



Executive Summary

Human Rights Assessment of the AI Data Supply Chain

AI depends on a global workforce that trains and evaluates AI models. Yet much of this work remains obscured within complex vendor, subcontracting, and platform-based arrangements, leaving significant gaps in companies' human rights due diligence, responsible sourcing, and AI governance.

The AI data supply chain is evolving rapidly. While some tasks are becoming increasingly automated, demand is growing for more specialized human expertise in areas such as model evaluation, testing, and fine-tuning. These shifts create new opportunities but also introduce new labor rights risks and amplify existing challenges. Companies developing and deploying AI must recognize their role in shaping working conditions across the supply chain and adapt their responsible sourcing practices accordingly.

Conducted by BSR in collaboration with leading technology companies, this Human Rights Assessment uncovers key labor and human rights risks across the AI data supply chain and outlines concrete actions companies can take—individually and collectively—to strengthen governance and responsible sourcing practices.

Key Actions

Recommendations, which are broadly directed towards direct buyers of AI data services, are organized into four strategic priority areas:

- 1. Establish Visibility:** Companies can map their AI data supply chains, including vendors, subcontractors, workforce models, and worker geographies. Greater transparency is necessary to identify risks, conduct due diligence, and strengthen accountability.
- 2. Apply Existing Responsible Sourcing Practices:** Companies can extend existing supplier due diligence processes to AI data work. Responsible sourcing programs are often not applied consistently to AI-related labor despite comparable labor rights risks.
- 3. Address Salient Labor Rights Risks:** Companies can strengthen protections around occupational health and safety for workers handling sensitive or harmful content, fair compensation, grievance mechanisms, and contracting practices.
- 4. Address Structural Drivers:** Companies should review commercial requirements and purchasing practices that can drive adverse labor conditions, including pricing, productivity targets, turnaround times, demand volatility, and subcontracting expectations. They should also strengthen oversight of platform-based work and pursue collective action with buyers, suppliers, and other stakeholders to align incentives, raise labor standards, and improve worker access to remedy.

Looking Ahead

The future of responsible AI hinges not only on how companies govern AI models, but also on how they protect the workers behind them. Companies that proactively address labor rights risks across the AI data supply chain will be better equipped to navigate evolving regulatory expectations, mitigate operational risks, and build lasting trust in AI systems. Tackling systemic labor challenges will also require collective action, with industry collaboration playing a critical role in driving meaningful improvements for workers across the AI value chain.