



**Interfaith Center on Corporate Responsibility - Human Trafficking Investor Statement—June 27, 2011**

For over two decades, members of the Interfaith Center on Corporate Responsibility (ICCR), a coalition of nearly 300 faith-based and values-driven institutional investors representing \$100 billion in assets under management, have been pressing businesses to scrutinize their supply chains and operations to ensure that they are not inadvertently complicit in human rights violations, specifically, violations associated with human trafficking and modern day slavery, including child labor, forced labor and slave labor.

Current trends around supply chain issues indicate that these practices will soon be legislated. Today we are calling on companies to proactively develop human rights policies that specifically address human trafficking and modern day slavery and request that these policies are integrated into business plans, and that public reporting on these measures be made available to both current and future investors. We also call on companies to work in collaboration with other stakeholders to eradicate these egregious human rights abuses.

Human Trafficking Defined

For reference, we use the definition of human trafficking provided in the United Nations “Palermo Protocol of 2000” by the UN Global Initiative to Fight Human Trafficking.<sup>1</sup>

**ACT:** Human trafficking involves the recruitment, transportation, transfer, harboring and/or receipt of a person.

**MEANS:** It can include the threat or use of force, deception, abduction, the abuse of power or a position of vulnerability, or other form of coercion.

**PURPOSE:** The purpose of human trafficking is exploitation, which can include the prostitution of others, forced labor, slavery or servitude.<sup>2</sup>

Business Case for Action

Beyond the obvious moral mandate, non-compliance on human rights issues, including human trafficking and modern day slavery, carries genuine material and reputational risk which could deleteriously impact the value of our investments. Conversely, comprehensive assessments of potential exposure to human rights violations throughout the entire supply chain are an essential measure of sound governance building trust and, consequently, value in the brand. Increasingly, business supply chain reporting on human rights issues is being legislated. Recent examples include: a) the *California Transparency in Supply Chain Act* requiring retailers and manufacturers doing business in California to publicly report their efforts to train company employees on human trafficking and slavery in supply chains and; b) the Conflict Minerals Special Disclosures provision of the Dodd-Frank Financial Reform Act which requires U.S. listed companies from the electronics industry and other sectors to trace and disclose use of conflict minerals from the Congo and surrounding region.

Voluntary reporting preempts what will inevitably be required by law and sends a strong message to investors and consumers that these violations are taken seriously and will be eradicated.

ICCR's Human Rights Legacy

ICCR member advocacy on human rights issues began with our work in the 1980s to address sweatshop labor in the apparel industry. Since then we have focused on child labor in the cocoa fields in Africa and the cotton fields in Uzbekistan; child and slave labor in the coffee fields of Latin America, slave labor in Brazil associated with the production of pig iron; and exposure to conflict minerals sourced from the Democratic Republic of Congo. Most recently, our faith-based investors addressed one of the most sensitive human rights abuses – child sex tourism – in the hotel and tourism industry, which impacts up to 2 million children globally. Our efforts have yielded tangible results, in many

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<sup>1</sup>[http://www.uncjin.org/Documents/Conventions/dcatoc/final\\_documents\\_2/convention\\_%20traff\\_eng.pdf](http://www.uncjin.org/Documents/Conventions/dcatoc/final_documents_2/convention_%20traff_eng.pdf)

<sup>2</sup> *Human Trafficking and Business: Good Practices to Prevent and Combat Human Trafficking*, [www.ungift.org](http://www.ungift.org).

cases leading to the adoption of industry-wide protocols in cross-sector supply chain management and the development of corporate codes of conduct which include human trafficking and modern day slavery measures.

### Proactive Steps for Companies

A number of companies are to be commended for showing leadership on this issue including Carlson, Gap, HP, LexisNexis and Manpower, among others. In order for companies to demonstrate respect for human rights, they must implement due diligence processes that incorporate the following:

1. A policy stating the company's commitment to respect human rights;
2. An assessment of actual and potential human rights impacts, including human trafficking and modern day slavery;
3. Integration of the policy and corresponding assessment into internal oversight systems and monitoring programs;
4. Training of employees, contractors and vendors;
5. A clause in contracts with suppliers, host-government agreements and joint ventures stating a common repudiation of human trafficking to ensure that their conduct is consistent with human rights standards.
6. Alliances with appropriate authorities including police, anti-trafficking organizations, child welfare agencies and public-private partnerships with governmental and international institutions;
7. Contribution to the prevention of trafficking, including awareness raising and educational campaigns;
8. Annual public reports on performance.

### Guideposts

- Companies in the travel and tourism industry are strongly urged to adopt the ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes) code addressing the sexual exploitation of children.<sup>3</sup>
- Other sectors are encouraged to look at the Athens Ethical Principles and the accompanying *Luxor Implementation Guidelines to the Athens Ethical Principles: Comprehensive Compliance Programme for Businesses* under the End Human Trafficking Now initiative for guidance.<sup>4</sup>
- Lastly, all companies are urged to review the "Guiding Principles for Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework" to be presented to the UN Human Rights Council by Professor John Ruggie, the UN Secretary-General's Special Representative for Business and Human Rights.<sup>5</sup>

### Multi-Stakeholder Collaboration

Because human trafficking is so egregious and pervasive, companies need to go beyond individual initiatives to partner with other industry leaders and non-governmental organizations in multi-stakeholder initiatives and public-private partnerships that are actively confronting this issue. Public education and awareness campaigns are required if consumers, citizens and governments are to place human trafficking at the top of their agenda. Specifically, companies are urged to participate in initiatives like the newly-forming Business Coalition against Human Trafficking comprised of company representatives from a broad cross-section of industries which focus on achieving long-term sustainable change.

The United Nations Global Initiative to Fight Trafficking, which works with all stakeholders, including governments, business, academia, civil society, investors and the media, has developed effective tools to end human trafficking.

### Summary

As investors, we are concerned with the serious material and reputational risks posed by human trafficking and modern day slavery to corporate operations and their supply chains. We believe progress will be made as companies implement verifiable human rights due diligence processes, work collaboratively with other stakeholders and make transparent what has long been hidden.

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<sup>3</sup> <http://www.thecode.org>

<sup>4</sup> [http://www.unglobalcompact.org/docs/issues\\_doc/human\\_rights/Resources/Luxor\\_Implementation\\_Guidelines\\_Ethical\\_Principles.pdf](http://www.unglobalcompact.org/docs/issues_doc/human_rights/Resources/Luxor_Implementation_Guidelines_Ethical_Principles.pdf)

<sup>5</sup> <http://www.business-humanrights.org/SpecialRepPortal/Home/Protect-Respect-Remedy-Framework/GuidingPrinciples>

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

Susan Vickers, RSM  
VP Community Health  
Catholic Healthcare West

Constance Brookes  
Executive Director  
Friends Fiduciary Corporation

Lauren Compere  
Managing Director  
Boston Common Asset Management

Michael H. Crosby, OFMCap  
Corporate Responsibility Office  
Province of St. Joseph of the Capuchin Order  
Milwaukee, WI 53233

Susan Smith Makos  
Director of Social Responsibility  
Mercy Investment Services, Inc.  
Sisters of Mercy of the Americas

Rev. Robert K Finnegan, O.Praem.  
Treasurer  
The Premonstratensian Fathers

S. Dolores Hrdina  
Treasurer  
The Sisters of Mercy of the Holy Cross

Sister Marilyn Vollmer, Provincial  
Sisters of the Sorrowful Mother,  
US/Caribbean Province

Sonia Kowal  
Director of Socially Responsible Investing  
Zevin Asset Management, LLC

Mary Ann Krems,  
BVM Associate

Margaret Weber  
Corporate Responsibility Director  
Congregation of St. Basil

Gwen Farry, BVM  
Sisters of Charity, BVM  
Agnes Schneider, OP  
Racine Dominican SRI Coordinator  
Racine Dominicans Socially Responsible  
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Sisters of the Presentation in Aberdeen  
Diocese of Springfield, IL  
Mother of God Monastery or Benedictines of  
Watertown, SD

Kathleen Coll, SSJ  
Administrator, Shareholder Advocacy, MS 222  
Catholic Health East

Mary Ellen Gondeck, CSJ  
Office of Peace and Justice  
Congregation of St. Joseph

Patricia A. Keefe, OSF  
Human Trafficking Working Group  
Rochester, MN Franciscans

Tim Brennan  
Treasurer & CFO  
Unitarian Universalist Association

Debra Marie Sciano, SSND  
Betty Uchytel, SSND  
Shawnee Marie Daniels-Sykes, SSND  
Jan Gregorcich, SSND  
Anne Arthur Klinker, SSND  
Barbara Pfarr, SSND  
Dana Russart  
Tim Dewane  
School Sisters of Notre Dame – Milwaukee  
Province Corporate Responsibility Committee

Mary Beth Hamm SSJ  
Social Justice Coordinator  
Sisters of Saint Joseph of Chestnut Hill,  
Philadelphia

Sara L Walch  
Member  
Sisters of Saint Francis Human Trafficking  
Working Group, Rochester, MN (Assisi  
Heights).

Barbara Jennings, CSJ  
Coordinator  
Midwest Coalition for Responsible Investment

Rian Fried  
President  
Clean Yield Asset Management

Pierre Viau  
Directeur  
Regroupement pour la Responsabilité sociale  
des Entreprises

Patricia Jurewicz  
Director  
Responsible Sourcing Network

Katie McCloskey  
Director, Corporate Social Responsibility  
Pension Boards – United Church of Christ, Inc.  
United Church Funds

Sister Estrella Castalone, Coordinator  
International Union of Superiors General  
Talitha Kum Network  
Rome, Italy

Toni Palamar  
Province Business Administrator  
Sisters of the Good Shepherd

Ann Oestreich IHM  
Congregation Justice Coordinator  
Sisters of the Holy Cross Congregation Justice  
Committee

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Vice President, Advocacy & Public Policy  
St Joseph Health System

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President and Professor of Theology  
Starr King School for the Ministry  
Berkeley, CA

Patricia Anne Cloherty, PBVM, chair  
Sisters of the Presentation  
Community Support Trust

Sister Susan Schorsten, H.M.  
Pastoral Leader  
Sisters of the Humility of Mary

Steve Mason  
Coordinator of Socially Responsible Investing  
Activities  
Church of the Brethren Benefit Trust

Martha Knight  
Treasurer, Women's Division  
General Board of Global Ministries United  
Methodist Church

David Wildman  
Executive Secretary, Human Rights & Racial  
Justice  
General Board of Global Ministries United  
Methodist Church

Timothy Smith  
Senior Vice President  
Director of ESG Shareowner Engagement  
Walden Asset Management

Susan Baker  
Portfolio Manager / Analyst  
ESG Research & Shareholder Advocacy  
Trillium Asset Management Corporation

Sister Marita Beumer, Councilor  
Sister Madonna Ratermann, Councilor  
Leadership Team of the Sisters of the Precious  
Blood

Margaret Diener, OP  
Chair, Socially Responsible Investment  
Committee  
Dominican Sisters of San Rafael.

Stephen Viederman  
Christopher Reynolds Foundation

Mark Regier  
Director of Stewardship Investing  
Everence Financial

Carole Lombard CSJ  
Sisters of St. Joseph of Boston  
Director of Justice and Peace

Patricia M. Simpson, Administrator  
Endowment Investment Committee of the  
Paulist Center Community, Boston, MA

Sister Clarita Trujillo  
General Treasurer  
Our Lady of Victory Missionary Sisters

Eileen Gannon, OP  
Executive Team Member  
Dominican Sisters

Sister Helen McDonald SHCJ,  
Provincial Leader  
Society of the Holy Child Jesus American  
Province - Rosemont, PA

John Capel, Executive Director; Bench Marks  
Foundation, South Africa

Marie Lucey, OSF  
Associate Director for Social Mission  
LCWR

Julie Tanner  
Assistant Director of Socially Responsible  
Investing  
Christian Brothers Investment Services, Inc.

Allan E. Wentzel, Chair,  
CDT Foundation,  
South Africa

Judy Byron, OP  
Intercommunity Peace & Justice Center  
Northwest Coalition for Responsible  
Investment

Ethel Howley, SSND  
Social Responsibility Resource Person  
School Sisters of Notre Dame Cooperative  
Investment Fund

Stella Storch, OP  
CSA Justice Coordinator  
Congregation of Sisters of St. Agnes - Fond du  
Lac, WI

Roberta Mulcahy, SSJ  
Socially Responsible Investment Coordinator  
Sisters of St. Joseph of Springfield

Donna Meyer, Ph.D.  
SRI Consultant  
CHRISTUS Health

Cathy Rowan  
Corporate Responsibility Coordinator  
Maryknoll Sisters

Frank Rauscher  
Senior Principal  
Aquinas Associates

The Human Trafficking Working Group of the  
Sisters of Saint Francis, Rochester, MN

Sister Joellen Sbrissa, CSJ  
Congregation of St. Joseph

Adam M. Kanzer, Esq.  
Managing Director & General Counsel  
Domini Social Investments LLC

Socially Responsible Investments Committee  
Sisters of St. Francis of Assisi

Mari Lotvonen  
M & E Consultation  
H.O.P.E. Africa  
Capetown, South Africa

Edward Gerardo  
Director, Community Commitment and Social  
Investments  
Bon Secours Health System, Inc.

Patricia Marshall, SBS  
Social Justice Office Director  
Sisters of the Blessed Sacrament

Bro. Steven O'Neil, SM  
Marianist Province of the US

John Gonzalez  
Passionist SRI Project

Miles Litvinoff  
Co-ordinator  
The Ecumenical Council for Corporate  
Responsibility (ECCR)

Meghan Moore  
Assistant SRI Analyst  
Legg Mason & Co., LLC

Mary Dowd, OSU  
Alice M. Giordano, osu  
JPIC Office  
Ursulines of the Roman Union, Eastern  
Province

Society of St. Ursula - US Region

Joy Peterson, PBVM  
Shareholder Advisory Committee  
Sinsinsawa Dominicans

Robert J. Benz  
Founder & Executive Vice President  
Frederick Douglass Family Foundation

Rev. Séamus P. Finn, OMI  
Director  
Justice, Peace and Integrity of Creation Office  
Missionary Oblates of Mary Immaculate

Leadership Team of the Sisters of Providence  
(St. Mary-of-the-Woods, IN)

Sister Barbara Aires  
Sisters of Charity of Saint Elizabeth, NJ

Patricia A. Daly, OP  
Tri-State Coalition for Responsible Investment  
Sisters of St. Dominic of Caldwell, NJ