

SPECIFIC INSTANCE

“Cheddite France”

15 July 2026

Initial Assessment Statement from the French National Contact Point

Following its initial assessment, the NCP offers its good offices to Cheddite France and the complainant.

On 28 July 2025, the French National Contact Point (NCP) for Responsible Business Conduct received a specific instance concerning Cheddite France from a complainant who wishes to remain anonymous and is represented by counsel, Ms Elise Le Gall. The referral concerns Cheddite France’s due diligence regarding the alleged use, as reported by the complainant, of some of the company’s products (shotgun cartridges) in the context of demonstrations in Iran.

1. Procedure followed by the NCP

The complainant’s counsel submitted the specific instance to the NCP on 28 July 2025. The NCP Secretariat acknowledged receipt on 3 September 2025 and forwarded it to NCP members on 5 September 2025. The NCP confirmed the formal admissibility of the referral on 17 October 2025 and informed Cheddite France of the referral on 28 November 2025.

The NCP then held hearings with the parties: the complainant and his counsel on 11 February 2026, and the company on 4 March 2026. On 27 March 2026, the NCP instructed its Secretariat to prepare the initial assessment statement. The NCP adopted a draft initial assessment statement on 23 June 2026 and then consulted the parties for comments. The NCP adopted this statement on 15 July 2026 and published it on its website. It notified the specific instance to the OECD Centre for Responsible Business Conduct for inclusion in the database of NCP specific instances.

2. Presentation of the referral

2.1 Presentation of the complainant

The referral was submitted by a complainant who wishes to remain anonymous for security reasons, Mr X, an Iranian national with refugee status in France. His identity is known to the NCP.

The complainant is represented by counsel, Ms Elise Le Gall, in this specific instance.

2.2 Background to the referral and summary of the alleged facts

Cheddite France, the company concerned by the referral, is established in France and specialises in manufacturing components for hunting and sport-shooting cartridges. According to the information provided to the NCP, it manufactures cartridge cases (the body of the cartridge), and primers (used for

ignition)¹. These products may be marketed separately or pre-assembled before being sold mainly to professional ammunition manufacturers.

The referral arises in the context of the demonstrations that began in Iran in September 2022 following the death of student Mahsa Amini. The complainant states that the Iranian security forces allegedly used shotgun cartridges, among other means, to suppress these demonstrations.

The complainant relies in particular on open-source material and a press investigation alleging that shotgun cartridge cases bearing markings associated with the Cheddite brand were found in Iran. According to the complainant, this material raises questions about product traceability, end-use controls and Cheddite's due diligence in relation to diversion risks.

2.3 Allegations concerning non-observance of the Guidelines

The complainant relies mainly on the recommendations of the Guidelines concerning general policies and human rights. He considers that Cheddite France may have failed to exercise due diligence, in particular because of the alleged inadequacy of measures to prevent risks, trace products and control their end use.

The referral concerns in particular:

- Chapter II on General Policies, in particular the recommendations concerning respect for human rights and the exercise of risk-based due diligence;
- Chapter IV on Human Rights, in particular the provisions concerning (i) the prevention, mitigation and remediation of actual or potential adverse human rights impacts; (ii) the preparation and public disclosure of a policy commitment to respect human rights; and (iii) mechanisms to monitor risks associated with business relationships, products and their end use.

The complainant requests the good offices of the French NCP to initiate a dialogue with Cheddite France in order to contribute to resolving the issues raised in this specific instance.

2.4 Response of the company

Cheddite France disputes the complainant's allegations. The company states that it has never sold products for export to Iran and considers that none of the material in the case file establishes a definite link between its activities and the alleged facts or demonstrates that its products were used by the Iranian security forces.

The company states that it complies with all statutory and regulatory requirements applicable to the export of its products. It indicates that its exports are subject to strict authorisation and control procedures and that it has internal responsible business conduct policies and procedures, including a CSR report, a code of conduct and an ethics charter.

Lastly, the company informed the NCP that criminal proceedings brought by the same complainant concerning the same facts are currently under judicial investigation. It considers that continuing the NCP procedure would risk interfering with those judicial proceedings, in particular as regards the

¹See Annex.

confidentiality of the investigation, the conduct of investigative measures, defence rights and the authority of the criminal justice system. It further submits that the NCP procedure does not provide the same procedural safeguards as judicial proceedings, while the same facts are already the subject of a judicial investigation.

3. Coordination with foreign NCPs

The French NCP contacted the Italian NCP because the referral mentions Cheddite Italy, a company established in Italy and belonging to the same group. However, since the specific instance concerns Cheddite France, a company based in Bourg-lès-Valence (Drôme), the French NCP considers that it has primary responsibility for conducting the initial assessment and handling the specific instance. If necessary, it may continue its exchanges with the Italian NCP during the procedure, in accordance with the OECD Procedural Guidance and its Rules of Procedure.

4. Summary of the initial assessment of the specific instance (Articles 16, 22, 23 and 25)

Under its Rules of Procedure, the NCP assesses the admissibility of a referral in two stages. First, it verifies the formal admissibility criteria (Article 16). The referral must specify the identity of the enterprise concerned; the identity and contact details of the complainant; details of the facts alleged against the enterprise; and the provisions of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct on the basis of which the NCP for RBC is seized. The NCP then conducts the initial assessment by addressing the questions set out in Articles 22, 23 and 25 of its Rules of Procedure. These questions are:

- Is the complainant acting in good faith and does he have an interest in the matter? (Articles 22 and 23);
- Is the referral related to the Guidelines? (Article 22);
- Are the issues raised significant? (Article 23);
- Is there an apparent connection between the enterprise's activities and the issues raised? (Article 23);
- What laws and procedures are applicable, and what is the effect of ongoing parallel proceedings? (Articles 23 and 25);
- Can the NCP make a positive contribution to resolving the issues? (Article 25);

◆ Formal admissibility

The referral identifies the enterprise concerned, the complainant, the alleged facts and the recommendations of the Guidelines relied upon. The complainant, Mr X, did not wish to disclose his identity to Cheddite's representatives. His identity is, however, known to the NCP. On the basis of the information available to it, the NCP considers that the criteria of Article 16 are met.

◆ Response to the initial assessment questions

a. The complainant's good faith and interest in the matter

The complainant was a direct victim of the suppression of the demonstrations in Iran. He states that he is acting in the interests of Iranian victims and, to that end, seeks greater transparency concerning the circulation of products that may have been diverted from civilian use in Iran. He told the NCP that he was not seeking to substitute the NCP procedure for the ongoing judicial proceedings.

Cheddite France argues that the good-faith criterion is not met. The company considers that the sequence of the complainant's actions, including the commencement of criminal proceedings concerning the same facts before the referral to the NCP, raises questions about the purpose of the referral. The NCP notes that the existence and timing of parallel proceedings are not, in themselves, sufficient to establish a lack of good faith.

On the basis of the information available to it, the NCP considers that the complainant is acting in good faith and has an interest in the matter.

b. Connection with the Guidelines

The referral alleges that Cheddite France has not observed the recommendations of the Guidelines concerning risk-based due diligence and human rights. It raises issues relating to the prevention and mitigation of potential adverse impacts linked to the enterprise's products and business relationships.

The NCP considers that the referral is related to the Guidelines.

The NCP nevertheless recalls that its examination is not confined to the chapters or recommendations relied upon by the complainant. It may focus its analysis on the recommendations that appear relevant to making a positive contribution to resolving the issues raised. In this specific instance, the NCP will examine questions relating to Cheddite France's due diligence, without prejudging the legal characterisation of the alleged facts or assessing the alleged human rights violations, which fall within the scope of the ongoing criminal proceedings.

c. Significance of the issue and supporting material provided

The issues raised by the referral concern the alleged use of hunting products or components in the suppression of demonstrations, and the due diligence, traceability and control systems associated with marketing those products and components. Without expressing a view on whether the alleged facts occurred or on Cheddite France's involvement, the NCP considers that the issues raised by the referral are significant and merit further examination.

d. Apparent connection between the enterprise's activities and the issue raised in the specific instance

Cheddite France manufactures and markets components for hunting and sport-shooting cartridges. The referral concerns the alleged use of cartridge cases bearing the Cheddite brand in the context of the 2022 demonstrations in Iran.

The company disputes any connection between its activities and the alleged facts. It states that it has never sold products for export to Iran. It also submits that the material provided by the complainant does not make it possible to identify with certainty any products manufactured by Cheddite France or to establish their origin, commercial distribution chain or any diversion of its products.

At the initial assessment stage, the NCP is not in a position to establish the exact origin of the products concerned, their export route or whether any diversion occurred. It nevertheless considers that, subject to the alleged facts being established, the material provided discloses a sufficient apparent connection between the enterprise's activities and the issues raised to warrant further examination.

e. Relevance of applicable laws and procedures and the effect of ongoing parallel proceedings

The NCP takes into account the national and European legal frameworks applicable to the products concerned, in particular the national export regime for certain products provided for in Chapter VI of Book III of the Internal Security Code² and Council Regulation (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran³. The NCP notes that the company states that it complies with all applicable statutory and regulatory requirements.

The NCP recalls that the Guidelines are recommendations addressed to multinational enterprises. Their implementation may require consideration of issues that go beyond mere compliance with applicable legal requirements.

The NCP notes that the same complainant has brought criminal proceedings in France. Those proceedings concern alleged criminal offences that fall outside the NCP's remit. The NCP's role is not to establish whether an offence has been committed, determine any person's guilt or assess the existence of a causal link under criminal law.

The NCP considers, however, that the existence of these parallel proceedings does not in itself prevent the NCP procedure from continuing. The two procedures pursue different objectives: the judicial proceedings seek, where appropriate, to establish liability under domestic law, whereas the NCP procedure is a non-judicial mechanism based on the OECD Guidelines, intended to examine the enterprise's responsible business conduct and, through good offices, to facilitate a negotiated solution. The NCP will take care to prevent any risk of interference with the judicial proceedings, particularly as regards the confidentiality of the investigation, the adversarial principle, defence rights and the presumption of innocence.

To that end, the NCP will focus its good offices on Cheddite France's due diligence, risk-management procedures, product traceability, customer relationships and end-use control systems, without addressing questions of criminal classification or expressing a view on the alleged human rights violations before the criminal court.

f. Article 25: Can the NCP contribute to resolving the issues?

The NCP considers that its good offices may make a positive contribution to resolving the issues raised. The procedure provides a forum for dialogue between the parties that is distinct from judicial proceedings.

² French Internal Security Code, Book III, Chapter VI (available via this link: Chapter VI: Acquisition, possession and transfers within the European Union, imports and exports (Articles R316-1A to R316-56) – Légifrance)

³ COUNCIL REGULATION (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran and repealing Regulation (EU) No 961/2010

In particular, the good offices could enable the parties to discuss Cheddite France's due diligence systems (risk mapping, traceability measures, end-use clauses and procedures governing business relationships).

The NCP therefore considers that it can make a positive contribution to handling the specific instance.

5. Conclusion of the initial assessment (Article 18)

Pursuant to Article 18 of its Rules of Procedure, the NCP considers that the issues raised by the referral concerning the effectiveness of the Guidelines merit further examination and that it can contribute to helping the parties resolve their differences. The NCP has decided to offer its good offices to the parties and remains available to discuss the feasibility and scope of mediation.

The NCP procedure is confidential. In accordance with its Rules of Procedure and the OECD Procedural Guidance, and in order to build trust with the parties, the NCP will take appropriate measures to protect sensitive business and other information and the interests of other stakeholders involved in this specific instance.

The NCP recalls that acceptance of the referral does not determine whether or not the enterprise acted consistently with the OECD Guidelines.

Annexes:

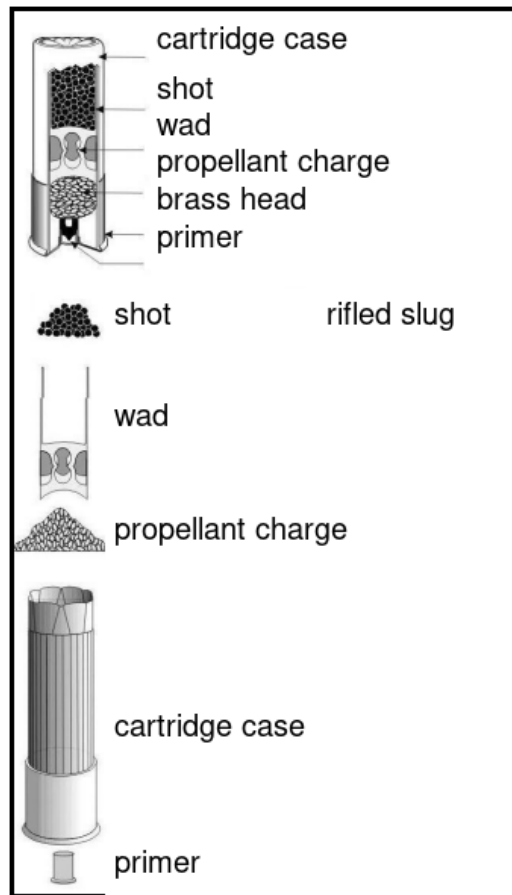
- Diagram of shotgun cartridge components. Source: RCMP/CFP, Canadian Firearms Safety Course, Student Handbook, 5th ed., 2014, fig. 31, p. 84.
- Diagram of the procedure for handling a specific instance
- Excerpts from the Rules of Procedure of the French NCP on the initial assessment of a referral (Articles 16, 18, 19, 20, 22, 23, 24, 25, 26 and 31) and the confidentiality of the procedure (Articles 38, 39 and 40).

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Diagram of shotgun cartridge components



Source: RCMP/CFP, Canadian Firearms Safety Course, Student Handbook, 5th ed., 2014, fig. 31, p. 84.



Excerpts from the Rules of Procedure of the French NCP

IV – REFERRALS TO THE NCP FOR RBC – INITIAL ASSESSMENT

- **Article 16.** A referral to the NCP for RBC must be precise. In this regard, it must stipulate: the identity of the enterprise in question; the identity and contact details of the complainant; details of the facts of which the enterprise is accused; and the provisions of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct in respect of which the referral to the NCP for RBC is being made.
- **Article 18.** In examining the admissibility of a referral, the NCP for RBC shall begin by analysing the formal admissibility provided for by Article 16 and then carry out the initial assessment in order to assess the importance of the issues raised to ascertain whether they merit further examination as provided for in Articles 22, 23 and 25. The NCP for RBC shall contact the parties and may ask them for further information so as to finalise its initial assessment.
- **Article 19.** Following its initial assessment, the NCP for RBC conveys its response to the parties involved. The NCP for RBC shall issue a statement announcing the admissibility of the specific instance, which shall stipulate the identity of the parties, the country or countries concerned by the referral and a summary of its initial assessment. With due regard to the confidentiality incumbent on the NCP for RBC, the complainant may inform its principal(s) of the decision taken by the NCP for RBC with regard to admissibility.
- **Article 26.** The NCP for RBC shall endeavour to conclude an initial assessment within three months of acknowledging receipt of the referral, although additional time may be granted, if need be, in order to collect essential information necessary for an informed decision.
- **Article 31.** The NCP for RBC shall strive to examine the issues raised within the best timeframe, if possible within 12 months of receipt of a specific instance, it being understood that this timeframe may be extended if circumstances so warrant, for example if the issue raised involves a country that has not adhered to the Guidelines, or in the event of parallel procedures.

V – EXAMINATION OF SPECIFIC INSTANCES

- **Article 27:** Where the issues raised merit further examination, the NCP for RBC shall offer its good offices to help the parties involved resolve them by providing a forum for dialogue. During its good offices and the examination of the specific instance, the NCP for RBC shall consult with these parties and, where appropriate according to the case examined, shall:
 - Seek advice from competent authorities and/or representatives of the business community, worker organisations, other non-governmental organisations and experts. Any expert, regardless of which party requested the expert's involvement, must be directly connected with the subject matter of the specific instance and approved by the NCP for RBC, which assesses the relevance and conditions of any involvement in the procedure.
 - Consult, where appropriate, the NCP for RBC of the other country or countries concerned, including on draft statements where the foreign NCP for RBC is mentioned;
 - Seek the opinion of the OECD Investment Committee if it has doubts about the interpretation of the Guidelines in the particular circumstances;
 - Propose, and with the agreement of the parties involved, facilitate access to consensual and non-adversarial means, such as conciliation or mediation, to assist the parties in resolving the issues.
- **Article 28:**
 1. The examination of a specific instance shall take the form of a series of consultations between the enterprise involved, the party or parties having made the referral to the NCP for RBC and all NCP for RBC members. These consultations shall enable the referring party or parties to set forth the grounds for the referral in detail and allow the enterprise concerned to respond. The NCP for RBC's good offices may take the form of regular exchanges between the NCP for RBC and the parties (meetings, hearings, telephone conversations, videoconferences, letters/emails). Subject to respecting the confidentiality which applies to the procedure, the NCP for RBC Secretariat manages the exchange of information



between the complainant and the enterprise, on the one hand, and between the parties and the NCP for RBC, on the other. From the start of its good offices, the NCP for RBC may suggest that the parties meet and may reiterate this proposal during the procedure. It may also offer mediation or conciliation, which it may conduct directly. The NCP for RBC shall keep the parties regularly informed of the progress of its discussions and may ask them questions.

2. In order to ensure fairness between the parties and the transparency of the NCP for RBC's action, the NCP for RBC Secretariat informs each party of the procedural decisions taken by the other party concerning the acceptance, refusal and, where appropriate, withdrawal of the good offices during the procedure.

Confidentiality

- **Article 38:** *In compliance with the provisions of Article 40, NCP for RBC members' involvement in examining a specific instance carries with it their commitment to respect the confidentiality of the discussions, interviews and documents exchanged. NCP for RBC members are bound to respect the confidentiality of a referral while its examination is not closed. When required for the handling of a specific instance, certain documents may be provided at meetings to NCP for RBC members, who shall formally acknowledge receipt thereof.*
- **Article 39:** *In order to facilitate resolution of the issues raised, the NCP for RBC shall take appropriate measures to protect sensitive business and other information and the interests of other stakeholders involved in the specific instance.*

Article 40: *When closing the procedures, if the parties involved have not agreed on the resolution of the issues raised, they shall be free to communicate about and discuss these issues. However, information and opinions provided during the procedures by another party involved shall remain confidential for the parties and for NCP for RBC members, unless that other party agrees to their disclosure or this would be contrary to the provisions of national law.*

Transparency, impartiality and prevention of potential conflicts of interest

- **Article 41:** *Impartiality is one of the criteria for handling specific instances set by the Procedural Guidance of the Guidelines (refer to Article 2). A member concerned or any other NCP for RBC member shall report, on a case-by-case basis, any perceived or actual conflict of interest which may lead to a lack of impartiality that could affect the handling of the specific instance. The member concerned shall assess whether his or her presence is likely to be detrimental to the impartial handling of the specific instance or whether he or she should stand down. Should the NCP for RBC Chair see fit, the Chair may arrange for a discussion of cases of perceived conflicts of interest.*