

Investor Statement on Human Rights and Business Activities in Iran

April 19, 2023

We, the 131 undersigned investors and their representatives with more than 352 USD in combined assets under management or advisement, express our deep concern on the current state of human rights in Iran. Since the September 16, 2022 killing of 22-year-old Mahsa (Jina) Amini by Iran's morality police for an "improper" hijab, Iran's security forces have repressed peaceful protests leading to numerous deaths, injuries and arrests.⁽¹⁾ The historical pro-democracy movement in Iran is led by women, whose slogan Woman, Life, Freedom has become the rallying cry of the movement for democracy, equality, and freedom. Criminal proceedings and the death penalty are being weaponized by the Iranian Government to punish individuals participating in protests. As investors, we condemn the Iranian Government's use of violence and harassment against peaceful protesters and in particular the discrimination against women and other minority and marginalized groups and stand in solidarity with the Iranian people.

As financial sector actors, investors play a vital role in the world's economy, with substantial leverage over a range of industry sectors, to ensure corporate respect for human rights. Investors recognise the contribution businesses can make in providing essential services and supporting the sustainable development of economies and societies. We affirm the value and importance of companies adhering to international human rights frameworks including the United Nations Guiding Principles on Business and Human Rights (UNGPs) through their operations, value chains and business relationships. The UNGPs state that all business enterprises have a responsibility to "avoid causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur".

Information and Communications Technology (ICT) companies provide products and services essential to the protection of freedom of expression, access to information, and freedom of association, through open internet access and media platforms. However, their products and services as used across the value chain can contribute to human rights risks for individuals and communities – for example, where such products and services are sold to states with weak rule of law or authoritarian governments with a history of human rights violations. Risks include contributing to and/or facilitating government surveillance, internet shutdowns, internet censorship, profiling and identifying protesters, and violating the rights to privacy, freedom of opinion and expression, and freedom of peaceful assembly and association.

As early as 2006, the Iranian government has been associated with internet restrictions and shutdowns, monitoring the use of mobile phones, hacking dissident websites and criminalisation of the sale of VPNs. Camera surveillance including through closed-circuit television surveillance has been used to identify opponents, oppress human rights proponents, and commit severe human rights abuses in Iran. In 2019, David Kaye, the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, called for an immediate moratorium on the sale, transfer and use of surveillance technology until human rights-compliant regulatory frameworks are in place.

As investors committed to human rights, we endeavor to undertake human rights due diligence by reviewing our respective portfolios and using our leverage to engage with our investee companies to address and mitigate human rights risks and harms.

¹⁾ This repression has been associated with the death of more than 500 individuals, including at least 70 children, and arrest of close to 20,000 protesters

We recommend all companies with direct or indirect business activities or business relationships connected to Iran to take immediate steps to ensure the respect for human rights in their business activities and relationships across their value chains and to align their operations with the UNGPs. These steps include:

- Publicly affirm support for human rights in Iran, in particular those of women, and recognise the key role of human rights defenders;
- Map their business activities, relationships, and/or investments across their value chain to identify and assess any human rights harms they may be causing, contributing to, or be linked to, including through the Iranian government and agencies, and state owned or linked entities;
- Conduct ongoing consultations with local and international stakeholders on how companies can best support human rights in Iran, with safeguards in place to protect local consulted stakeholders;
- Publicly report on human rights due diligence efforts and procedures in place to cease, prevent and mitigate human rights impacts associated with their activities or products in Iran, including the termination of business activities if such risks prove to be immitigable; and
- For companies with direct operations in Iran: take all necessary measures to protect their workers and the communities in which their direct operations and those across their value chain taking place in Iran.

For ICT companies

- To the extent feasible, make available products and services (in consultation with civil society) that support and promote freedom of expression and internet access (e.g. through the provision of VPN and other services used to circumvent government censorship, blocking, or filtering of apps and websites);
- Where faced with government demands for user information, censorship or to enable government propaganda, take all actions to comply with international frameworks and provide transparency to inform users of actions taken (including those that accede to government's requests); and
- In the context of surveillance by repressive regimes, carry out risk-based human rights due diligence across their value chains and where adverse human rights impacts cannot be mitigated or prevented, ICT companies may need to consider a moratorium on designing, developing, deploying, and/or selling these technologies.

Sustained business and civil society action to support the protection of human rights in Iran is essential at this historic time. The undersigned investors believe companies and investors have a responsibility to respect human rights as described by the UNGPs. The above steps will support human rights and democracy and will demonstrate business leadership by supporting the Iranian people.

Support and sign the statement

This statement has been prepared by the Regroupement pour la responsabilité sociale des entreprises (RRSE) in collaboration with the Investor Alliance for Human Rights, an initiative of the Interfaith Center on Corporate Responsibility.

For more information:

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Signed by the following investors:

Aargauische Pensionskasse (APK)
Accenture Executive Pensionskasse
Achmea Investment Management
Æquo
AkademikerPension
ATISA Personalvorsorgestiftung der Tschümperlin-Unternehmungen
AVENA - Fondation BCV 2e pilier
Bâtirente
Bernische Lehrerversicherungskasse
Bernische Pensionskasse BPK
Boston Common Asset Management
BVG-Stiftung der SV Group
Caisse Cantonale d'Assurance Populaire - CCAP
Caisse de pensions de l'Etat de Vaud (CPEV)
Caisse de pension du Comité international de la Croix-Rouge
Caisse de pensions du personnel communal de Lausanne (CPCL)
Caisse de pensions ECA-RP
Caisse de pensions Féd. int. des Stés. de la Croix-Rouge et du Croissant-Rouge
Caisse de pension Hewlett-Packard Plus
Caisse de Prévoyance de l'Etat de Genève CPEG
Caisse de Prévoyance des Fonctionnaires de Police & des Etablissements Pénitentiaires
Caisse de Prévoyance des Interprètes de Conférence (CPIC)
Caisse de Prévoyance du personnel de la Ville de Fribourg
Caisse de Prévoyance du personnel de l'Etat du Valais (CPVAL)
Caisse de prévoyance du personnel de l'Etat de Fribourg (CPPEF)
Caisse de retraite professionnelle de l'industrie vaudoise de la construction
Caisse intercommunale de pensions (CIP)
Caisse paritaire de prévoyance de l'industrie et de la construction (CPPIC)
CAP Prévoyance
CAPUVA Caisse de prévoyance des travailleurs et employeurs du commerce de détail
Cassa pensioni di Lugano
CIBC WOOD GUNDY
CIEPP - Caisse Inter-Entreprises de Prévoyance Professionnelle
Compagnie de Jsus
Congrégation des Soeurs des Saints Noms de Jésus et de Marie
Corporance Aseores
Corporate Responsibility office - Province of Saint Joseph of the Capuchin Order
CPCN - Caisse de pensions de la fonction publique du canton de Neuchâtel
Dana Investment Advisors
EFG Asset Management
Emmi-Vorsorgestiftung
Etablissement Cantonal d'Assurance (ECA VAUD)
Etablissement cantonal d'assurance et de prévention (ECAP- Neuchâtel)
Ethique et Investissement

Ethos Foundation
Evangelisch-reformierte Landeskirche des Kantons Zürich
Fondation Béati
Fondation de prévoyance Artes & Comoedia
Fonds de Prévoyance de CA Indosuez (Suisse) SA
Fondation de Prévoyance Edmond de Rothschild
Fondation de la métallurgie vaudoise du bâtiment (FMVB)
Fondation de prévoyance du Groupe BNP PARIBAS en Suisse
Fondation de prévoyance professionnelle en faveur de AROMED
Fondation de prévoyance Romande Energie
Fondation Interprofessionnelle Sanitaire de Prévoyance (FISP)
Fondation Leenaards
Fondation Patrimonia
Fondazione Ticinese per il secondo pilastro
Fondo di Previdenza per il Personale dell'Ente Ospedaliero Cantonale
Fonds interprofessionnel de prévoyance (FIP)
Future Super Group
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Gebäudeversicherung St. Gallen
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Miller/Howard Investments, Inc.
NEI Investments
Nest Sammelstiftung
Northwest Coalition for Responsible Investment
OKK Berufliche Vorsorge
Pensionskasse AR
Pensionskasse Bank CIC (Schweiz)
Pensionskasse Basel-Stadt
Pensionskasse Bühler AG Uzwil
Pensionskasse Caritas
Pensionskasse der Stadt Winterthur
Pensionskasse Graubünden
Pensionskasse Römisch-katholische Landeskirche des Kantons Luzern
Pensionskasse SRG SSR
Pensionskasse der Basler Kantonalbank
Pensionskasse der Diözese St.Gallen
Pensionskasse der Schweizer Paraplegiker-Gruppe Nottwil
Pensionskasse der Schweizerischen Nationalbank
Pensionskasse der Stadt Biel
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Pensionskasse der Stadt Zug
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Pensionskasse des Kantons Nidwalden
Pensionskasse Pro Infirmis
Pensionskasse Schaffhausen
Pensionskasse Stadt Luzern
Pensionskasse Stadt St. Gallen
Pensionskasse Unia
Personalvorsorgestiftung der Accenture Schweiz
Personalvorsorgekasse der Stadt Bern
Personalvorsorgestiftung der Ringier Gruppe
Personalvorsorgestiftung der Würth-Gruppe Schweiz
Prévoyance Santé Valais (PRESV)
Previva, fonds de prévoyance des professionnels du travail social
Profelia Fondation de prévoyance
Prosperita Stiftung für die berufliche Vorsorge
Raiffeisen Pensionskasse Genossenschaft
Rentes genevoises - Assurance pour la vieillesse
RP - Fonds institutionnel
School Sisters of Notre Dame Cooperative Investment Fund
Secunda Sammelstiftung
Seventh Generation Interfaith Coalition for Responsible Investment
SharePower Responsible Investing
Sisters of the Holy Names of Jesus and Mary - General Administration
Société des Soeurs Auxiliatrices
Spida Personalvorsorgestiftung
St. Galler Pensionskasse
Stiftung Abendrot
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