



Business & Human Rights Resource Centre
Attn: Christen Dobson & Marti Flack
120 Wall Street, 16th Floor
New York, NY 10005

Sent via Email

January 18, 2018

Dear Business & Human Rights Resource Centre,

Thank you for notifying us that you plan to include Bank Track's report "How Banks Contribute to Human Rights Violations" in your next Weekly Update and for giving us the opportunity to provide additional information related to Royal Bank of Canada's (RBC) involvement in the financing of the Trans Mountain Pipeline Expansion Project.

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 Report.

RBC's [Code of Conduct](#) (the "Code") sets out the ethical principles by which all employees, contract workers and members of the Board are bound. These principles include a clear statement as to the individual and collective accountability for the social and economic effects of business decisions on communities in which we operate, including compliance with all applicable laws regarding non-discrimination and human rights.

We highly value the relationship we have with Indigenous peoples and clients. We believe that resource development projects need to be done in a transparent and inclusive manner. This includes real, meaningful and lasting consultations with Indigenous peoples and local communities in project development.

We respect that these projects are complex and that there is a diversity of perspectives on the development and transportation of energy resources amongst Indigenous and local communities. Canada's project approval process, through the National Energy Board, provides an opportunity for concerns to be heard and requires consultation with potentially affected Indigenous groups. We are encouraged by the steps that the government has taken to advance this important topic in Canada.

RBC ensures that all projects we finance receive relevant approvals, and we conduct due diligence that considers environmental and social risks to ensure that we adhere to internal risk management processes. This involves applying the [Equator Principles](#) to projects that we finance, which includes ongoing monitoring over the life of the loan. This ensures that we identify, assess and manage environmental and social risks associated with projects. For additional details visit [RBC Responsible Financing](#).

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