

RESOLVED: That shareholders of SunTrust Banks, Inc. (SunTrust) urge the Board of Directors to establish a Board Committee on Human Rights, to create company policies and review existing policies, above and beyond matters of legal compliance, on the human rights of individuals in the US and worldwide, including adopting and assessing criteria for evaluating potential clients' corporate social responsibility record and human rights performance.

Supporting Statement: SunTrust is reportedly a source of funding for MVM, Inc. and Comprehensive Health Services, which are directly contracted to U.S. government agencies carrying out the "zero tolerance" immigration policies that have led to family separations and child detentions. According to the United Nation's (UN's) Office of the High Commissioner for Human Rights, the practice of separating children at the border constitutes "arbitrary and unlawful interference in family life, and is a serious violation of the rights of the child," including those rights articulated in the UN Convention on the Rights of the Child, and in other relevant instruments and standards.

In addition, SunTrust has had the following financial relationships with CoreCivic and GEO Group, corporations which operate private prisons: (1) extended revolving credit, (2) provided the two companies with term loans, and (3) underwrote the two companies' bonds (https://www.inthepublicinterest.org/wp-content/uploads/ITPI_BanksPrivatePrisonCompanies_Nov2016.pdf). These private prisons are the subject of claims of alleged human rights abuses, as noted in recent reports and lawsuits, including inmate deaths, poor medical care, allegations of physical and sexual abuse of detainees and violence (<https://www.hrw.org/news/2016/07/07/us-deaths-immigration-detention>).

The UN Guiding Principles on Business and Human Rights (UNGPs)—unanimously adopted by the UN Human Rights Council in 2011—clarify the roles and responsibilities of states and businesses with regard to human rights. While governments have a duty to protect human rights, companies have a responsibility to respect human rights by exercising human rights due diligence to identify, prevent, mitigate and account for how they address their adverse human rights impacts regardless of whether the state upholds its duty, and both must provide remedy to victims of corporate related abuses. Principle 13b of the UNGPs asserts that the corporate responsibility to respect human rights extends to situations where corporations may be directly linked to adverse human rights impacts through business relationships, "even if they have not contributed to those impacts".

In order to allay reputational risks and business risks, SunTrust should evaluate its exposure to corporate entities that interfere with human rights, especially on issues of detention.

Establishing a separate Board Committee on Human Rights would elevate board level oversight and governance regarding human rights issues implicated by the company's activities and policies and provide a vehicle to fulfill the Board's fiduciary responsibilities for oversight of these issues.