

Lockheed Martin

Dear Mr. Phelps,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Lockheed Martin's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,ⁱ which is primarily implemented by DHS, violated International Human Rights.ⁱⁱ We asked if Lockheed Martin had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.ⁱⁱⁱ

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Lockheed Martin has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{iv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Lockheed Martin in human rights violations. Therefore, under the UN Guiding Principles, Lockheed Martin must conduct human rights due diligence to prevent or mitigate those violations.^v

Lockheed Martin's own policies recognize and support the UN Guiding Principles, and commit Lockheed Martin to conduct human rights due diligence. Lockheed Martin's policy states:

"We will report periodically on our progress in upholding this policy and assess regularly whether changes are needed to ensure that we keep our commitment to good corporate citizenship and respect for human rights."

(See Lockheed Martin's full policy at <http://www.lockheedmartin.com/content/dam/lockheed/data/corporate/documents/ethics/cps-021.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Lockheed

Martin's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Lockheed Martin is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Lockheed Martin's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

"We appreciate the opportunity, but are going to decline the offer."

Northrop Grumman

Dear Ms. Beste,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Northrop Grumman's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{vi} which is primarily implemented by DHS, violated International Human Rights.^{vii} We asked if Northrop Grumman had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{viii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Northrop Grumman has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Northrop Grumman in human rights violations. Therefore, under the UN Guiding Principles, Northrop Grumman must conduct human rights due diligence to prevent or mitigate those violations.^x

Northrop Grumman's own policies recognize and support the UN Guiding Principles, and commit Northrop Grumman to conduct human rights due diligence. Northrop Grumman's policy states:

"Company policies, practices and procedures reflect a strong commitment to human rights as set forth in the Universal Declaration on Human Rights. This commitment extends beyond the work environment to the global communities where we live, work and serve."

(See Northrop Grumman's full policy at www.northropgrumman.com/CorporateResponsibility/Pages/HumanRightsPolicy.aspx)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Northrop Grumman's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Northrop Grumman is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Northrop Grumman's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team
cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

A different employee responded to the phone call, asking to be forwarded the letter sent to a higher ranking employee. The employee was not responsive to the researcher's questions.

GEO Group

Dear Mr. Paez,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding GEO Group's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xi} which is primarily implemented by DHS, violated International Human Rights.^{xii} We asked if GEO Group had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

GEO Group has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{xiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate GEO Group in human rights violations. Therefore, under the UN Guiding Principles, GEO Group must conduct human rights due diligence to prevent or mitigate those violations.^{xv}

GEO Group's own policies recognize and support the UN Guiding Principles, and commit GEO Group to conduct human rights due diligence. GEO Group's policy states:

"GEO's implementation of its commitment to respect human rights is a process that requires ongoing assessment of its efforts, and continuous improvement."

(See GEO Group's full policy at

<http://www.GEOgroup.com/Portals/0/SR/Human%20Rights/Human%20Rights%20Policy.pdf>
", "<http://www.GEOgroup.com/Portals/0/SR/Human%20Rights/Human%20Rights%20Policy.pdf>")

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers GEO Group's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how GEO Group is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it GEO Group's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside

expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

“Thank you for your email. While there has been some inaccurate speculation regarding our company’s involvement in immigration and border enforcement policies and the separation of families, GEO in fact has no involvement, and has never had any involvement, in any way with the policies in question. Our company does not and has never managed facilities that house unaccompanied minors nor has our company ever provided transportation or any other services for that purpose. Furthermore, GEO does not take a position on nor have we ever advocated for or against immigration enforcement or detention policies.

For three decades, our company has managed ICE Processing Centers providing services for adults in the care of federal immigration authorities in partnership with both Democrat and Republican Administrations, and since 2014, we have managed the Karnes Family Residential Center, which has cared exclusively for mothers together with their children.

The Karnes Family Residential Center was established by the Obama Administration. The facilities, programs and services at the Karnes Family Residential Center are specifically developed to provide a safe and humane environment for those in our care. This includes educational programming, around-the-clock quality medical care, a range of recreational options, and visitation facilities. Following intake, all residents are provided with six sets of non-institutional clothing and receive a medical examination.

All residents of school age are offered educational services through a certified charter school. Other features at the Karnes Center include state-of-the-art smart-boards for classroom instruction, a library, activity games, multipurpose rooms for social activities, laundry facilities and food services catered to the residents’ local cuisine. Unlimited access to fruit, snacks, drinks and infant formula is provided at all times. Recreational options at the Karnes Center include an indoor gymnasium, artificial turf soccer field, covered pavilion playground

and picnic areas. Each room is equipped with bathroom and shower facilities, individual TVs and microwaves.

We strongly dispute allegations related to the care provided at the ICE Processing Centers we manage. On a daily basis, our dedicated employees deliver high quality services, including around-the-clock medical care, that comply with performance-based standards set by the federal government and adhere to guidelines set by leading third-party accreditation agencies. Our employees are proud of our record in managing ICE Processing Centers with high-quality, culturally responsive services in safe, secure, and humane environments. Members of our team strive to treat all of those entrusted to our care with compassion, dignity and respect.

As a three-decade long service provider to the federal government, our focus has always been and remains on providing high quality services that meet or exceed the strict standards set by the federal government, and we have never advocated for or against immigration enforcement or detention policies.

A report issued by the Department of Homeland Security, Office of Inspector General detailing the positive findings of unannounced spot inspections of family residential centers, including the Karnes Center, that were conducted by the Obama Administration in July 2016, can be found here: <https://www.oig.dhs.gov/sites/default/files/assets/2017/OIG-17-65-Jun17.pdf>

Sincerely,
Pablo E. Paez”

L3

Dear Mr. Hamilton,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding L3’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{xvi} which is primarily implemented by DHS, violated International Human Rights.^{xvii} We asked if L3 had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms.

Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

L3 has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xix} Actions assisting DHS Actions, such as the four mentioned above, may implicate L3 in human rights violations. Therefore, under the UN Guiding Principles, L3 must conduct human rights due diligence to prevent or mitigate those violations.^{xx}

L3’s own policies recognize and support the UN Guiding Principles, and commit L3 to conduct human rights due diligence. L3’s policy states:

"L-3 complies with all applicable laws and regulations, respects human rights, provides fair working conditions, and prohibits the use of any forced, compulsory, or child labor."

(See L3’s full policy at http://www.l-3com.com/sites/default/files/code-of-ethics/english/l-3_code_of_ethics_and_business_conduct.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers L3’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how L3 is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it L3’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

“As a prime contractor of specialized work across a number of U.S. government agencies, L3 is committed to upholding its Code of Ethics and Business Conduct and complies with all applicable laws, regulations and treaties to protect human rights wherever it operates. Please refer to L3’s [Code of Ethics and Business Conduct](#) policy for more information. Please feel free to contact me with future inquiries regarding L3.”

CACI

Dear Ms. Brown,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding CACI Federal’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{xxi} which is primarily implemented by DHS, violated International Human Rights.^{xxii} We asked if CACI Federal had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

CACI Federal has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate CACI Federal in human rights violations. Therefore, under the UN Guiding Principles, CACI Federal must conduct human rights due diligence to prevent or mitigate those violations.^{xxv}

CACI Federal’s own policies recognize and support the UN Guiding Principles, and commit CACI Federal to conduct human rights due diligence. As a UN Global Compact Lead Member, CACI Federal’s policy states:

"We support and defend the Constitution, and comply with the laws of the United States, ensuring that we carry out our mission in a manner that respects privacy, civil liberties and human rights obligations"

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers CACI Federal’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how CACI Federal is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it CACI Federal’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

“Ms. Miller,

CACI respects human rights. CACI does not condone or participate in human rights violations. Nor does CACI make public pronouncements or respond to questions regarding its clients or other Government agencies, including for the agenda of organizations such as NomoGaia – which appears to have prejudged CACI in any event.

CACI provides solutions and services to our customers in support of national security. The Company maintains a strong culture of ethics and integrity, and takes pride in making our country better and safer.

Jody Brown”

Leidos

Dear Ms. Koskovich,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Leidos’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{xxvi} which is primarily implemented by DHS, violated International Human Rights.^{xxvii} We asked if Leidos had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Leidos has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Leidos in human rights violations. Therefore, under the UN Guiding Principles, Leidos must conduct human rights due diligence to prevent or mitigate those violations.^{xxx}

Leidos’s own policies recognize and support the UN Guiding Principles, and commit Leidos to conduct human rights due diligence. Leidos’s policy states:

“Wherever we do business, we are committed to upholding the core values embodied in this Code, which are influenced by, and reflect a respect for, human dignity and fundamental human rights. Leidos has implemented policies and practices, from which the concepts in this Code are generally derived, that support our commitment to protect and advance human dignity and human rights in our business practices.”

(<https://www.leidos.com/sites/default/files/responsive/code-of-conduct/CodeOfConduct.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Leidos’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Leidos is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Leidos’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team
cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

“Leidos is a mission partner to the Department of Homeland Security providing information technology services, cyber security, baggage and vehicle screening solutions as well as disaster response training. We are committed to ensuring that our customers, including DHS, benefit from the latest technologies and innovative service delivery to achieve their critical missions.”

Grant Thornton

Dear Mr. Rucket,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Grant Thornton’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{xxx} which is primarily implemented by DHS, violated International Human Rights.^{xxxii} We asked if Grant Thornton had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xxxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Grant Thornton has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{xxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Grant Thornton in human rights violations. Therefore, under the UN Guiding Principles, Grant Thornton must conduct human rights due diligence to prevent or mitigate those violations.^{xxxv}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Grant Thornton's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Grant Thornton is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Grant Thornton's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team
cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

"Professional standards prevent us from commenting on specific client engagements."

CHSi

Dear Ms. Smith,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Comprehensive Health Services' (CHSi) work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xxxvi} which is primarily implemented by DHS, violated International Human Rights.^{xxxvii} We asked if CHSi had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

CHSi has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{xxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate CHSi in human rights violations. Therefore, under the UN Guiding Principles, CHSi must conduct human rights due diligence to prevent or mitigate those violations.^{xl}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers CHSi's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how CHSi is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it CHSi's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

Employee hung up in the middle of the researchers conversation.

Dear Ms. LaBumbard,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding PAE's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xli} which is primarily implemented by DHS, violated International Human Rights.^{xlii} We asked if PAE had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xliii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

PAE has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xliv} Actions assisting DHS Actions, such as the four mentioned above, may implicate PAE in human rights violations. Therefore, under the UN Guiding Principles, PAE must conduct human rights due diligence to prevent or mitigate those violations.^{xlv}

PAE’s own policies recognize and support the UN Guiding Principles, and commit PAE to conduct human rights due diligence. PAE’s policy states:
“UNGC Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights • Make sure that they are not complicit in human rights abuses”

(See PAE’s full policy at <https://www.pae.com/sites/default/files/2015%20COP%20-%20Final.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers PAE’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how PAE is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it PAE’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

Referred inquiry, but no substantive response

General Dynamics IT

Dear Mr. Maz,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding General Dynamics Information Technology's (GDIT) work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xlvi} which is primarily implemented by DHS, violated International Human Rights.^{xlvi} We asked if GDIT had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xlvi}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

GDIT has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{xlvi} Actions assisting DHS Actions, such as the four mentioned above, may implicate GDIT in human rights violations. Therefore, under the UN Guiding Principles, GDIT must conduct human rights due diligence to prevent or mitigate those violations.¹

GDIT's own policies recognize and support the UN Guiding Principles, and commit GDIT to conduct human rights due diligence. GDIT's policy states:

“General Dynamics is vigilant in preventing human rights violations. This is reflected in our corporation’s ethos—with our commitment to respecting the dignity, rights and autonomy of others—and reinforced through employment, ethics and procurement policies designed to ensure protection against human rights abuses, including human trafficking.”

(See GDIT’s full policy at <https://gdit.com/globalassets/gdit/pdf/partnerships/doing-business-with-gdit.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers GDIT’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how GDIT is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it GDIT’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response, but referred to another employee

Dear Mr. Brody,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Accenture's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{li} which is primarily implemented by DHS, violated International Human Rights.^{lii} We asked if Accenture had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{liii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Accenture has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{liv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Accenture in human rights violations. Therefore, under the UN Guiding Principles, Accenture must conduct human rights due diligence to prevent or mitigate those violations.^{lv}

Accenture's own policies recognize and support the UN Guiding Principles, and commit Accenture to conduct human rights due diligence. As a UN Global Compact Lead Member, Accenture's policy states:

"We support and respect human rights throughout our operations as reflected by our longstanding commitment to the Ten Principles of the UN Global Compact"

(See Accenture's full policy at www.accenture.com/t20160908T034244_w_us-en/acnmedia/Accenture/next-gen/corporate-citizenship-report/documents/Accenture-2015-Corporate-Citizenship-Report.pdf#zoom=50)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Accenture's

standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Accenture is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Accenture's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

AT&T

Dear Ms. Homer,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding AT&T's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lvi} which is primarily implemented by DHS, violated International Human Rights.^{lvii} We asked if AT&T had operationalized its human rights policy to ensure that it was not at risk of contributing to

potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

AT&T has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{lix} Actions assisting DHS Actions, such as the four mentioned above, may implicate AT&T in human rights violations. Therefore, under the UN Guiding Principles, AT&T must conduct human rights due diligence to prevent or mitigate those violations.^{lx}

AT&T's own policies recognize and support the UN Guiding Principles, and commit AT&T to conduct human rights due diligence. AT&T's policy states:

"We are committed to respect basic human rights"

(See AT&T's full policy at

http://about.att.com/content/dam/csr/FAQpdfs/Human_Rights_Communications_Policy.pdf
)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers AT&T's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how AT&T is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it AT&T's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside

expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

BAE

Dear Ms. Allen,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding BAE Systems Intelligence & Security's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxi} which is primarily implemented by DHS, violated International Human Rights.^{lxii} We asked if BAE Systems Intelligence & Security & Intelligence had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

BAE Systems Intelligence & Security has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{lxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate BAE Systems Intelligence & Security in human rights violations. Therefore, under the UN Guiding Principles, BAE Systems Intelligence & Security must conduct human rights due diligence to prevent or mitigate those violations.^{lxv}

BAE Systems Intelligence & Security’s own policies recognize and support the UN Guiding Principles, and commit BAE Systems Intelligence & Security to conduct human rights due diligence. BAE Systems Intelligence & Security’s policy states:

"Our company is committed to respect human rights wherever we operate, within our sphere of influence."

(See BAE Systems Intelligence & Security’s full policy at <http://www.baesystems.com/en-us/our-company/corporate-responsibility/working-responsibly/how-our-business-works/human-rights>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers BAE Systems Intelligence & Security’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how BAE Systems Intelligence & Security is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it BAE Systems Intelligence & Security’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Battelle

Dear Mr. Jarvis,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Battelle's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxvi} which is primarily implemented by DHS, violated International Human Rights.^{lxvii} We asked if Battelle had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Battelle has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{lxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Battelle in human rights violations. Therefore, under the UN Guiding Principles, Battelle must conduct human rights due diligence to prevent or mitigate those violations.^{lxx}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Battelle's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Battelle is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Battelle's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Boeing

Dear Mr. Capeheart,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Boeing's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxxi} which is primarily implemented by DHS, violated International Human Rights.^{lxxii} We asked if Boeing had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Boeing has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{lxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Boeing in human rights violations. Therefore, under the UN Guiding Principles, Boeing must conduct human rights due diligence to prevent or mitigate those violations.^{lxxv}

Boeing's own policies recognize and support the UN Guiding Principles, and commit Boeing to conduct human rights due diligence. Boeing's policy states:

"Boeing is committed to the protection and advancement of human rights in its worldwide operations"

(See Boeing's full policy at <http://www.boeing.com/principles/human-rights.page>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Boeing's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Boeing is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Boeing's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Booz Allen Hamilton

Dear Ms. West,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Booz Allen Hamilton's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxxvi} which is primarily implemented by DHS, violated International Human Rights.^{lxxvii} We asked if Booz Allen Hamilton had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Booz Allen Hamilton has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{lxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Booz Allen Hamilton in human rights violations. Therefore, under the UN Guiding Principles, Booz Allen Hamilton must conduct human rights due diligence to prevent or mitigate those violations.^{lxxx}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Booz Allen Hamilton’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Booz Allen Hamilton is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Booz Allen Hamilton’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Dell

Dear Ms. Tatum,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Dell's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxxxix} which is primarily implemented by DHS, violated International Human Rights.^{lxxxii} We asked if Dell had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxxxiii} These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Dell has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{lxxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Dell in human rights violations. Therefore, under the UN Guiding Principles, Dell must conduct human rights due diligence to prevent or mitigate those violations.^{lxxxv}

Dell's own policies recognize and support the UN Guiding Principles, and commit Dell to conduct human rights due diligence. Dell's policy states:

"We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same high standard. Dell supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses."

(See Dell's full policy at <http://www.dell.com/learn/us/en/vn/corp-comm/cr-report-human-rights-labor-policy>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Dell's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Dell is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Dell's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Deloitte

Dear Mr. Helfrich,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Deloitte Services' (Deloitte)

work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{lxxxvi} which is primarily implemented by DHS, violated International Human Rights.^{lxxxvii} We asked if Deloitte had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{lxxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Deloitte has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{lxxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Deloitte in human rights violations. Therefore, under the UN Guiding Principles, Deloitte must conduct human rights due diligence to prevent or mitigate those violations.^{xc}

Deloitte's own policies recognize and support the UN Guiding Principles, and commit Deloitte to conduct human rights due diligence. Deloitte's policy states:

"We support efforts to drive sustainable development and we respect human rights standards."

(See Deloitte's full policy at <https://www2.deloitte.com/content/dam/Deloitte/global/Documents/About-Deloitte/gx-deloitte-global-principles-of-business-conduct-2016.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Deloitte's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Deloitte is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Deloitte's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Ernst & Young

Dear Ms. Major,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Ernst & Young's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xcii} which is primarily implemented by DHS, violated International Human Rights.^{xcii} We asked if Ernst & Young had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xciii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Ernst & Young has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xciv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Ernst & Young in human rights violations. Therefore, under the UN Guiding Principles, Ernst & Young must conduct human rights due diligence to prevent or mitigate those violations.^{xcv}

Ernst & Young’s own policies recognize and support the UN Guiding Principles, and commit Ernst & Young to conduct human rights due diligence. Ernst & Young’s policy states:

“Businesses should support and respect the protection of internationally proclaimed human rights • Make sure that they are not complicit in human rights abuses”

(See Ernst & Young’s full policy at [https://www.ey.com/Publication/vwLUAssets/United_Nations_Global_Compact_2015/\\$FILE/UNGC_Communication_on_Progress_2015.pdf](https://www.ey.com/Publication/vwLUAssets/United_Nations_Global_Compact_2015/$FILE/UNGC_Communication_on_Progress_2015.pdf))

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Ernst & Young’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Ernst & Young is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Ernst & Young’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside

expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

FedEx

Dear Ms. Noe,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding FedEx's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{xcvi} which is primarily implemented by DHS, violated International Human Rights.^{xcvii} We asked if FedEx had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{xcviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

FedEx has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{xcix} Actions assisting DHS Actions, such as the four mentioned above, may implicate FedEx in human rights violations. Therefore, under the UN Guiding Principles, FedEx must conduct human rights due diligence to prevent or mitigate FedEx violations.^c

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers FedEx’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how FedEx is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it FedEx’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 7, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

G4S

Dear Mr. Hogsten,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding G4S Government Solutions' (G4S) work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ci} which is primarily implemented by DHS, violated International Human Rights.^{cii} We asked if G4S had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ciii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

G4S has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{civ} Actions assisting DHS Actions, such as the four mentioned above, may implicate G4S in human rights violations. Therefore, under the UN Guiding Principles, G4S must conduct human rights due diligence to prevent or mitigate those violations.^{cv}

G4S's own policies recognize and support the UN Guiding Principles, and commit G4S to conduct human rights due diligence. G4S's policy states:

"G4S is committed to fulfilling its responsibilities on human rights in all of its companies around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011) across all of our businesses"

(See G4S's full policy at <http://www.au.g4s.com/media/1580/g4s-human-rights-policy.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers G4S's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how G4S is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it G4S's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Herman Miller

Dear Ms. Oliver,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Herman Miller's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cv} which is primarily implemented by DHS, violated International Human Rights.^{cvi} We asked if Herman Miller had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cviii} These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Herman Miller has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{cix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Herman Miller in human rights violations. Therefore, under the UN Guiding Principles, Herman Miller must conduct human rights due diligence to prevent or mitigate those violations.^{cx}

Herman Miller’s own policies recognize and support the UN Guiding Principles, and commit Herman Miller to conduct human rights due diligence. Herman Miller’s policy states: “All employees are required to... adhere to international human rights conventions” (See Herman Miller’s full policy at <http://www.hermanmiller.com/about-us/who-is-herman-miller/legal/corporate-code-of-conduct.html>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Herman Miller’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Herman Miller is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Herman Miller’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Hilton

Dear Ms. Raven,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Hilton's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxⁱ} which is primarily implemented by DHS, violated International Human Rights.^{cxⁱⁱ} We asked if Hilton had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxⁱⁱⁱ}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Hilton has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cx^{iv}} Actions assisting DHS Actions, such as the four mentioned above, may implicate Hilton in human rights violations. Therefore, under the UN Guiding Principles, Hilton must conduct human rights due diligence to prevent or mitigate those violations.^{cx^v}

Hilton's own policies recognize and support the UN Guiding Principles, and commit Hilton to conduct human rights due diligence. Hilton's policy states:

"We respect and support fundamental human rights for all people, and we are never complicit in human rights abuses."

(See Hilton's full policy at <http://ir.hilton.com/~media/Files/H/Hilton-Worldwide-IR-V3/committee-composition/HW-Code-Of-Conduct-OCT2015-L26.pdf>.)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Hilton's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Hilton is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Hilton's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Holiday Inn

Dear Ms. Bird,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding IHG's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxvi} which is primarily implemented by DHS, violated International Human Rights.^{cxvii} We asked if IHG had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

IHG has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate IHG in human rights violations. Therefore, under the UN Guiding Principles, IHG must conduct human rights due diligence to prevent or mitigate those violations.^{cxx}

IHG's own policies recognize and support the UN Guiding Principles, and commit IHG to conduct human rights due diligence. IHG's policy states:

"We support and protect human rights wherever we can. As a responsible company with operations in nearly 100 countries and territories, we believe that strong ethics and good business go hand in hand and we are committed to complying with the laws and regulations of the countries and jurisdictions in which we operate."

(See IHG's full policy at <https://www.ihgplc.com/responsible-business/our-culture-of-responsible-business/human-right>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers IHG's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how IHG is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it IHG's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

HP

Dear Ms. Holderness,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding HP Enterprise Services' (HP) work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxix} which is primarily implemented by DHS, violated International Human Rights.^{cxix} We asked if HP had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxix}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

HP has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate HP in human rights violations. Therefore, under the UN Guiding Principles, HP must conduct human rights due diligence to prevent or mitigate those violations.^{cxix}

HP's own policies recognize and support the UN Guiding Principles, and commit HP to conduct human rights due diligence. HP's policy states:

"Our approach aligns with the UN Guiding Principles on Business and Human Rights and HP is a signatory to the UN Global Compact."

(See HP's full policy at <http://www8.hp.com/us/en/hp-information/global-citizenship/society/humanrights.html>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers HP's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how HP is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it HP's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Hyatt

Dear Ms. Sheppard,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Hyatt’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{xxxvi} which is primarily implemented by DHS, violated International Human Rights.^{xxxvii} We asked if Hyatt had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms.

Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Hyatt has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{cxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Hyatt in human rights violations. Therefore, under the UN Guiding Principles, Hyatt must conduct human rights due diligence to prevent or mitigate those violations.^{cxxx}

Hyatt’s own policies recognize and support the UN Guiding Principles, and commit Hyatt to conduct human rights due diligence. Hyatt’s policy states:

“In keeping with this mission, we respect fundamental human rights, as embodied in the Universal Declaration of Human Rights. We believe that we have a responsibility to manage our business in a manner that is consistent with fundamental human rights and we attempt to foster similar ideals in those with whom we do business.”

(See Hyatt’s full policy at

http://s2.q4cdn.com/278413729/files/doc_downloads/corp%20gov/HumanRightsStatement.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Hyatt’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Hyatt is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Hyatt’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

LexisNexis

Dear Ms. Johnson,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding LexisNexis's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxixi} which is primarily implemented by DHS, violated International Human Rights.^{cxixii} We asked if LexisNexis had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxixiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

LexisNexis has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{CXXXIV} Actions assisting DHS Actions, such as the four mentioned above, may implicate LexisNexis in human rights violations. Therefore, under the UN Guiding Principles, LexisNexis must conduct human rights due diligence to prevent or mitigate those violations.^{CXXXV}

LexisNexis’s own policies recognize and support the UN Guiding Principles, and commit LexisNexis to conduct human rights due diligence. LexisNexis’s policy states:

"Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and Principle 2: make sure that they are not complicit in human rights abuses."

(See LexisNexis’s full policy at

<http://www.relx.com/corporateresponsibility/UNGlobalCompact/AboutUNGC/Pages/Home.aspx>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers LexisNexis’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how LexisNexis is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it LexisNexis’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Lexmark

Dear Ms. Rardin,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Lexmark's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxxxvi} which is primarily implemented by DHS, violated International Human Rights.^{cxxxvii} We asked if Lexmark had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Lexmark has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Lexmark in human rights violations. Therefore, under the UN Guiding Principles, Lexmark must conduct human rights due diligence to prevent or mitigate those violations.^{cxl}

Lexmark's own policies recognize and support the UN Guiding Principles, and commit Lexmark to conduct human rights due diligence. Lexmark's policy states:

"Lexmark upholds and respects international human rights standards as reflected in The Universal Declaration of Human Rights, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO) and the Organization for Economic Co-operation and Development for Multinational Enterprises (OECD). Our support for these standards/principles is embedded in our Code of Business Conduct, our position on labor relations and our employment practices. All of our business operations as well as partner and supplier relationships are guided by these principles. We inspect for compliance through our management processes including operations reviews, risk management and internal audit"

(See Lexmark's full policy at <http://csr.lexmark.com/policy-human-rights.html>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Lexmark's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Lexmark is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Lexmark's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

IBM

Dear Mr. Pratt,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding IBM's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxli} which is primarily implemented by DHS, violated International Human Rights.^{cxlii} We asked if IBM had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxliii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

IBM has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxliv} Actions assisting DHS Actions, such as the four mentioned above, may implicate IBM in human rights violations. Therefore, under the UN Guiding Principles, IBM must conduct human rights due diligence to prevent or mitigate those violations.^{cxlv}

IBM's own policies recognize and support the UN Guiding Principles, and commit IBM to conduct human rights due diligence. IBM's policy states:

"Underpinning our corporate responsibility standards and practices is our dedication to respect human rights. IBM's stance on human rights is informed by international standards, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights."

(See IBM's full policy at

https://www.ibm.com/ibm/responsibility/ibm_humanrightsprinciples.html)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers IBM's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how IBM is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it IBM's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

ManTech International

Dear Ms. Davis,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Mantech International's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxlvi} which is primarily implemented by DHS, violated International Human Rights.^{cxlvii} We asked if Mantech International had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxlviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Mantech International has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxlix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Mantech International in human rights violations. Therefore, under the UN Guiding Principles, Mantech International must conduct human rights due diligence to prevent or mitigate those violations.^{cl}

Mantech International's own policies recognize and support the UN Guiding Principles, and commit Mantech International to conduct human rights due diligence. Mantech International's policy states:

"Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations."

(See Mantech International's full policy at <http://www.mantech.com/Documents/ManTech%20Supplier%20Code%20of%20Conduct.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Mantech International's standing with the public. Companies connected with human rights abuses

jeopardize their brand and reputation. In seeking to understand how Mantech International is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Mantech International's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Microsoft

Dear Mr. Smith,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Microsoft's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cli} which is primarily implemented by DHS, violated International Human Rights.^{clii} We asked if Microsoft had operationalized its human rights policy to ensure that it was not at risk of contributing to

potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cliii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Microsoft has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cliv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Microsoft in human rights violations. Therefore, under the UN Guiding Principles, Microsoft must conduct human rights due diligence to prevent or mitigate those violations.^{clv}

Microsoft's own policies recognize and support the UN Guiding Principles, and commit Microsoft to conduct human rights due diligence. Microsoft's policy states:

"Our Global Human Rights Statement is itself grounded in the United Nations Guiding Principles on Business and Human Rights, which establishes that in their work to respect human rights, companies "should avoid infringing on the rights of others and should address adverse human rights impacts with which they are involved." This is now a global standard of conduct expected of all businesses."

(See Microsoft's full policy at <https://www.microsoft.com/en-us/about/corporate-responsibility/human-rights>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Microsoft's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Microsoft is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Microsoft's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Morpho Detections

Dear Ms. De Buyer,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Morpho Detections’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{clvi} which is primarily implemented by DHS, violated International Human Rights.^{clvii} We asked if Morpho Detections had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms.

Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Morpho Detections has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{clix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Morpho Detections in human rights violations. Therefore, under the UN Guiding Principles, Morpho Detections must conduct human rights due diligence to prevent or mitigate those violations.^{clx}

Morpho Detections’s own policies recognize and support the UN Guiding Principles, and commit Morpho Detections to conduct human rights due diligence. Morpho Detections’s policy states:

"Safran defends the principles of the United Nations Global Compact concerning human rights, labor, environment and the fight against corruption."

(See Morpho Detections’s full policy at [http://www.Morpho Detections-group.com/commitments/our-ethical-principles/trade-compliance/united-nations-global-compact-0](http://www.MorphoDetections-group.com/commitments/our-ethical-principles/trade-compliance/united-nations-global-compact-0))

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Morpho Detections’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Morpho Detections is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Morpho Detections’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside

expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Motorola

Dear Ms. Dyer,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Motorola Solutions' work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order, which is primarily implemented by DHS, violated International Human Rights. We asked if Motorola Solutions had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions, and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Motorola Solutions has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”). Actions assisting DHS Actions, such as the four mentioned above, may implicate Motorola Solutions in human rights violations. Therefore, under the UN Guiding Principles, Motorola Solutions must conduct human rights due diligence to prevent or mitigate those violations.

Motorola Solutions’ own policies recognize and support the UN Guiding Principles, and commit Motorola Solutions to conduct human rights due diligence. Motorola Solutions’ policy states:

"Our Corporate Responsibility Business Principles are supported by our Corporate Responsibility Policy, Code of Business Conduct, our Environment, Health and Safety and Human Rights policies, and our Supplier Code of Conduct."

(See Motorola Solutions’ full policy at https://www.motorolasolutions.com/en_us/about/company-overview/corporate-responsibility/governance-and-policies/human-rights-policy.html)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Motorola Solutions’ standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Motorola Solutions is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Motorola Solutions’ position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results, and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018, and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3,

2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Nestle

Dear Ms. Caseli Mechael,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Nestle's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{clxi} which is primarily implemented by DHS, violated International Human Rights.^{clxii} We asked if Nestle had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Nestle has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{clxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Nestle in human rights violations. Therefore, under the UN Guiding Principles, Nestle must conduct human rights due diligence to prevent or mitigate those violations.^{clxv}

Nestle's own policies recognize and support the UN Guiding Principles, and commit Nestle to conduct human rights due diligence. Nestle's policy states:

"By upholding international human rights standards, and continuous and consistent application of our own policies, which are aligned with the UN Guiding Principles on Business and Human Rights, Nestlé can make a positive impact on all our stakeholders."

(See Nestle's full policy at www.nestle.com/csv/human-rights-compliance/human-rights)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Nestle's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Nestle is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Nestle's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Palantir

Dear Mr. Long,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Palantir's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{clxvi} which is primarily implemented by DHS, violated International Human Rights.^{clxvii} We asked if Palantir had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Palantir has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{clxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Palantir in human rights violations. Therefore, under the UN Guiding Principles, Palantir must conduct human rights due diligence to prevent or mitigate those violations.^{clxx}

Palantir's own policies recognize and support the UN Guiding Principles, and commit Palantir to conduct human rights due diligence. Palantir's policy states:

"Our team is dedicated to working for the common good and doing what's right

(See Palantir's full policy at <https://www.palantir.com/pcl/>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Palantir's standing with the public. Companies connected with human rights abuses jeopardize their

brand and reputation. In seeking to understand how Palantir is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Palantir's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 7, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

PwC

Dear Mr. Braude,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding PwC's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{clxxi} which is primarily implemented by DHS, violated International Human Rights.^{clxxii} We asked if PwC had operationalized its human rights policy to ensure that it was not at risk of contributing to

potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

PWC has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{clxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate PWC in human rights violations. Therefore, under the UN Guiding Principles, PWC must conduct human rights due diligence to prevent or mitigate those violations.^{clxxv}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers PWC's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how PWC is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it PWC's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Radisson

Dear Ms. Thompson,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Radisson's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{clxxvi} which is primarily implemented by DHS, violated International Human Rights.^{clxxvii} We asked if Radisson had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Radisson has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{clxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Radisson in human rights violations. Therefore, under the UN Guiding Principles, Radisson Hotel must conduct human rights due diligence to prevent or mitigate those violations.^{clxxx}

Radisson's own policies recognize and support the UN Guiding Principles, and commit Radisson to conduct human rights due diligence. Radisson's policy states:

"Respectful of human rights, socially equitable and environmentally sustainable, Radisson works to meet social and economic responsibility."

(See Radisson's full policy at <https://www.ihopmexico.com/e-marketing/radisson/7053/files/assets/common/downloads/page0006.pdf>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Radisson's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Radisson is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Radisson's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Red River

Dear Ms. Singh,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Red River's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{clxxxi} which is primarily implemented by DHS, violated International Human Rights.^{clxxxii} We asked if Red River had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxxxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Red River has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{clxxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Red River in human rights violations. Therefore, under the UN Guiding Principles, Red River must conduct human rights due diligence to prevent or mitigate those violations.^{clxxxv}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Red River's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Red River is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Red River's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Raytheon

Dear Mr. Doble,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Raytheon’s work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump’s “Travel Ban” Executive Order,^{clxxxvi} which is primarily implemented by DHS, violated International Human Rights.^{clxxxvii} We asked if Raytheon had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS’s policies, procedures, actions and directives (collectively “DHS Actions”).

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms.

Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{clxxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Raytheon has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{clxxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Raytheon in human rights violations. Therefore, under the UN Guiding Principles, Raytheon must conduct human rights due diligence to prevent or mitigate those violations.^{cxc}

Raytheon’s own policies recognize and support the UN Guiding Principles, and commit Raytheon to conduct human rights due diligence. Raytheon’s policy states:

"Ethics and Conduct to underscore our commitment to protection of human rights in our global business activities" and separately, "around the world, we spread awareness among employees and suppliers of potential human rights issues that may arise in some locations"

(See Raytheon’s full policy at www.raytheon.com/rtnwcm/groups/public/documents/content/CA_transparency_supply_chain.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Raytheon’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Raytheon is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Raytheon’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Ricoh Corporation

Dear Mr. Greco,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Ricoh Corporation's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxci} which is primarily implemented by DHS, violated International Human Rights.^{cxcii} We asked if Ricoh Corporation had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Ricoh Corporation has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxiv}

Actions assisting DHS Actions, such as the four mentioned above, may implicate Ricoh Corporation in human rights violations. Therefore, under the UN Guiding Principles, Ricoh Corporation must conduct human rights due diligence to prevent or mitigate those violations.^{CXCV}

Ricoh Corporation's own policies recognize and support the UN Guiding Principles, and commit Ricoh Corporation to conduct human rights due diligence. Ricoh Corporation's policy states:

"we recognize respect for human rights as the basis of our social responsibility and will continue to fulfill our duties to protect and promote human rights"

(See Ricoh Corporation's full policy at www.ricoh.com/csr/human_rights/)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Ricoh Corporation's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Ricoh Corporation is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Ricoh Corporation's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

SAIC

Dear Ms. Presti,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding SAIC's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cxcvi} which is primarily implemented by DHS, violated International Human Rights.^{cxcvii} We asked if SAIC had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cxcviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

SAIC has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cxcix} Actions assisting DHS Actions, such as the four mentioned above, may implicate SAIC in human rights violations. Therefore, under the UN Guiding Principles, SAIC must conduct human rights due diligence to prevent or mitigate those violations.^{cc}

SAIC's own policies recognize and support the UN Guiding Principles, and commit SAIC to conduct human rights due diligence. SAIC's policy states:

"SAIC recognizes that we have a corporate responsibility to respect human rights in the operation of our business."

(See SAIC's full policy at

http://investors.saic.com/sites/saic.investorhq.businesswire.com/files/doc_library/file/Code_of_Conduct_Oct2016.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers SAIC's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how SAIC is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it SAIC's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Sentrillion

Dear Mr. Daley,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Sentrillion's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{cci} which is primarily implemented by DHS, violated International Human Rights.^{ccii} We asked if Sentrillion had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{cciii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Sentrillion has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{cciv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Sentrillion in human rights violations. Therefore, under the UN Guiding Principles, Sentrillion must conduct human rights due diligence to prevent or mitigate those violations.^{ccv}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Sentrillion's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Sentrillion is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Sentrillion's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside

expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Sharp Electronics

Dear Mr. Yasuki,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Sharp Electronics's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccvi} which is primarily implemented by DHS, violated International Human Rights.^{ccvii} We asked if Sharp Electronics had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Sharp Electronics has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{ccix} Actions assisting DHS Actions, such as the four mentioned above, may implicate Sharp Electronics in human rights violations. Therefore, under the UN Guiding Principles, Sharp Electronics must conduct human rights due diligence to prevent or mitigate those violations.^{ccx}

Sharp Electronics’s own policies recognize and support the UN Guiding Principles, and commit Sharp Electronics to conduct human rights due diligence. Sharp Electronics’s policy states:

"The Sharp Group respects fundamental human rights"

(See Sharp Electronics’s full policy at http://www.sharp-world.com/corporate/eco/ssr/hr/human_rights/approach/)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Sharp Electronics’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Sharp Electronics is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Sharp Electronics’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Sprint

Dear Mr. Michelman,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Sprint's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxi} which is primarily implemented by DHS, violated International Human Rights.^{ccxii} We asked if Sprint had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Sprint has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Sprint in human rights violations. Therefore, under the UN Guiding Principles, Sprint must conduct human rights due diligence to prevent or mitigate those violations.^{ccxv}

Sprint's own policies recognize and support the UN Guiding Principles, and commit Sprint to conduct human rights due diligence. Sprint's policy states:

"As a leading global communications company, Sprint is committed to conducting business with integrity and complying responsibly with all applicable laws. We acknowledge and respect the broad principles aimed at promoting and protecting human rights as outlined in the Universal Declaration of Human Rights. We seek practical ways of applying these principles by focusing on our customers, enriching the workplace, engaging our suppliers, and strengthening the communities in which we do business."

(See Sprint's full policy at goodworks.sprint.com/file_download.cfm?section_id=85)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Sprint's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Sprint is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Sprint's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

T-Mobile

Dear Ms. Kapner,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding T-Mobile's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxvi} which is primarily implemented by DHS, violated International Human Rights.^{ccxvii} We asked if T-Mobile had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

T-Mobile has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate T-Mobile in human rights violations. Therefore, under the UN Guiding Principles, T-Mobile must conduct human rights due diligence to prevent or mitigate those violations.^{ccxx}

T-Mobile's own policies recognize and support the UN Guiding Principles, and commit T-Mobile to conduct human rights due diligence as T-Mobile continues to state it is the "world's most ethical company."

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers T-Mobile's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how T-Mobile is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it T-Mobile's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,

Mallory Miller

Miller@nomogaia.org

NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

UNISYS

Dear Mr. Daly,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding UNISYS's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxxi} which is primarily implemented by DHS, violated International Human Rights.^{ccxxii} We asked if UNISYS had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law. ^{ccxxiii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

UNISYS has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”). ^{ccxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate UNISYS in human rights violations. Therefore, under the UN Guiding Principles, UNISYS must conduct human rights due diligence to prevent or mitigate those violations. ^{ccxxv}

UNISYS’s own policies recognize and support the UN Guiding Principles, and commit UNISYS to conduct human rights due diligence. UNISYS’s policy states:

"Basic human rights should always be respected."

(See UNISYS’s full policy at http://assets.unisys.com/Documents/Global/Misc/Code_of_Ethics.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers UNISYS’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how UNISYS is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it UNISYS’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and

3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

UPS

Dear Ms. Barker,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding UPS's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxxvi} which is primarily implemented by DHS, violated International Human Rights.^{ccxxvii} We asked if UPS had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

UPS has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxxix} Actions assisting

DHS Actions, such as the four mentioned above, may implicate UPS in human rights violations. Therefore, under the UN Guiding Principles, UPS must conduct human rights due diligence to prevent or mitigate those violations.^{CCXXX}

UPS's own policies recognize and support the UN Guiding Principles, and commit UPS to conduct human rights due diligence. UPS's policy states:

"UPS supports the protection of human rights"

(See UPS's full policy at https://www.ups.com/media/en/code_bus_conduct.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers UPS's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how UPS is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it UPS's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Verizon

Dear Mr. King,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Verizon's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxxxi} which is primarily implemented by DHS, violated International Human Rights.^{ccxxxii} We asked if Verizon had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxxxiii} These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Verizon has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxxxiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Verizon in human rights violations. Therefore, under the UN Guiding Principles, Verizon must conduct human rights due diligence to prevent or mitigate those violations.^{ccxxxv}

Verizon's own policies recognize and support the UN Guiding Principles, and commit Verizon to conduct human rights due diligence. Verizon's policy states:

"We respect the broad principles in the UN Universal Declaration of Human Rights"
(See Verizon's full policy at http://www.verizon.com/about/sites/default/files/Verizon_Human_Rights_Statement.pdf)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Verizon's standing with the public. Companies connected with human rights abuses jeopardize their

brand and reputation. In seeking to understand how Verizon is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Verizon's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

VF Imagewear

Dear Mr. Hodges,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding VF Imagewear's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxxxvi} which is primarily implemented by DHS, violated International Human Rights.^{ccxxxvii} We asked if VF Imagewear had operationalized its human rights policy to ensure that it was not at risk of

contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxxxviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

VF Imagewear has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxxxix} Actions assisting DHS Actions, such as the four mentioned above, may implicate VF Imagewear in human rights violations. Therefore, under the UN Guiding Principles, VF Imagewear must conduct human rights due diligence to prevent or mitigate those violations.^{ccxl}

VF Imagewear's own policies recognize and support the UN Guiding Principles, and commit VF Imagewear to conduct human rights due diligence. VF Imagewear's policy states:

"All our significant investment agreements and contracts include human rights clauses or undergo human rights screening, as defined in our Global Compliance Program."

(See VF Imagewear's full policy at "https://business-humanrights.org/sites/default/files/VF%20Corporation_Know%20the%20Chain_Engagement%20questions.pdf")

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers VF Imagewear's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how VF Imagewear is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it VF Imagewear's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018 and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

Wildflower

Dear Ms. DeCastro,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding Wildflower International's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxli} which is primarily implemented by DHS, violated International Human Rights.^{ccxlii} We asked if Wildflower International had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxliii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

Wildflower International has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the “UN Guiding Principles”).^{ccxliiv} Actions assisting DHS Actions, such as the four mentioned above, may implicate Wildflower International in human rights violations. Therefore, under the UN Guiding Principles, Wildflower International must conduct human rights due diligence to prevent or mitigate those violations.^{ccxlv}

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers Wildflower International’s standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how Wildflower International is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it Wildflower International’s position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified “No, DHS Actions do not violate International Human Rights,” please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018, and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

XEROX

Dear Mr. Langsenkamp,

I am writing on behalf of NomoGaia, a non-profit research organization working in the field of business and human rights. We wrote to you in 2017, regarding XEROX's work as a prime contractor to the US Department of Homeland Security (DHS) (specifically, to TSA, USCIS, ICE and/or CBP).

In 2017, we pointed out that President Trump's "Travel Ban" Executive Order,^{ccxlv} which is primarily implemented by DHS, violated International Human Rights.^{ccxlvii} We asked if XEROX had operationalized its human rights policy to ensure that it was not at risk of contributing to potential human rights abuses caused by DHS's policies, procedures, actions and directives (collectively "DHS Actions").

Since then, DHS has been tasked with separating children from their migrant parents, incarcerating those children, and de-naturalizing current citizens. These DHS Actions, like the original Travel Ban, are in violation of international human rights conventions and norms. Specifically, the UN Office of the United Nations High Commissioner for Human Rights has found them in violation of the rights of children, and in violation of protections for asylum seekers codified in US law in accordance with International Humanitarian Law.^{ccxlviii}

These examples represent a track record of state-sponsored human rights abuses and pose a substantial risk that future DHS Actions imposed by this Administration may, likewise, constitute human rights violations.

XEROX has a responsibility to respect human rights as provided in the United Nations Guiding Principles on Business and Human Rights (the "UN Guiding Principles").^{ccxlix} Actions assisting DHS Actions, such as the four mentioned above, may implicate XEROX in human rights violations. Therefore, under the UN Guiding Principles, XEROX must conduct human rights due diligence to prevent or mitigate those violations.^{cc}

XEROX's own policies recognize and support the UN Guiding Principles, and commit XEROX to conduct human rights due diligence. XEROX's policy states:

"XEROX commits to respect human rights"

(See XEROX's full policy at <https://www.xerox.com/en-us/about/corporate-citizenship/human-rights>)

Trust and transparency have become very important to the American and International public. Involvement in internationally recognized human rights abuses, such as those mentioned above, violates international treaties and norms, and it endangers XEROX's standing with the public. Companies connected with human rights abuses jeopardize their brand and reputation. In seeking to understand how XEROX is implementing its own human rights policy, we are, again, requesting the following information:

1. Is it XEROX's position that the DHS Actions between January 2017 and the present have violated internationally recognized Human Rights?

If your response is an unqualified "No, DHS Actions do not violate International Human Rights," please state the basis of your position. Otherwise please answer the questions below.

2. Please describe the human rights due diligence you are conducting or will conduct on this issue, including (a) the processes that will be used, (b) the identity of the outside expert, if any, you will use, and (c) when you expect the human rights due diligence to be completed; and
3. Please provide the findings, results and conclusions of your human rights due diligence.

We request the answers to Questions 1 and 2 by August 3, 2018, and the answer to Question 3 as soon as it is available. We will publicly report on your initial response by September 3, 2018.

Thank you,
Mallory Miller
Miller@nomogaia.org
NomoGaia Analytics Team

cc: The Business and Human Rights Resource Centre;
Dr. Kendyl Salcito, Executive Director, NomoGaia

No substantive response

ⁱ "Protecting the Nation from Foreign Terrorist Entry into the United States"

ⁱⁱ See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: "US travel ban: 'New policy breaches Washington's human rights obligations'" <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21136&LangID=E>

ⁱⁱⁱ <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{iv} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^v “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{vi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{vii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

<http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21136&LangID=E>

^{viii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{ix} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^x “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business

partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

<http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21136&LangID=E>

^{xiii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xiv} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xv} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xvi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xvii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

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^{xviii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xix} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xx} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xxi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xxii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

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^{xxiii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

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^{xxvi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xxvii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

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^{xxviii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xxix} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xxx} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xxxi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xxxii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

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^{xxxiii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xxxiv} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xxxv} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business

partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xxxvi} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xxxvii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

<http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21136&LangID=E>

^{xxxviii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xxxix} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xl} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

^{xli} “Protecting the Nation from Foreign Terrorist Entry into the United States”

^{xlii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

<http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21136&LangID=E>

^{xliii} <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23174&LangID=E>

^{xliv} These are directly linked to the UN Global Compact here: <https://www.unglobalcompact.org/library/1461>. “In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. . . Human rights due diligence . . . should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships . . . UN Guiding Principles. Principle 17. http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

^{xlv} “The responsibility to respect human rights requires that business enterprises: . . . (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.” UN Guiding Principles, Principle 13. “For the purposes of these Guiding Principles a business enterprise’s “activities” are understood to include both actions and omissions; and its ‘business relationships’ are understood to include relationships with business partners, entities in its value chain, any other non-State or State entity directly linked to its business operations, products or services.” UN Guiding Principles, Commentary to Principle 13.

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^{xlvii} See, e.g. the International Covenant on Civil and Political Rights. See also the comments of the United Nations Commissioner for Human Rights that the Travel Ban is illegal under international law, as reported broadly, including, e.g. by Reuters at <http://in.reuters.com/article/usa-trump-immigration-un-idINKBN15E1SV>. For additional detail, see also the conclusions of the UN Special Rapporteurs: “US travel ban: ‘New policy breaches Washington’s human rights obligations’”

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