



**Interfaith Center on
Corporate Responsibility**

Inspired by faith, committed to action

475 Riverside Drive, Suite 1842
New York, NY 10115-0050
www.iccr.org

Tel: 212-870-2295
Fax: 212-870-2023
info@iccr.org

February 6, 2006

Dr. John Ruggie
United Nations Secretary General's Special Representative on Human Rights and Business
Harvard University
Center for Business and Government
John F. Kennedy School of Government
Weil Hall, 79 John F. Kennedy Street
Cambridge, MA 02138
john_ruggie@harvard.edu

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.

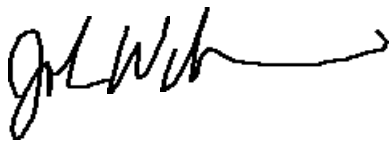
Sincerely,



Rev. David M. Schilling
Director of Global Corporate Accountability
Interfaith Center on Corporate Responsibility
212-870-2928



Doris Gormley
SRI Consultant
National Jesuit Conference



John Wilson
Director of Socially Responsible Investing
Christian Brothers Investment Service



Elizabeth Umlas
Senior Research Analyst
KLD Research and Analytics

Signers:

Rev. Séamus P. Finn OMI
Missionary Oblates
Justice, Peace & Integrity of Creation
Washington, DC

Andy Stern
President
Service Employees International Union
Washington, DC

Marc de Sousa - Shields
Enterprising Solutions
Mexico

Sr. Susan Mika, OSB
St. Scholastica Monastery
Benedictine Sisters of Boerne, Texas
Boerne, TX

Executive Director
Socially Responsible Investment Coalition
San Antonio, TX

Laurence Loubières
Meeschaert Asset Management
Paris, France

Shelley Alpern
Director of Social Research & Advocacy
Trillium Asset Management
Boston, MA

Susan White, Director
Oneida Nation Trust/Enrollment
Committee
Oneida Tribe of Indians of WI
Oneida, WI

Sister Barbara Aires
Sisters of Charity of Saint Elizabeth
Convent Station, NJ

Timothy Smith
Senior Vice President
Walden Asset Management
Boston, MA

Bishop Jo Seoka, Chair
John Capel, Executive Director
Bench Marks Foundations (BeFSA CSR)
Johannesburg, South Africa

Miles Litvinoff
Coordinator
Ecumenical Council for Corporate Responsibility
Oxford, United Kingdom

Adam Kanzer
General Counsel & Director of Shareholder Activism
Domini Social Investments
New York, NY

Sister Annette M. Sinagra, OP
Portfolio Advisory Board
Adrian Dominican Sisters
Adrian, MI

Bro. John Celichowski, OFM Cap.
Board of Directors
Franciscans International
New York & Geneva

Vidette Bullock Mixon
Director, Corporate Relations
General Board of Pension and Health Benefits
The United Methodist Church
Evanston, IL

Rev. Joseph P. La Mar, M.M.
Office, Corporate Social Responsibility
Maryknoll Fathers and Brothers
Maryknoll, NY

Lauren Compere
Steven Heim
Dawn Wolfe
Boston Common Asset Management, LLC
Boston, MA

Linda Hayes, OP
Dominican Sisters of Springfield, IL
Springfield, IL

Frank Rauscher
Aquinas Associates
Dallas, TX

Donna Meyer, Ph.D.
CHRISTUS Health
Irving, TX

John C. Harrington
Harrington Investments, Inc.
Napa, CA

Sr. Claire Regan
Corporate Responsibility Coordinator
Sisters of Charity of St Vincent de Paul of
New York

Bro. Steven O'Neil, SM
Marianist Province of the United States
St. Louis, MO

Richard Hausman
Clean Yield Asset Mgmt
Greensboro, VT

Mary Brigid Clingman OP
Councilor of Mission and Advocacy
Dominican Sisters
Grand Rapids, MI

John L. Liechty
Senior Vice President Financial Services
Mennonite Mutual Aid
Goshen, IN

Rev. Mathias Doyle, OFM
Franciscan Office of Justice & Peace
St. Anthony Shrine
Boston, MA

Ruth Kuhn, SC
Coordinator
Region VI Coalition for Responsible Investment
Sisters of Charity of Cincinnati, OH

Constance Brookes
Executive Director
Friends Fiduciary Corporation
Philadelphia, PA

Rose Marie Stallbaumer, OSB
Benedictine Sisters of Mount St. Scholastica in
Atchison, KS

Joellen Sbrissa, CSJ
Chair, Social Responsible Investments Committee
Sisters of St. Joseph of La Grange
La Grange Park, IL

Nathalie Fessol
Managing Editor
ISR Info
Member of the French Social Investment Forum

Mary Ellen Gondeck, SSJ
Office of Peace and Justice
Sisters of St. Joseph
Nazareth, MI

Susan Vickers, RSM
Catholic Healthcare West
185 Berry St., Suite 300
San Francisco, CA 94107

Maria Cimperman
Assistant Professor of Moral Theology
Oblate School of Theology
San Antonio, TX
Susan Jordan, SSND, Coordinator
Midwest Coalition for Responsible
Investment
St. Louis, MO

Pat Zerega
Director, Corporate Social Responsibility
Program Unit for Church in Society
ELCA
Pittsburgh, PA

Joseph Keefe, CEO
Pax World Funds
Portsmouth, NH

Allan Moskowitz, CFP
President
Progressive Wealth Management
San Lorenzo, CA

Ann Fryberger
President
Fryberger Capital Management, Inc.
Duluth, MN 55803

James Donovan, CPA
Member of the Socially Responsible
Investment Coalition
Member of the CHRISTUS Health Socially
Responsible Investment Advisory
Committee
Advocate, Interfaith Center on Corporate
Responsibility
Texas, USA

Justice Committee
Congregation (of Sisters) of St. Joseph,
Cleveland, OH

Judy Byron, OP
Northwest Coalition for Responsible Investment
Seattle, WA

Sister Patrice Sullivan, CDP
Congregation of Divine Providence
1507 Cincinnati Ave.
San Antonio, TX 78201
USA

Nora. M. Nash, OSF
Director, Corporate Social Responsibility
Sisters of St Francis of Philadelphia
Aston, PA

Jo Ann Carmona, Executive Secretary
Congregation of the Sisters of Charity of the Incarnate
Word
Houston, TX

Linda Pei
FEMMX Financial, Women's Equity Fund
San Francisco, CA

Ann Oestreich IHM
Congregation Justice Coordinator
Sisters of the Holy Cross
Notre Dame, IN

Valerie Heinonen, OSU
Dominican Sisters of Hope
Mercy Investment Program
Sisters of Mercy Regional Community of Detroit
Ursuline Sisters of Tildonk-U.S. Province
New York, NY

Sisters of Charity, BVM
Dubuque, IA

Sister Edna Hess C.PP.S
Treasurer
Sisters of the Precious Blood
Dayton, OH

Daniel G. Tretow
St. Francis, Inc.
Milwaukee, WI

Roberta Mulcahy, SSJ
SRI Coordinator
Sisters of St. Joseph of Springfield, MA

Sister Anita Whitely, OSU
Corporate Responsibility Committee
Ursuline Sisters of Cleveland, OH

Jim Madden
Progressive Investment Management
Portland, OR

Joe Carson, P.E.
President
Affiliation of Christian Engineers
Knoxville, TN

Sr. Jo Ann Jansing
Leadership Team
Ursuline Sisters of Louisville, KY

Irina Branzburg
Miller/Howard Investments, Inc
Woodstock NY USA

Sister Frances A. Renn
Sisters of the Sorrowful Mother
Parsippany, NJ

Sister Anne DeConcini RSM
Coordinator of Socially Responsible Investing
Sisters of Mercy
Merion, PA

Florence Speth, S.C.
Fox House
New York, New York

Karen White
Bluffton, South Carolina