



**Interfaith Center on
Corporate Responsibility**

Inspired by faith, committed to action

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February 6, 2006

Dr. John Ruggie
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Dear Dr. Ruggie,

We, the undersigned, are faith-based and/or socially responsible investors (SRI) and research analysts concerned about the human rights record of the corporations in which we invest. Most of us are part of the Interfaith Center on Corporate Responsibility (ICCR), a coalition of 275 religious investors from the Catholic, Jewish and Protestant communities, including associate members from the SRI community.

The institutions we represent have engaged many corporations, through shareholder resolutions and dialogue, to press for the adoption of comprehensive, transparent, and verifiable human rights policies. A number of companies have responded by adopting international human rights standards and putting resources behind implementation, monitoring and training. Social investors focus on human rights for a variety of reasons, including a) the moral case, and b) the business case, which addresses risks to shareholders associated with corporate violations of human rights, including litigation, work stoppages, and loss of public trust.

As institutional investors and research analysts, we are keenly interested in your work as Special Representative on Business and Human Rights at the United Nations. International legal experts and human rights groups have noted the particular importance of your mandate to identify core standards of corporate responsibility and accountability with regard to human rights. We agree on the centrality of this element, including the assessment of the impact of these standards on the protection of human rights.

Many companies themselves have acknowledged that they want to know the "rules of the road", and that a minimum set of standards would reduce uncertainty and therefore be beneficial to business. The United Nations Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights, despite the resistance they have generated in certain quarters, can be a useful tool in this regard, as a compendium of internationally recognized norms. We are encouraged by the willingness of companies in the Business Leaders Initiative on Human Rights to road-test the Norms, and believe this process deserves encouragement.

We would also like to highlight the consensus growing around the need to rethink *entire business models* that may, by their very nature, infringe on human rights. This debate is taking place not only in the social investment community and among human rights groups, but also within and among some corporations.

Some of the most important examples of companies working to implement core human rights standards are those in which companies have begun to examine the potential impact of their business models on human rights. Recent examples include Nike (disclosure of its factory base), Gap (examination of the effect of purchasing practices on supply chain labor standards), and Bristol-Myers Squibb (loosening of adherence to rigid patents in order to make low-cost, generic AIDS drugs available in the least developed countries). We would welcome your consideration of such cases.

Where corporations take a leadership role on fundamental questions of accountability, we find real progress. However, in most cases, outsiders have had to push companies hard to change their behavior, and to move beyond a compliance or “tick-box exercise” mentality.

Finally, there is also a great deal to learn from communities most affected by corporate activity. A number of case studies based on concrete experiences of communities will help define such concepts as “complicity” and “spheres of influence.” Consultations with these communities are essential to clarifying the human rights responsibilities of companies. As Special Representative, you play an important role in moving this process to the next level.

As investors and research analysts, we have learned from our direct engagements with companies on human rights and we offer our expertise to assist you in the formidable task you have assumed. We would welcome a face-to-face meeting in the near future with you and a representative group of the faith-based and socially responsible investment community. We will contact you shortly to follow up.

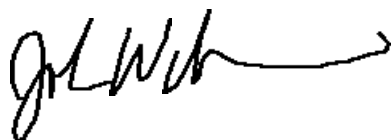
Sincerely,



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