EPILOGUE II

Domestic Criminal Accountability for Dutch Corporations Profiting from North Korean Forced Labour

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Introduction

In this epilogue, I reflect on the potential for legal accountability of Dutch corporations profiting from the labour exploitation of North Korean workers abroad. The factual background of this legal question is well-known. In 2016, a team led by Remco Breuker,[1] professor of Korean Studies at Leiden University, issued a report detailing the appalling (forced) labour conditions in which North Koreans work.[2] In the EU, this happens in particular in Poland where they are forced to work on shipyards and have to hand most of their wages to the North Korean government. Apparently, North Korea 'traffics' these workers to Poland for self-enrichment purposes.[3] In the wake of this report, investigative work sponsored by The Why Foundation[4] exposed how various corporations and governments are complicit in these abuses, work that resulted in the documentary *Dollar Heroes*.[5] On that basis, Professor Breuker's research team produced a follow-up report, released on 6 February 2018, which

1) The research that resulted in this publication has been funded by the European Research Council under the Starting Grant Scheme (Proposal 336230—UNIJURIS) and the Dutch Organization for Scientific Research under the VIDI Scheme (No 016.135.322).

2) Remco E. Breuker and Imke B.L.H. van Gardingen, eds., *Slaves to the System, North Korean Forced Labour in the European Union: The Polish Case* (Leiden: LeidenAsiaCentre Press, 2016).

3) Ibid.

4) 'Why Slavery?' *The Why Foundation*, accessed 11 February 2018, http://thewhy.dk/whyslavery/.

5) The Why foundation, *Dollar Heroes*, documentary, directed by Sebastian Weis, Carl Gierstorfer, Jonghun Yu, Tristan Chytroschek and Wonjung Bae, produced by a&o buero filmproduktion (2018; Germany: ARTE).

highlighted the involvement of Dutch corporations, notably as buyers of ships made by North Koreans in Poland.

In this short contribution, I explain on what grounds these corporations could be held to account under Dutch criminal law, including how Dutch jurisdiction could be established over them. I focus in particular on the offence of profiting from human trafficking and labour exploitation. I argue that Dutch corporations profiting from overseas labour exploitation in their supply chain could indeed be held to account under Dutch law, at least from a legal-doctrinal point of view (Section 1). However, several practical and political constraints may render prosecutorial action addressing foreign human rights abuses rather unlikely (Section 2). As a result, other legal and political accountability mechanisms may have to be explored (Section 3). Section 4 concludes.

Legal options to hold profiting corporations to account to account under Dutch law

In order to hold Dutch corporations profiting from their involvement in exploitative labour practices abroad to account in the Netherlands, the Netherlands should obviously first have jurisdiction. Bearing in mind that the impugned production activities took place *abroad* (in Poland), and involved *foreign* (North Korean) nationals, jurisdiction may, at first glance, appear questionable. Can a Dutch prosecutor exercise jurisdiction over a situation with such a strong extraterritorial dimension? While not denying the extraterritorial elements of the situation, I submit that jurisdiction in this case can be established on the basis of the uncontested *territoriality* principle. This follows from a close reading of the relevant legal provisions in the EU Human Trafficking Directive[6] and Dutch implementing legislation in Article 273f of the Dutch Penal Code,[7] which makes punishable human trafficking and related exploitative labour practices.

The EU Human Trafficking Directive not only requires EU Member States to exercise their jurisdiction in case the offence of human trafficking is committed in whole or in part within their territory or in case the offender is one of their nationals.[8] Crucially, it also authorises – although does not mandate – Member States to exercise jurisdiction where an offence 'is committed for the benefit of a legal person established in its territory'.[9] The Dutch legislature rather faithfully gave effect to this provision in Article 273f(6) of the Dutch Penal Code, which criminalises 'profiting from the exploitation of a person' – although such profiting had earlier already been criminalised in the Netherlands in the context of pimping.

6) European Parliament and European Council, Directive 2011/36/EU OJ L 101, 'On preventing and combating trafficking in human beings and protecting its victims', 15 April 2011, https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:101:0001:0011:EN:PDF (accessed 1 March 2018).

7) Dutch Criminal Code, Article 273f, 'On Human Trafficking', 1 July 2009, https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/art_273_dutch_criminal_code_en_1.pdf (accessed 1 March 2018), *non-official translation*.

8) Directive of the Council and European Parliament 2011/36/EU of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA [2011] OJ L 101/1.

9) European Parliament and European Council, Directive 2011/36/EU OJ L 101.

According to the aforementioned provisions, it suffices that a person *profits* from labour exploitation. For jurisdictional purposes, it is immaterial *where* that exploitation occurred: it suffices that a domestically incorporated legal person somehow profits. It is the territorial *benefit* which a corporation draws from exploitative practices, regardless of location, that serves as the jurisdictional linchpin. Accordingly, Article 273f(6) of the Dutch Penal Code creates opportunities to trigger Dutch jurisdiction over corporations linked to acts of exploitation somewhere down the supply chain, and ultimately hold them liable.

If we apply this to the involvement of Dutch corporations in the exploitation of North Korean nationals on Polish shipyards, it does not actually matter that these persons are foreign nationals working abroad. What matters is that the products they make – the ships they build – are purchased by Dutch corporations, which go on to benefit or profit in the Netherlands from these practices. This act of benefiting or profiting is a territorial one, and triggers application of the territoriality principle, the basic principle of criminal jurisdiction. Its criminalisation somewhat resembles the criminalisation of territorial money laundering, receiving stolen goods, or participating in a criminal organisation, for which one can also be prosecuted in the Netherlands even if the predicate offence took place abroad. For instance, a Dutch NGO (SMX) recently filed a criminal complaint with a Dutch prosecutor against Rabobank, alleging that Rabobank laundered Mexican drug cartel money and participated in a criminal organisation together with these cartels, who allegedly committed crimes against humanity.[10]

To date, no Dutch prosecutions have been brought in labour exploitation cases with transnational aspects, but it may only be a matter of time. This has also been highlighted in an extensive study just published by Anne-Jetske Schaap.[11] In this study, she compares Article 273f of the Dutch Penal Code with the UK Modern Slavery Act[12] which does *not* provide for the kind of profit-based jurisdiction that would allow buyers to be held to account. She concludes that the Dutch Penal Code provides ample opportunities to hold corporations criminally liable for modern slavery, while finding it remarkable that legal practice does not reflect these opportunities.[13]

I have made a similar observation regarding the use of domestic criminal law, in particular Dutch criminal law, regarding extraterritorial human rights abuses more generally in a recent article in *Criminal Law Forum*.[14] I argue that existing provisions of the Dutch Penal Code may provide relatively unexplored options to hold corporations, or corporate officers for that matter, liable for their involvement in human rights abuses abroad. The *Association Internationale de Droit Penal* (AIDP), in whose work I participated, is currently

10) Prakken d'Oliviera Human Rights Lawyers, 'Aangifte tegen Rabobank Groep vanwege witwassen van winsten van Mexicaanse drugskartels', 2 February 2017, http://www.prakkendoliveira.nl/nl/nieuws/aangifte-tegen-rabobank-groep-vanwege-witwassen-van-winsten-van-mexicaanse-drugskartels/ (accessed 11 February 2018).

11) Anne-Jetske Schaap, *De strafrechtelijke aansprakelijkheid van ondernemingen voor moderne slavernij* (Nijmegen: Wolf Legal Publishers, 2017).

12) UK Modern Slavery Act 2015, http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted, (accessed 11 February 2018).

13) Schaap, *De strafrechtelijke aansprakelijkheid van ondernemingen voor moderne slavernij*, 152.

14) Cedric Ryngaert, 'Accountability for corporate human rights abuses: Lessons from the possible exercise of Dutch National Criminal Jurisdiction over multinational Corporations', *Criminal Law Forum* 29, no. 1 (2018).

also studying the issue. In its draft resolutions of June 2017,[15] the working group that studied jurisdictional issues concerning the prosecution of companies for violations of international human rights, signalled that states have a duty to protect and on that basis must 'ensure that their legal frameworks enable the investigation and prosecution of human rights abuses that occur in a company's business activity, in its supply or distribution chain, and in its other business arrangement that involve multiple legal entities'. These companies can only escape liability if they fulfil their due diligence obligations in respect of the human rights-sensitive circumstances in which goods are produced in their supply chain. It does not matter in this respect whether these corporations are only customers, and have not directly committed the abuses themselves.

What due diligence precisely means in a context of corporations profiting from labour exploitation in the supply chain has not yet been defined.[16] Accordingly, some international guidance from the OECD or the ILO may be useful.[17] In general, however, it can be stated that a corporation's liability will be engaged when it consciously accepted the risk that the goods it bought were produced in substandard conditions, including conditions of labour exploitation, even if the corporation did not intend such conditions to occur, and if the corporation did not have positive knowledge of the conditions.[18] Due diligence requires that corporations inquire in what circumstances these goods were produced, and they discontinue their business dealings after being informed of the exploitative practices. The report of Professor Breuker's team gives indications that some Dutch corporations were not always that diligent.

Practical and political constraints of prosecutions in respect of foreign labour exploitation

It is my self-evident hope that Dutch prosecutors thoroughly examine the involvement of Dutch corporations in the exploitation of North Koreans abroad. They may want to press charges in case of evidence that these corporations, in light of the information reasonably available to them, knowingly accepted the risk that the ships which they bought were produced in conditions of labour exploitation. There is no denying, however, that there are

15) Association Internationale de Droit Penal, 2017, 'Panel 4 - Prosecuting Companies for Violations of International Human Rights: Jurisdictional Issues, 'Draft Resolutions'', presented at *AIDP International Congress of Penal Law: Criminal Justice and Corporate Business*, University of Basel, 2-4 June 2017, http://www.penal.org/sites/default/files/files/XX_AIDP_DRAFT_RESOLUTIONS_circulate.pdf (accessed 11 February 2018).

16) The OECD has however published due diligence guidelines for multinational enterprises, e.g. regarding conflict-minerals supply chains. U.S Customs and Border Protection, Civil Enforcement Division Forced Labor Enforcement, *OECD Due Diligence Guidance*, #0656-1017, https://www.cbp.gov/sites/default/files/assets/documents/2017-Oct/OECD%20Due%20Diligence.pdf (accessed 11 February 2018).

17) Note that forced labour does have the ILO's attention. 'Publications on forced labour,' *International Labour Organization*, accessed 11 February 2018, http://www.ilo.org/global/topics/forced-labour/publications/lang--en/index.htm.

18) Compare Dutch Supreme Court, ECLI:NL:HR:2003:AF7938, NJ 2006, 328, 21 October 2003, https://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:HR:2003:AF7938; Dutch Supreme Court, ECLI:NL:HR:2015:3487, NJ 2016, 23, 8 December 2015, https://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:HR:2015:3487, (holding that a person's failure (omission) to exercise the diligence/care that can reasonably be expected to prevent criminal acts from occurring can be regarded as acceptance of these acts).

serious practical and political constraints to prosecutorial action of this kind, which render its exercise rather unlikely.

Firstly, Dutch corporations that may have benefited from exploitative practices might be important domestic economic players, and have sizeable political connections. Prosecutors, when exercising their discretion, may take the domestic economic consequences of decisions to investigate and prosecute into account, heed signals from their superiors or from their political overlords, or simply apply self-censorship. Also, prosecutors and the police have limited resources at their disposal and may have to set prosecutorial priorities, with *foreign* human rights abuses unlikely to top the list. Law enforcers' general lack of expertise in advanced transnational economic criminality obviously does not help.

Admittedly, these constraints can be overcome by increased investments in economic crime investigations. Such investments may politically be a hard sell, however, in case the returns on investment benefit a foreign rather than domestic constituency. Holding corporations liable for profiting from North Korean slave labour ultimately benefits, or is at least meant to benefit, North Korean labourers (or an amorphous international community, which may be shocked by those labourers' treatment). Corporate accountability does not, or at least does not directly increase Dutch national welfare. Certainly, the contribution to global security resulting from Dutch prosecutorial action could be foregrounded: arguably, holding customers to account may destroy the markets of the companies that exploit North Korean labourers, thereby depriving the North Korean regime of the income necessary to further develop its nuclear weapons programme. However, the causal contribution of Dutch prosecutorial action to the improvement of the Dutch/international security situation may be too tenuous to sustain a prosecution on national interest grounds.

What is left is that initiating a prosecution may simply be the right thing to do. Yet, taking action just because it is morally sound does not motivate (institutional) actors, especially not when the envisaged action is cosmopolitan in nature, i.e. when it serves the interests of non-nationals.[19] One may perhaps object that prosecutors have in the past exercised universal, 'cosmopolitan' jurisdiction over presumed perpetrators of international crimes. But also they have not acted in a purely altruistic fashion. Often, they have done so to bring justice to locally anchored victim (diaspora) communities, and thereby contribute to their integration.[20] Moreover, in most states, universal jurisdiction is, legally speaking, only triggered by the territorial presence of the presumed offender.[21] In the case of Dutch corporations allegedly profiting from North Korean slave labour, these conditions are not met. North Korean victims are hardly present in the Netherlands, and the proximate offenders – the company and its officials who actually exploit the labourers – are abroad.

19) I develop this point at length in Cedric Ryngaert, *Cosmopolitan Jurisdiction and the National Interest*, Oxford Handbook on Jurisdiction (Oxford: Oxford University Press, forthcoming 2018).

20) Frédéric Mégret, 'The 'elephant in the room' in debates about universal jurisdiction: diasporas, duties of hospitality, and the constitution of the political', *Transnational Legal Theory* 6, no. 1 (2015); Itamar Mann, 'The Dual Foundation of Universal Jurisdiction: Towards a Jurisprudence for the 'Court of Critique'', *Transnational Legal Theory* 1, no. 4 (2010), 485.

21) Dutch International Crimes Act, 'Containing rules concerning serious violations of international humanitarian Law', 19 June 2003, https://documents.law.yale.edu/sites/default/files/netherlands_-_international_crimes_act_english_.pdf (accessed 11 February 2018).

While the remote offender – the profiting corporation – may be in the Netherlands, its lack of proximity to 'the crime scene' may be considered as too small a factor to motivate institutional action. Certainly, individual prosecutors may possibly favour altruistic intervention,[22] but bias in favour of the status quo (which implies a tendency to refrain from prosecuting transnational human rights abuses) combined with conformity effects (which means adjusting to group attitudes or deferring to superiors) may drown out courageous voices.[23]

Non-criminal accountability mechanisms

Insofar as the criminal law may be an unlikely avenue to hold corporations to account for profiting from North Korean slave labour, other legal and political options may have to be explored. It exceeds the scope of this contribution to list and discuss these alternatives in-depth, but mention could be made of two mechanism: tort (civil) litigation initiated by victims and/or their representatives, and economic leverage exercised by activist institutional investors and trade facilitators.

Tort litigation has the advantage of bypassing prosecutorial discretion, in that victims could directly sue the presumed offenders before a domestic court. Under private international law, Dutch courts have uncontested civil jurisdiction over Dutch-registered corporations,[24] although obviously, it has to be established, just like in the criminal law, that the corporation violated its duty of care in respect of abuses committed in the supply-chain.[25] The question remains, however, whether, given the risks involved, a North Korean victim will be willing to step forward to bring the tort claim, and whether (s)he can count on the support of a non-governmental organisation and/or a law-firm offering its services *pro bono*.

As far as economic leverage is concerned, it bears emphasis that corporations profiting from North Korean slave labour may theoretically be subject to market pressures, in particular from ethically motivated consumers, investors, and state agencies. Such market pressures can serve as 'private' accountability tools to the extent that these corporations have no other choice than to change their dealings if they are not to lose market share and investment opportunities. The success of this accountability strategy hinges, however, on the intensity of the exerted pressure and the recognisability of major consumer brands.[26]

22) Anne van Aaken, 'Behavioural International Law and Economics', *Harvard International Law Journal* 55, no. 2 (2014), 421- 443 (discussing conditional altruism).

23) See the insights of behavioural economics, as lately applied to (international) law, e.g., Tomer Broude, 'Behavioural International Law', *University of Pennsylvania Law Review* 163 (2015), 1099-1147 (discussing small decision making groups and conformity effects in international tribunals).

24) The domicile principle is the pre-eminent principle of jurisdiction in private international law. European Parliament and European Council, Regulation (EU) 1215/2012 OJ L351/1, 'On jurisdiction and the recognition and enforcement of judgments in civil and commercial matters (recast)', 12 December 2012, Cf. Article 4, https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32012R1215 (accessed 1 March 2018).

25) See for an extensive discussion: Liesbeth Enneking et al., *Zorgplichten van Nederlandse Ondernemingen inzake Internationaal Maatschappelijk Verantwoord Ondernemen. Een rechtsvergelijkend en empirisch onderzoek naar de stand van het Nederlandse recht in het licht van de UN Guiding Principles*, Utrecht Centre for Accountability and Liability Law (The Hague: Boom Juridisch, 2016).

26) See on consumer pressure with respect to the realisation of international values: Anne van Aaken, 'Markets as

As the relevant Dutch corporations are themselves the end-consumers of ships built on Polish shipyards, large-scale civil society-organised citizen-consumer pressure is unlikely to take place. Still, economic partners, such as ethically-minded financiers, insurers, and investors, e.g., pension funds,[27] or other private or public entities contracting with, subsidising or otherwise facilitating these corporations, may want to withhold funding, investment, or contracts from these corporations if the latter do not bring profiting from North Korean labour exploitation to a halt. As the UN Guiding Principles on Business and Human Rights (2011) remind us, if such partners are states or state agencies, they may even have an international duty to do so.[28]

Concluding observations

Legally speaking, Dutch corporations profiting from the exploitation of North Korean labourers abroad can be held to account under Dutch criminal law, at least if it can be established that they failed to exercise due diligence regarding the risk of human rights abuses in their supply chain. No Dutch prosecutions, let alone convictions for profiting in a transnational context have been reported, however. While legally largely irrelevant, the causal and geographical remoteness of Dutch corporations' profiting from overseas labour exploitation, as well as the absence of a clear national interest at stake, are unlikely to spur prosecutors into action. Understaffing and lack of resources may not help either. This is unfortunate: the criminal law can send a strong accountability signal, as it expresses the community's strong moral condemnation of the exploitative practices that the report describes. The criminal law is, however, not the only mechanism available to hold remotely profiting corporations to account and to effect behavioural change. This contribution has suggested tort litigation and especially market pressure exerted by economic partners as potential alternative avenues.

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27) See 'Responsible Investments', *Norwegian Government Pension Fund*, accessed 11 February 2018, https://www.regjeringen.no/en/topics/the-economy/the-government-pension-fund/responsible-investments/id446948/.

28) OHCHR, *UN Guiding Principles of Business and Human Rights* (New York and Geneva: OHCHR, 2011), http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf (accessed 11 February 2018). States have an international obligation to protect private persons from human rights abuses committed by other private persons. They can discharge this obligation by ending economic support to corporations involved in human rights abuses. See Principle 1 UNGP.

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