

Assessing bank responses to human rights violations: Criteria in full

Criteria 1: Response

Requirement: The bank responds publicly and in sufficient detail to allegations of adverse human rights impact(s) linked to its finance.

Requirements for full and half score

Full score: The bank responds publicly to the allegations in a way which comments on and responds to the substance of the issues raised, and its response acknowledges its link to the impact.

Half score: The bank responds publicly to the allegations and its response acknowledges its link to the impact, but without detailing specific actions taken,

OR the bank responds publicly to the allegations and its response details specific actions taken in response to the impact (e.g. engagement with the company) but without acknowledging the bank's link.

(Note: where the bank confirms there is no link to the impact, the impact will not be considered for scoring.)

No score: The bank does not respond publicly, or its response does not comment on or respond to the issues raised. There is no score for responses which only confirm receipt, or which set out that the bank is unable to comment on the specific company concerned.

Criteria 2: Action

Requirement: The bank takes appropriate action towards resolving the impact (either by itself or through engagement with its client or investee company).

Requirements for full and half score

Full score: The bank sets out publicly that it has engaged with the client or investee company regarding the allegations of adverse human rights impact(s) linked to its finance AND sets out that it has required the company to take specific actions tailored to the situation at hand within a reasonable timeline for the actions to be taken.

OR the bank sets out how it has taken appropriate action sought by affected rights-holders; for example by disengaging with the company or project at hand (where this constitutes an appropriate action according to rights-holders) or by participating in remediation which is considered appropriate by rights-holders involved in raising the issue with the bank.

OR if the bank denies the allegation, it still engages in a dialogue with the company reportedly involved in the allegation to ensure that it has engaged with affected stakeholders AND provides evidence of having management systems in place that are sufficient to prevent such impacts from occurring in the future.

Criteria 2 (continued)

Requirements for full and half score

Half score: The bank sets out the details of its engagement with the client or investee company regarding the allegations of adverse human rights impact(s) linked to its finance.

OR the bank provides evidence of having reviewed its management systems to prevent such impacts from occurring in the future, but without this being considered an appropriate and sufficient remedy by rights-holders involved in raising the issue with the bank.

OR if the bank denies the allegation, it still engages in a dialogue with the company reportedly involved in the allegation to ensure it has engaged with affected stakeholders.

Criteria 3: Monitoring

(for impacts that were raised to the bank at least a year ago)

Requirement: the bank monitors the measures taken by its client or investee company and assesses the engagement process.

OR the bank monitors the impact on rights-holders of the action it took itself.

Requirements for full and half score

Full score: The bank monitors the progress of the company against its Action Plan, checking in at least after 12 months and periodically each year, and discloses that it has done so.

AND the bank makes intermediate assessments on the engagement process, including the execution of the company's Action Plan and shares these with the company. The bank collects stakeholder views on at least the following questions: Have the human rights abuses been addressed; has the company provided victims with adequate remedy?

OR the bank monitors the impact on rights-holders involved in raising the issue with the bank of the action it took itself (e.g. disengaging from the project or participating in remediation).

Half score: The bank monitors the progress of the company against its Action Plan, checking in at least 12 months and periodically each year, and discloses that it has done so.