**When filled in the form is to be kept secret in accordance with section 24 subsection 1 subparagraph 20 of the Act on the Openness of Government Activities (621/1999)**

**HUMAN RIGHTS ASSESSMENT FORM FOR PURPOSE OF EXPORT CONTROL AUTHORISATION FOR DUAL-USE ITEMS**

Under Article 15(1) of Regulation (EU) 2021/821 of the European Parliament and of the Council, in deciding whether or not to grant an authorisation or to prohibit a transit under this Regulation, the Member States shall take into account all relevant considerations, including considerations of national foreign and security policy, such as respect for human rights in the country of final destination.

The exporter shall comply with the legislation on dual-use items and provide the authority with information, in particular about the end-user, the country of destination and the end-use of the item exported. The exporter shall provide information on the grounds for its application and also in other respects contribute to the proper review of the matter it has instigated. This form contains questions relating to human rights which the Export Control Unit of the Department of Trade at the Ministry for Foreign Affairs puts to companies in the context of export control matters involving dual-use items. This form is not the sole means of review, however.

As the national competent authority responsible for the export control of dual-use items, the Export Control Unit at the Ministry for Foreign Affairs has the basis under Article 6(1)(c) of the General Data Protection Regulation of the EU to process personal data in its consideration of authorisations. The processing is necessary for compliance with the obligations under the Act on the Control of Exports of Dual-Use Goods. When filled in, the form may contain personal data. This shall be processed in accordance with data protection legislation. Information relating to the processing of personal data and data protection at the Ministry for Foreign Affairs is available at: <https://um.fi/dataprotection>

1. Human rights due diligence
2. Does your company engage in human rights due diligence? If yes, how have you identified and managed human rights issues (in respect of all parties to the transaction, including the consignee, end-user and buyer)?
3. Do you update your human rights due diligence process as necessary, for example when entering new markets?
4. If your company has an internal compliance programme (ICP) in place, have you incorporated human rights due diligence into this programme? If yes, please describe the findings of the assessment.
5. Other comments on your due diligence process.
6. Assessment of exported product/service
7. What is the intended use / end-use of the exported product or service? Please describe the end-use of the said export in more detail.
8. Is it possible that the exported product or service will be used for the purpose of human rights violations or that the product or service will have adverse human rights impacts, taking into account the end-user and end-use, the nature of the product or service, and the country of destination? Please note that taking into account their nature, many dual-use items subject to export control will have human rights impacts. Please describe the findings of your assessment.
9. Have you noticed that an equivalent product or service would have been used for the purpose of human rights violations or that an equivalent product or service would have had adverse human rights impacts? Please describe any adverse human rights impacts or human rights violations.
10. Other comments on the product/service exported.
11. Assessment of country of destination
12. Have you reviewed the internal security and human rights situations of the country of destination? If yes, please describe the findings of this review. Have you consulted with civil society representatives, representatives of local communities or human rights defenders active in the country? If yes, please describe the consultation process and the findings of your assessment.
13. Have you noticed any human rights violations/adverse human rights impacts in the country of destination and specifically in the region to which the items are to be exported? Please describe any adverse human rights impacts or human rights violations.
14. Other comments on country of destination.
15. Assessment of consignee/end-user
16. Does your company have an export history with the consignee/end-user?
17. Have you noticed anything to suggest that the activities of the consignee/end-user could be linked to human rights violations or that the activities of the consignee/end-user might have adverse human rights impacts (as things now stand or previously)?
18. Is there any risk that the consignee/end-user will use the item for an end-use other than the one notified?
19. Other comments on the consignee/end-user.
20. Other comments on the human rights assessment.