

Business & Human Rights Resource Centre Ms.
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Date

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Contact

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Subject

Facing Finance's "Call-to-Action" to funders and investors of Aurubis

Dear Business and Human Rights Resource Center stakeholders,

Many thanks for your invitation to respond to Facing Finance Germany's "Call-to-Action" to funders and investors of Aurubis. They are advocating for transparency in Aurubis' supply chain, by asking for Aurubis to disclose which South American mines they source their copper concentrates from. Facing Finance Germany has concerns regarding alleged human rights and environmental issues at South American mines where Aurubis is potentially sourcing copper.

ING commits to respect human rights in accordance with the United Nation Guiding Principles on Business and Human Rights (UNGPs) and to uphold the international human rights described in the Universal Declaration on Human Rights. As a global bank that services clients in many sectors around the world, ING can be a driving force for local economies and contribute to positive economic, environmental and social development.

At the same time, our business engagements with clients may potentially associate ING with adverse human rights impacts. To help prevent ING from financing such adverse impacts, as well as contributing to the advancement of human rights, we conduct due diligence as described in our [Environmental and Social Risk \(ESR\)](#) Framework. Human rights and Climate-related and Environmental risks are overarching policies that are applicable to all clients in scope of the ESR framework. In addition, the framework includes sector-specific requirements we need to assess, for example, for clients active in the in metals and mining sector.

We aim to respect human rights and we expect our clients to do the same. We engage our clients on potential human rights impacts in their operations and/or in their supply chains, how they are addressing those impacts and to look at best practices in different sectors. As such, we will engage with Aurubis on the matters highlighted by Facing Finance. It is important to note that due to client confidentiality agreements we cannot disclose the outcomes of this dialogue.

Kind regards,

ING Bank