



Business & Human Rights Resource Centre
Attn: Laura Waldman

September 17, 2018

Dear Business & Human Rights Resource Centre,

Thank you for contacting us as part of your initiative to share how Financial Institutions (FI) approach human rights with Investors and others that are interesting in understanding how leading FI's conduct due diligence and engage with mining companies to ensure the protection of human rights for workers and communities.

Given that we have a duty to respect the privacy and confidentiality of our clients, we are providing general comments related to the issues identified in the email.

RBC aims to ensure our client relationships meet our own high standards and what our clients, employees, and shareholders expect of us. This means that for prospective and existing clients with business activities that may pose environmental or social issues, there is a rigorous process in place to identify and assess any associated risks, and if we pursue or maintain the business relationship, we ensure appropriate steps are taken to mitigate those risks. This is embedded in our environmental and social risk management (ESRM) policies that seek to identify, assess and mitigate the environmental and social risks that may be associated with projects and activities our clients are involved with and for which we may provide financial products. This includes risks related to climate change, human rights, land and resources use, biodiversity, water quality and availability, environmental regulation, community relations, indigenous peoples' rights and consultation, and responsible lending (e.g., military materiel, tobacco, casinos, etc.). For additional details visit [RBC Responsible Financing](#).

RBC has also been a signatory of the [Equator Principles](#) (EP) since 2003 and is committed to meeting our requirements as an Equator Principles Financial Institution. RBC applies the Equator Principles to applicable project finance, project finance advisory services, and project-related corporate loans and therefore identifies, assesses, and seeks to manage and/or mitigate the environmental and social impacts of these projects. This process includes the engagement of an independent environmental and social (E&S) consultant to conduct an E&S review of high risk projects. On an annual basis RBC publishes an Equator Principles report that identifies EP projects and includes information such as the risk categorization, sector, and location.

In 2017, RBC published our [Modern Slavery Act statement](#) that outlined steps that RBC has taken to ensure slavery and human trafficking are not taking place in our supply chains or in our business.

We also acknowledge that practices continue to evolve and we take stakeholder input seriously. We are committed to advancing our risk management processes as we learn from the experiences of our peers and feedback shared by stakeholders.

Thank you again for the opportunity to respond.

Sincerely,

Royal Bank of Canada