Investor Statement Calling on Companies to Improve Performance on the Corporate Human Rights Benchmark

Dear Board of Directors,

The undersigned 191 investors representing over US$4.6 trillion in assets under management are writing to express our concern regarding companies’ results in the Corporate Human Rights Benchmark (CHRB).¹

The Investor Alliance for Human Rights is a collective action platform for responsible investment. Its members include asset management firms, public pension funds, trade union funds, faith-based institutions, family funds, and endowments. Collectively, they represent more than US$5 trillion in assets under management in 18 countries.

As investors,² we expect companies to demonstrate their respect for human rights across their operations and value chains, including through (1) the disclosure of strong public commitments on human rights, (2) explanations of rigorous human rights due diligence processes, and (3) transparent mechanisms that enable remediation of negative impacts. We believe these actions can ameliorate risks to business, including operational delays, reputational harm, financial loss, and legal liabilities.³

Human rights due diligence is a key element in corporate respect for human rights, as detailed in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct. In addition to the CHRB, numerous publicly available resources provide guidance to help companies fulfill the due diligence expectations laid out by these frameworks.⁴

Yet, based on the latest CHRB ranking, which assessed the largest publicly traded companies in high-risk sectors against five human rights due diligence indicators, a significant number of companies have scored poorly, many scoring zero on all five indicators. We are concerned that a lack of public communication on human rights suggests these companies have not assessed associated risks or determined how best to mitigate them.

¹ The CHRB is part of the World Benchmarking Alliance and ranks the largest publicly traded companies in the world on a set of human rights indicators with the goal of improving corporate human rights performance.
² The OECD guidance on Responsible Business Conduct for Institutional Investors calls on institutional investors to identify, assess, and address human rights risks connected with their investment activities.
We are therefore calling on companies to demonstrate respect for human rights by publicly disclosing the following:

1. Your processes to identify and assess adverse human rights risks and impacts in your operations and throughout your business relationships, including throughout your supply chain;
2. Your processes for prioritizing your salient human rights issues, meaning the most severe impacts on people connected to your business;
3. Your salient human rights impacts, including impacts in the supply chain;
4. Your actions to prevent, mitigate, and remediate adverse impacts in relation to your salient human rights issues, and how these actions apply across your value chain; and
5. Your approach to tracking the actions taken, how those actions are evaluated and revised for effectiveness, and the effectiveness of your approaches in addressing those adverse impacts.

A company’s public communication on these factors will impact its score on the CHRB ranking, and more importantly provides the undersigned with insight into how a company is meaningfully working to fulfill its responsibility to respect human rights.

We encourage all companies to report on the requested disclosures and to be an industry leader in the area of human rights due diligence. We look forward to your response, and learning more about your approach to human rights in the forthcoming assessment.

Sincerely,

Aargauische Pensionskasse (APK), Switzerland
Achmea Investment Management
Adrian Dominican Sisters, Portfolio Advisory Board
Align Impact
AP1 - Första AP-fonden
AP2
AP3 Third Swedish National Pension Fund
AP4 - Fourth Swedish National Pension Fund
APG Asset Management
As You Sow
ATISA Personalvorsorgestiftung der Tschümpferlin-Unternehmungen, Switzerland
Atkinson Foundation
Australian Ethical Investment
Aviva
Bâtirente

BC Government and Service Employees’ Union (BCGEU)
Bernische Lehrerversicherungskasse, Switzerland
Bernische Pensionskasse BPK, Switzerland
Bon Secours Mercy Health
Boston Common Asset Management
Boston Trust Walden
British Columbia Teachers’ Federation
Caisse Cantonale d'Assurance Populaire - CCAP, Switzerland
Caisse de pension des sociétés Hewlett-Packard en Suisse, Switzerland
Caisse de pension du Comité international de la Croix-Rouge, Switzerland
Caisse de pensions de l'Etat de Vaud (CPEV), Switzerland
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Gestion FÉRIQUE
GVA Gebäudeversicherung des Kantons St. Gallen, Switzerland
Heartland Initiative
Hermes
Hexavest
InterCapital Asset Management
Investor Advocates for Social Justice
Kempen Capital Management
Lady Lawyer Foundation
LGT Vestra
Luzerner Pensionskasse, Switzerland
Maryknoll Sisters
Mennonite Education Agency
Mercy Investment Services, Inc.
Miller/Howard Investments, Inc.
Mission Wealth Advisors, Raymond James
Natural Investments
NEI Investments
Nest Sammelstiftung, Switzerland
New York City Comptroller’s Office
New York State Common Retirement Fund
Nia Impact Capital
NN Investment Partners
Nordea Asset Management
NorthStar Asset Management, Inc.
Northwest Coalition for Responsible Investment
Office of the Vermont State Treasurer
Öhman Fonder
Palos Wealth Management Inc. - Castellum Group.
Parnassus Investments
Pax World Funds
Pensionskasse Römisch-katholische Landeskirche des Kantons Luzern, Switzerland
Pensionskasse AR, Switzerland
Pensionskasse Bank CIC (Schweiz), Switzerland
Pensionskasse Basel-Stadt, Switzerland
Pensionskasse Bühler AG Uzwil, Switzerland
Pensionskasse Caritas, Switzerland
Pensionskasse der Basler Kantonalbank, Switzerland
Pensionskasse der Stadt Winterthur, Switzerland
Pensionskasse Pro Infirmis, Switzerland
Pensionskasse Römisch-katholische Landeskirche des Kantons Luzern, Switzerland
Pensionskasse Schaffhausen, Switzerland
Pensionskasse SRG SSR, Switzerland
Pensionskasse Stadt Luzern, Switzerland
Pensionskasse Stadt St. Gallen, Switzerland
Pensionskasse Unia, Switzerland
Personalvorsorgekasse der Stadt Bern, Switzerland
PGGM
PKA A/S
Prévoyance Santé Valais (PRESV), Switzerland
Prévoyance.ne, Switzerland
Priests of the Sacred Heart, US Province
Profelia Fondation de prévoyance, Switzerland
Prosperita Stiftung für die berufliche Vorsorge, Switzerland
Raiffeisen Capital Management
Region VI Coalition for Responsible Investing
Region VI Coalition for Responsible Investment
Regroupement pour la Responsabilité sociale des Entreprises RRSE
Religious of the Sacred Heart of Mary, WAP
Rentes Genevoises, Switzerland
Responsible Asset Management, Leede Jones Gable Inc.
Responsible Sourcing Network
Retraites Populaires, Switzerland
Riverwater Partners
Robeco
RP - Fonds institutionnel, Switzerland
School Sisters of Notre Dame Cooperative Investment Fund
Seamark Asset Management
Secunda Sammelstiftung, Switzerland
Seventh Generation Interfaith Coalition for Responsible Investment
SHARE
SharePower Responsible Investing
Sisters of Charity of New York
Sisters of Instruction of the Child Jesus
Sisters of Mercy of Newfoundland
Sisters of Saint Ann (Victoria)
Sisters of St. Francis Charitable Trust, Dubuque
Sisters of St. Francis of Philadelphia
Sisters of St. Francis, Dubuque
Sisters of St. Joseph of Boston
Sisters of St. Joseph of Carondelet
Sisters of the Holy Cross
Sisters of the Presentation of the Blessed Virgin Mary, New Windsor, NY
Sisters of the Presentation of the BVM of Aberdeen SD
Socially Responsible Investment Coalition
Solothurnische Gebäudeversicherung, Switzerland
Srs. of St. Joseph of Orange
St. Galler Pensionskasse, Switzerland
Stakeholders Capital
Stiftung Abendrot, Switzerland
Storebrand Asset Management
Sycomore AM
Terre des hommes, Switzerland
The Ursulines Sisters of Chatham
Trinity Health
Unfallversicherungskasse des Basler Staatpersonals, Switzerland
Union Investment
Unitarian Universalist Association
United Church Funds
United Church of Canada Pension Plan
United Church of Canada Treasury
Université de Genève (UNIGE), Switzerland
University of St. Michael’s College

Verein Barmherzige Brüder von Maria-Hilf, Switzerland
Vermont Pension Investment Committee
Vorsorge SERTO, Switzerland
Zevin Asset Management