls, welfare committees, monthly departmental meetings) and informal approaches (morning talks, patrol walks, and relationship-building outside work).
5. **Focus on welfare:** Consultations, including those with workers' representatives or trade unions, focus on accommodations, wages, OSH, medical support & training.
6. **Format by company size:** It varies - large enterprises use welfare committees, dedicated call centres & other channels, medium enterprises may involve monthly consultation between trade unions & management, and SMEs often rely on management regularly visiting workers.
7. **Positive outcomes:** Grievance & consultation processes improve engagement, unity, respect, and worker welfare, while reducing conflicts, lowering turnover, and boosting productivity & loyalty.

► Key analysis

- **Policy adoption is foundational, but HRDD awareness is limited:** Enterprises generally have RBC & human rights policies and perform basic HRDD. However, awareness and implementation of full HRDD lack depth beyond basic compliance; the degree of understanding and practice varies across the supply chain.
- **Implementation gaps from lack of guidance & management commitment:** A key challenge is translating policy into practice due to the lack of clear, standardised guidelines and practical tools. Management commitment is essential, and internal hurdles—such as weak communication, monitoring, and overlapping legal issues (e.g., PDPA)—further impede effective implementation.
- **Supply chain visibility is a major challenge:** HRDD efforts rarely reach deeper supply chain tiers. Enterprises cite limited knowledge of lower-tier workers & lack of supplier cooperation as significant barriers.
- **Grievance & consultation mechanisms are effective:** Companies use diverse, accessible channels (QR codes, HR Lines, welfare committees) to address grievances and consultations for all workers, including migrants. Focused on welfare issues like wages, OSH, and training. These mechanisms improve engagement, unity, and reduce conflicts & turnover.
- **Government support is crucial:** Enterprises seek structured government support for capacity building (especially in lower-tier rubber plantations), regulatory clarity and simplified processes for legal migrant recruitment, and critical financial incentives (subsidies or tax support) for implementing recognized mechanisms like EUDR.

► Sharing of corporate good practices on RBC

In the workshop, **two rubber companies in Thailand** shared their good practices regarding the implementation of RBC

TATWIN



TAT WIN Co., Ltd., a Thailand-based natural rubber latex manufacturer, implements RBC through structured practices rooted in transparency, integrity, collaboration, and long-term sustainability.

Key practices include:

- **Strategic translation of standards:** TAT WIN aligns complex RBC standards—covering regulations, international guidelines, and customer requirements—with its business pillars to streamline processes. Certifications serve as tools to embed RBC & strengthen credibility.
- **Robust HRDD framework:** Following OECD Guidelines, due diligence extends across corporate operations and supply chains, supported by human rights and environmental policies, grievance and remediation mechanisms, and impact assessments.
- **Embedding RBC in policies:** RBC principles are built into core policies such as the RBC & Governance Policy, Human & Labour Rights Policy, Employer Pays Principle, and Responsible Sourcing Policy with a Supplier Code of Conduct.
- **Identifying and remediating risks:** The company prevents and addresses adverse impacts, e.g., reducing forced labour risks by enforcing the Employer Pays Principle, improving recruitment, and remediating passport fees through a structured grievance system.
- **Stakeholder engagement:** Continuous training and engagement involve farmers, employees, customers, and peers.

KIM GLOVES Co., Ltd., a manufacturer of rubber gloves in Thailand, implements RBC through practices ensuring worker voice, protection from retaliation, and institutionalized dialogue.

Key practices include:

- **Accessible grievance mechanisms:**
 - Multiple clear complaint channels—comment boxes, a dedicated email, and a Line company account—managed by assigned staff.
 - Channels & policies are available in Thai, Burmese, and Cambodian, with direct access to HR to ensure inclusivity.
- **Strong non-retaliation policy:**
 - A formal non-retaliation policy protects workers who raise concerns, widely communicated through multilingual announcement boards.
 - Guarantees include no blame or pressure in meetings, confidentiality of complainants, and protection from negative impacts on roles or career advancement.
- **Institutionalized worker representation:**
 - A welfare committee, including migrants (especially Burmese) worker representatives, meets with management quarterly.
 - This structured dialogue enhances mutual trust, strengthens employer–worker relations, and improves business credibility with trading partners.



Further examples of RBC good practices observed among rubber-related companies in the region are as follows:

- **Binh Long Rubber Co., Ltd (natural rubber & latex / Viet Nam):** The company provides stable jobs, fair wages, full insurance, and regular health checks, while investing in worker welfare such as holidays, and training for over 2,700 employees in five years. It also promotes inclusive hiring—employing 600 ethnic workers—and strengthens worker voice through union-led dialogues, workplace meetings, and collective labour agreements reflecting employee input.
- **Bridgestone Co., Ltd. (automotive tyres / Japan, global):** The company implements RBC through its Sustainable Natural Rubber Policy, promoting full supply-chain traceability, human rights protection, and environmental stewardship. The company supports smallholders through training, conducts supplier risk assessments, and collaborates globally to advance ethical and sustainable rubber sourcing.

► Practical recommendations – what actions the company can take today to boost RBC

- **Translate policies into practice (Policy commitment & HRDD):** Turn RBC & HRDD commitments into clear operational guidelines and tools for management and workers to ensure real implementation beyond compliance.
- **Extend supply chain due diligence (HRDD):** Establish specific monitoring & internal communication efforts to extend HRDD awareness & compliance requirements to all lower-tier suppliers (such as rubber plantation groups) to ensure that labour rights & risk assessments are applied comprehensively across the supply chain.
- **Make grievance systems accessible (Grievance mechanism):** Provide grievance channels in multiple languages as needed and strictly apply the non-retaliation policy to protect confidentiality and build trust.
- **Institutionalize worker dialogue (Meaningful consultation):** Formalize and consistently maintain structured, meaningful consultation practices to improve labour relations and worker welfare.

► **Practical recommendations – what actions the company can take today to engage migrant workers in the workplace regarding grievance & meaningful consultations**

During the workshop, participants agreed that **grievance mechanisms and meaningful consultations** are important starting points for enhancing (migrant) worker engagement and supporting RBC within enterprises.



Accessible channels for raising concerns

Various grievance-mechanism channels—for example:

- HR official emails
- Suggestion boxes
- Google forms
- LINE OA
- Hotline numbers
- Intranet grievance portal
- Third-party mechanisms

—are highly beneficial because it allows workers to choose the method that feels most accessible, comfortable, and safe for them. Different groups of workers, especially migrant workers, may prefer different communication styles or technologies.

Providing multiple options therefore helps ensure that no one is excluded due to factors like digital literacy or limited access to devices. Having diverse channels also facilitates smoother communication between workers and management. It increases the likelihood that issues are reported early, improves the accuracy of information received, and makes it easier for management to track, categorize, and respond to concerns. In turn, this fosters trust, transparency, and timely problem-solving within the workplace.



Breaking language barriers in workplace communication

Providing multilingual documents and communication approaches—such as translated policies, forms, hotlines, and digital platforms—ensures that workers, regardless of their nationalities, can access information and raise concerns in a language they fully understand.

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This is especially important for migrant workers who may face literacy or language barriers. Offering these options based on workers' needs greatly improves the accuracy and clarity of communication, enabling workers to articulate their issues more confidently and reducing the risk of misunderstandings.

For management, clear and multilingual channels help them identify the real issues occurring in the workplace, respond more effectively, and build trust with the workforce. Ultimately, these measures help reduce language barriers, promote meaningful dialogue, and strengthen a company's overall grievance and consultation processes.

Building inclusive workplace dialogue & consultation system

Having both formal and informal consultation platforms within the enterprise creates a more inclusive, accessible, and responsive communication environment for all workers, including migrant workers.

Informal options—such as direct conversations with supervisors or management—allow workers to raise issues comfortably and help identify problems early before they escalate. At the same time, formal mechanisms, such as welfare committees or joint consultation structures, offer structured and transparent opportunities for workers to participate in decision-making processes.

Importantly, enabling migrant workers to take part in these committees ensures their perspectives and needs are represented, leading to more accurate understanding of workplace issues and more inclusive solutions. Together, formal and informal consultations build trust, strengthen workplace relationships, and support responsible business conduct across the enterprise.



What makes a grievance mechanism effective?

Source: *ILO Better Work: A guidance note for promoting and strengthening effective grievance mechanisms in the garment sector*

When creating and strengthening your grievance mechanisms (or even consultation approaches), here are some key criteria to make them effective:

- Legitimacy
- Accessibility
- Predictability
- Transparency
- Equitability
- Rights compatibility
- Based on engagement and dialogue



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