

Risk & Resilience Quarterly

Insight on human rights & sustainability strategy

October 2025

Step toe

*World-class legal advice at the intersection
of business, regulation, policy, and the courts*

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Welcome to Risk & Resilience Quarterly, which brings together practical insight on complex sustainability and human rights challenges. This inaugural issue highlights pieces on business and human rights in the Trump administration, designing supply-chain grievance mechanisms, trade policy and human rights, and navigating antitrust in sustainability initiatives. We are also delighted to announce the launch of Steptoe Pilot, an initiative designed to bring companies together to design, test, and refine practical approaches to the most salient and challenging human rights risks.

Sign up using this [subscription link](#) and get real-time updates from our *Risk & Resilience* team and join the conversation on [LinkedIn](#).

Featured Initiative

Steptoe Pilot

Over the last few months, we have been engaging with an array of clients and stakeholders to explore how Steptoe can best support companies wrestling with issues at the vanguard of corporate responsibility. We are now thrilled to announce the launch of Steptoe Pilot, a collaborative initiative to design, test, and refine practical approaches to the most salient and systemic business and human rights risks. Our initial projects focus on business in conflict zones, redress for systemic harms, and supply chain grievance mechanisms. Please reach out to any of us if you would like to participate or learn more.

[Read more](#)

Legislative Update

EU anti-deforestation rules likely to be delayed until December 31, 2026

The European Commission announced on September 23, 2025 that it will propose postponing the application of EU Deforestation Regulation (EUDR) requirements for another 12 months, citing IT system capacity issues. If the European Parliament and the Council approve the Commission's proposal, this will be the second time in a year that the application of EUDR requirements has been delayed. The EUDR, which was originally set to apply from December 30, 2024, was delayed last year until December 30, 2025 to give companies more time to prepare for the new requirements.

The EUDR could be subject to further legislative changes via the Environmental Omnibus Package, which is expected in Q4 2025. Our team in Brussels is tracking the political developments closely and would be happy to discuss any questions.



Recent Publications

Business and Human Rights in the Trump Administration

Federal policy changes in the last few months have left businesses with growing uncertainty and unclear direction on how to navigate human rights and sustainability (BHRS) issues. This piece, published by the Corporate Board, provides companies and their boards with a holistic perspective on what can be gleaned from federal policy, state and local policy, and litigation risk as they relate to BHRS. The piece ends with key questions for corporate boards and senior leadership to consider as they approach BHRS issues.

[Read more](#)

Sustainability, Collaboration, and EU Competition Law

The European Commission recently issued two informal guidance letters and one opinion regarding joint initiatives among competitors. Taken together, these three cases show that EU competition law can permit joint action where the goals fit EU policy priorities: sustainability and support for the agricultural sector.

[Read more](#)

Launching a CS3D-Aligned Complaints Mechanism: Lessons from a Pilot

Grievance mechanism expectations under the **EU Corporate Sustainability Due Diligence Directive** (CS3D) are groundbreaking. The practical challenge created by the CS3D's union of due process and scale is substantial. Over the last two years, our team led a pilot to understand how best to launch CS3D-aligned grievance mechanisms across global supply chains. This piece draws out some of the practical lessons we learned and suggests paths forward.

[Read more](#)

The Increased U.S. Trafficking Risks for Business

U.S. authorities continue to intensify scrutiny of supply chains and connections to transnational criminal organizations and cartels. This article outlines the human trafficking problem in the U.S and provides an overview of the legal—litigation and regulatory—response. It outlines the implications for domestic and multinational companies and provides three actions for companies to consider to enhance resilience to forced labor and human trafficking risks.

[Read more](#)

Trade, Supply Chain Dynamics, and Human Rights

Despite recent signs of relief, unpredictable and rapidly shifting US trade policy has sowed uncertainty into global supply chains. Companies are considering a panoply of measures to reorient supply chains. Those measures, however, may carry human rights risks that are serious for stakeholders and potentially for companies. This piece highlights key trade-related human rights and their implications for corporate strategy and governance.

[Read more](#)

Navigating Forced Labor Trade Regulation

Forced labor is one of the most prevalent and severe human rights risks in global supply chains. It is also an increasing regulatory and litigation risk for business. The most complex arena for companies to navigate is arguably trade regulation. This piece compares the scope, enforcement, and practical implications of Section 307 of the US Tariff Act; the Uyghur Forced Labor Prevention Act; and the EU Forced Labour Regulation.

[Read more](#)

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