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Dear Danielle

Thank you for your email of 9th January offering the opportunity to respond to the BankTrack report benchmarking bank policies and practices against the UN Guiding Principles on Business and Human Rights.

I confirm that we sent BankTrack details of Barclays' policies and disclosures when they informed us that they were conducting this research, including our Group Statement on Human Rights which was first published in 2004. Since then Barclays has been a leading participant in both sectoral and cross-sectoral initiatives focusing on the corporate responsibility to respect and uphold human rights. These initiatives include the Business Leaders' Initiative on Human Rights, the UN Environment Programme Finance Initiative (UNEP FI) Social Issues working group and the Thun Group of Banks (which is quoted in the report). Barclays also leads the Social Risks working group of the Equator Group of Banks which has contributed to the revised and strengthened human rights component of the Equator Principles (social and environmental criteria applicable to project finance).

Policy commitment: This work is an important and longstanding aspect of our commitment to be a responsible and socially aware organisation and to act in accordance with both our own corporate values and with internationally accepted standards and principles such as the Universal Declaration on Human Rights and associated Covenants, the International Labour Organisation's core conventions and treaties and the UN Guiding Principles. We know that expectations of our and other sectors in implementing the Guiding Principles are high and, as part of our commitment to continuous improvement, Barclays Statement on Human Rights is currently undergoing detailed review and revision to take further account of the Principles and related developments in the area of human rights. We will continue to update our approach as good practice is developed and defined.

Due diligence commitment: Our people management, product development, credit risk management and supplier screening policies and practices take human rights into account and we have a referral and escalation system (up to Executive Committee or Board level if appropriate) to ensure that any material human rights risks or impacts identified can be evaluated fully, and mitigation measures agreed, as part of the decision-making process.

Reporting: We report on our human rights related activities via our Annual Report and Citizenship reporting and human rights are explicitly referenced in Barclays' global code of conduct.

Access to remedy: Barclays has channels through which employees, clients, investors and others may raise issues of concern. As part of our commitments as an adopter of the Equator Principles, when providing project related finance we ensure the project sponsor companies conduct community consultation, ongoing engagement and provide affected communities with access to an appropriate grievance mechanism so that local concerns can be identified and addressed.

The following examples highlight recognition of Barclays' work in human rights related areas:

In December 2014, Barclays was named a Stonewall Star Performer for our achievements in workplace equality. Star performers are organisations that consistently rank in the top ten of the Stonewall Workplace Equality Index and are committed to sharing best practices and mentoring other organisations who are working to create a workplace culture that's inclusive of LGBT individuals.

We were similarly recognised by the Business Disability Forum as winners in four categories of the Disability Smart awards.

Barclays is also accredited as a national Living Wage Employer in the UK by the Living Wage Foundation and is a longstanding supporter of this voluntary initiative.

Such recognition underlines that we are on track with the public commitment made by Sir David Walker, Barclays Chairman, to be the most inclusive and accessible bank for our colleagues, customers and clients.

Thank you again for the opportunity to comment.

Yours sincerely,

Philippa Birtwell  
Director  
Corporate Relations