May 10, 2011

John G. Ruggie
Special Representative of U.N. Secretary General for Business and Human Rights
Harvard Kennedy School of Government
79 JFK Street
Cambridge, MA 02138

Dear Professor Ruggie:


For both investors and companies, the document offers a common structure that can inform dialogue about the proper role of corporations in addressing human rights concerns. TIAA-CREF’s Corporate Governance Policy Statement indicates that “companies should strive to respect [human] rights by developing policies and practices to avoid infringing on the rights of workers, communities and other stakeholders throughout their global operations.” In our discussions with corporations about their human rights policies, we have learned that many have found that the “Protect, Respect and Remedy” framework resolves many longstanding uncertainties surrounding the corporate responsibility to respect human rights.
We have also been grateful for the open and transparent way that your organization has conducted this inquiry, which we believe is one reason for its broad acceptance by diverse stakeholders. TIAA-CREF believes that the Guiding Principles make an important and useful contribution to the ongoing global effort to assure respect for human rights.

Sincerely,

John Wilson
Director – Corporate Governance