A Toolkit for Corporate Action to End Gun Violence

January 2022
Executive Summary: What You Will Find in the Toolkit

This Toolkit for Corporate Action on Gun Violence was developed to guide companies as they work to address gun violence, both internally in their own operations and externally in the communities they are linked to. The Toolkit is split into three sections: the business case, framework, and industry deep dives.

**BUSINESS CASE**

**Objective:**
Demonstrate how business is interconnected with gun violence and show the importance of company action on gun violence.

**Contents**
- Why businesses should be concerned with gun violence.
- Understanding where your company is in the gun violence supply chain.

**FRAMEWORK**

**Objective:**
Provide examples of potential actions for companies and connect with useful resources on advancing strategies against gun violence.

**Contents**
- Shows stages of action from most nascent (stage 1) to most advanced (stage 4) for companies taking action on gun violence.

**INDUSTRY DEEP DIVES**

**Objective:**
Demonstrate for specific sectors detailed case studies, actions, and key learnings for business action on gun violence.

**Contents**
- Industry-specific deep dives for:
  - Healthcare services and facilities
  - Retail
  - Financial services
  - Media and social media
  - Technology

*This toolkit was developed by BSR with the support of Everytown for Gun Safety who provided their expert perspectives on the topic of gun safety.*
Executive Summary: How Companies Can Use the Toolkit

Companies can use the toolkit in three ways: to make the business case for action, to assess where their company intersects with gun violence, and to identify opportunities to integrate actions to prevent gun violence in with existing strategies.

Build the business case
Use business case data to raise internal and external awareness on the importance of company action to prevent gun violence.

Assess where your company intersects with the gun violence value chain
Review the gun violence value chain and industry deep dives to identify where your company intersects with gun violence.

Identify actions to address gun violence
Follow the framework to understand the different stages of action from beginner to advanced and develop actions to address gun violence through new or existing work on human rights and community development.
Getting Started: Engagement Checklist

Five action items for your company to start taking action on ending gun violence:

- **Assess:**
  Assess where your company intersects with the gun violence value chain (see section 3, Taking Action).

- **Review:**
  Review Employee Health and Safety policies and products and services to ensure gun safety provisions are included to keep employees and customers safe (see section 3, Workforce and Operations and Products and Services).

- **Raise awareness:**
  Raise awareness within your organization on gun safety, including education, and training (see section 3, Workforce and Operations).

- **Support:**
  Support and partner with civil society organizations at the national level and in local communities working on gun safety and ending gun violence and conducting outreach (see section 3, Community Engagement).

- **Participate:**
  Participate in national and state-level sign-on letters and policy advocacy to support gun safety regulations (see section 3, Policy and Advocacy).
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Why Business Should Be Concerned with Gun Violence
Gun violence is a national human rights issue in the U.S. related to the most severe human rights abuse—the right to life. While it cuts across class, race, ethnic, and geographic lines, it disproportionately impacts communities of color. Businesses, their employees, business partners, and customers are likely to have been impacted by gun violence at some point.

Gun violence impacts communities around the country and costs companies millions annually

In the U.S., it’s possible to go to work—be it at a retail store, a corporate office, a distribution center, or a grocery store—on an otherwise normal day and never come home to your family.

**Gun violence is a national problem**

- 58 percent of American adults or someone they care for have experienced gun violence in their lifetime.
- On average, more than 100 Americans are killed with guns every day, and hundreds more are wounded.

**Companies lose millions annually due to gun violence**

- Gun violence costs taxpayers, businesses, survivors, families, and communities $280 billion per year—on top of the immeasurable emotional costs.
- Employers lose $1.4 million a day in productivity, revenue, and costs associated with gun violence.
Gun violence is not as divisive of a topic as many companies believe it is

There is broad support for gun safety legislation in the U.S. across states lines and political parties.

**AMERICANS OPINIONS ON GUN LAWS:**

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Favor %</th>
<th>Oppose %</th>
<th>No opinion %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requiring background checks for all gun purchases</td>
<td>96</td>
<td>4</td>
<td>*</td>
</tr>
<tr>
<td>Enacting a 30-day waiting period for all gun sales</td>
<td>75</td>
<td>24</td>
<td>1</td>
</tr>
<tr>
<td>Requiring all privately-owned guns to be registered with the police</td>
<td>70</td>
<td>29</td>
<td>1</td>
</tr>
</tbody>
</table>

92 percent of Americans support background checks for gun sales, and 57 percent say the laws covering the sale of firearms should be made stricter.

**FAVORABILITY TOWARD A COMPANY WITH DIFFERENT ANTI-GUN VIOLENCE INITIATIVES**

The American public would feel more favorable toward a company that actively supported gun safety laws, funded gun safety education, and/or prohibited customers bringing guns into stores.

- Actively supported gun safety laws: 72% favor, 71% more favorable
- Funded educational programs to promote gun safety: 52% favor, 41% more favorable
- No longer allowed customers to bring guns into its stores or locations: 41% favor, 41% more favorable
- Reduced the amount of business they do with gun retailers: 39% favor, 39% more favorable
- Reduced the amount of business they do with gun manufacturers: 39% favor, 38% more favorable
- No longer offered member discounts to the National Rifle Association (NRA): 39% favor, 39% more favorable
- No longer did business with gun retailers: 38% favor, 38% more favorable

Sources: Gallup, Edelman
Business can do more to protect, employees, consumers, and communities

Many companies see the issue of gun violence as falling outside their sphere of responsibility and influence. However, companies have a responsibility to provide safe working environments for their employees—something they cannot reasonably guarantee given the current state of gun violence in the U.S.

Gun violence happens in all types of workplaces and in the communities where companies operate and sell to.

Sadly, gun violence is increasingly impacting more communities around the country.
Investors have taken interest in companies' connections to the gun violence value chain. Several investors and organizations working with investors have integrated gun violence related issues into their portfolio management.

<table>
<thead>
<tr>
<th>ICCR Statement and Action</th>
<th>As You Sow</th>
<th>Institutional Investors</th>
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</thead>
<tbody>
<tr>
<td>• The Interfaith Center on Corporate Responsibility (ICCR) use shareholder advocacy to press companies on environmental, social, and governance issues, including human rights issues.</td>
<td>• As You Sow is a U.S.-based non-profit that works to promote environmental and social corporate responsibility through shareholder advocacy, coalition building, and innovative legal strategies.</td>
<td>• CalSTRS and State Street Global Advisors, among others, came together in a coalition of institutional and private investors with combined assets of more than $4.83 trillion to create and promote the Principles for a Responsible Civilian Firearms Industry.</td>
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<tr>
<td>• In 2018, the ICCR released an Investor Statement on Gun Violence, identifying 13 actions companies can adopt to reduce the risk of gun violence, many of them adapted from the Sandy Hook Principles.</td>
<td>• Their Guns Free Funds is made for people looking to align their investments with their values by moving money out of companies that make and sell guns. They have also developed a Guns Free Action Toolkit to support employees to advocate their company to move to a guns-free 401(k).</td>
<td>• BlackRock asks questions to civilian firearms manufacturers and retailers in effort to drive change. These questions include:</td>
</tr>
<tr>
<td>• The statement was endorsed by 142 investors representing US$634 billion in managed assets.</td>
<td>• What steps do you take to support the safe and responsible use of your products?</td>
<td>• What licensing do you have for your gun sales?</td>
</tr>
</tbody>
</table>
Consumer pressure is increasing on companies to take action on gun violence.

Consumers are becoming more aware of how companies intersect with gun violence and using their influence to encourage companies to take action.

**JUST Capital**
- **JUST Capital** is an independent nonprofit that tracks, analyzes, and engages with large corporations and their investors on how they perform on the public’s priorities.
- **JUST Capital** surveys Americans across the United States to understand what they believe U.S. companies should prioritize most when it comes to just business behavior. Protecting the health and safety of workers “beyond what is required by law” was a top priority for Americans in 2021. They also run focus groups to explore specific issues such as fair wages, gig/contract work, or caregiving.

**First National Bank of Omaha & Enterprise Holdings**
- For more than a decade, the First National Bank of Omaha issued what its ads described as the “Official Credit Card of the NRA”.
- Enterprise Holdings, which operates Enterprise, Alamo, and National Car, previously provided a member benefit to NRA members in the form of savings on car rentals.
- Following the Parkland shooting, both the First National Bank of Omaha and Enterprise Holdings separately cut their ties with the NRA and stopped providing benefits to NRA members — they reported that customer feedback caused them to review their relationships with the NRA.

**Groceries, Not Guns**
- Moms Demand Action began the “Groceries, Not Guns” campaign to target Kroger, one of the largest grocery chains in America.
- Kroger supported a U.S. law that would allow people to bring loaded guns in stores. Receipts showing over $250,000 in lost Kroger revenue, as a result of boycotts, were posted by consumers at Groceriesnotguns.com in the first 48 hours of the campaign alone.
- Kroger has since changed its policies and asks that customers to not bring guns into their stores.
<table>
<thead>
<tr>
<th>#</th>
<th>Company</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Dick’s Sporting Goods</td>
<td>Ended sales of all assault-style rifles in its stores in 2018, would no longer sell high-capacity magazines, and would require any gun buyer to be at least 21 years of age, regardless of local laws. Dick’s also announced it will remove firearms from many of its stores.</td>
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<tr>
<td>02</td>
<td>Walmart</td>
<td>Does not sell any firearm to anyone under 21 years of age and no longer sells assault-style rifles. After the shooting at a Walmart in El Paso, the company announced additional measures to keep its associates and employees safe, including discontinuing sales of short-barrel rifle ammunition, discontinuing handgun ammunition, and discontinuing handgun sales in Alaska, marking a complete exit from handguns.</td>
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<tr>
<td>03</td>
<td>Levi Strauss &amp; Co.</td>
<td>Established The Safer Tomorrow Fund to direct philanthropic grants to nonprofits and youth activists who are working to end gun violence in America and partners with Everytown for Gun Safety and executives from the business community. Levi’s also made a request to customers not to bring guns into stores and pledged CEO support for H.R. 8 to require background checks on all gun sales.</td>
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<tr>
<td>04</td>
<td>L.L. Bean</td>
<td>No longer sells guns or ammunition to anyone under the age of 21 (firearms specific to hunting and target shooting are only sold at its flagship store in Maine).</td>
</tr>
<tr>
<td>05</td>
<td>Kroger</td>
<td>Announced that it will not sell guns at its stores to people under 21.</td>
</tr>
<tr>
<td>06</td>
<td>REI</td>
<td>Does not sell guns, said it will stop ordering brands owned by Vista Outdoor until Vista Outdoor reconsiders its policies for its firearm brands.</td>
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<tr>
<td>07</td>
<td>Citibank</td>
<td>Released a U.S. commercial firearms policy that requires retail sector clients or partners to abide by several best practices prohibiting the sale of firearms without a completed background check, high-capacity magazines, and firearms to purchasers under the age of 21.</td>
</tr>
<tr>
<td>08</td>
<td>Bank of America</td>
<td>Stopped lending money to gun manufacturers that make military-style firearms for civilian use.</td>
</tr>
<tr>
<td>Companies Have Taken Action To Keep Communities Safe (2/2)</td>
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<td>----------------------------------------------------------</td>
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<tr>
<td>Everytown For Gun Safety (2018)</td>
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<tr>
<td>9</td>
<td>Amalgamated Bank does not lend to or bank for firearms manufacturers or sellers and has a robust policy on firearms.</td>
</tr>
<tr>
<td>10</td>
<td>BlackRock took steps to address the issue of firearms companies in index portfolios by engaging with firearms manufacturers and retailers regarding business policies and practices and offering clients a choice of products that exclude the firearms industry.</td>
</tr>
<tr>
<td>11</td>
<td>State Street Global Advisors and the California State Teachers’ Retirement System (CalSTRS), with other institutional and private investors with combined assets of more than $4.83 trillion, came together to create and promote the Principles for a Responsible Civilian Firearms Industry.</td>
</tr>
<tr>
<td>12</td>
<td>PayPal does not allow the use of its service or logo for selling firearms, certain firearm parts, or ammunition.</td>
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<tr>
<td>13</td>
<td>Authorize.net (a subsidiary of Visa) cut its relationship with North Carolina-based Hyatt Gun Shop – the self-proclaimed nation’s largest gun store.</td>
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<tr>
<td>14</td>
<td>Facebook limits posts on Facebook and Instagram discussing the sale of firearms to users over 18; warns people promoting the private sale of weapons to comply with relevant laws; and introduced “in-app education” on Instagram for those who search for gun promotions or sales. Facebook also banned users from coordinating private sales of firearms on Facebook and Instagram.</td>
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<tr>
<td>15</td>
<td>Salesforce changed its acceptable-use policy to ban customers that sell automatic and semiautomatic weapons, 3D-printed guns, and various accessories from using its sales management software.</td>
</tr>
<tr>
<td>16</td>
<td>TOMS, the shoe company, launched a campaign to end gun violence with a $5 million commitment to the issue.</td>
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</table>
Gun Violence is a Human Rights Issue

The UN Guiding Principles on Business and Human Rights (UNGPs) clearly state companies’ responsibilities to ensure businesses operate with respect for human rights. When it comes to human rights impacts related to gun violence, business may cause, contribute, or be directly linked to the violation.

UN Guiding Principle 13 states that business enterprises have a responsibility to respect human rights, which entails that companies should:

1. Avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur.

2. 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.

How gun manufacturers and related companies may be linked to human rights abuses

1. A company may cause an adverse human rights impact through a company’s own actions or failure to act, for example by failing to prevent the adverse impact of accidental deaths from guns.

2. A company may contribute to an adverse human rights impact through its own activities if it fails to incorporate prudent gun safety technology in the development of its products.

3. A company may be directly linked to an adverse human rights impact – impacts linked to the company’s products, services, or operations through a business relationship, without the company having contributed to the harm. This could be selling firearms to someone who then supplies the firearm to someone who commits violence against civilians against the local legislation.

Given the clear impacts of gun violence on human rights, including the right to life, companies should address gun violence as part of their responsibility to protect human rights.

Sources: UNGPs; John Ruggie Comments on Implications of UNGPs
A Framework for Corporate Action to End Gun Violence
This framework is designed to support companies to take external and internal actions throughout company value chains to end gun violence and respect human rights.

**INTERNAL ACTIONS**

- Workforce & Operations

**EXTERNAL ACTIONS**

- Community Engagement
- Policy & Advocacy

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*Adapted from BSR’s Healthy Business Coalition Framework*
 INTERNAL ACTIONS: Workforce & Operations, Products & Services

An average of 38,826 people die each year in the U.S. due to gun violence – it is likely that members of a company’s workforce will be impacted directly or indirectly by gun violence.

Companies have a responsibility to keep employees safe from external violence. Promoting gun safety internally could strengthen survivor support for impacted employees, prepare workforces for experiencing gun violence (i.e., parking lot policies), and decrease the likelihood of gun violence taking place within a company (i.e., secure storage programs).

All companies, whether or not they have brick and mortar locations, make up part of a value chain, or employ workers who will be impacted by gun safety laws.

Companies should conduct due diligence to assess risks to people, including in their own operations and through the provision of products and services. In addition, the way a company positions itself with respect to marketing and advertising, and products and services offered sends a message about values to consumers and business partners.
Gun violence occurs across the U.S. Many of the country’s largest cities, including New York, Philadelphia, and Chicago have seen sharp rises in gun violence over the past year, particularly in marginalized neighborhoods. A review of crime statistics among the nation’s 50 largest cities by the Wall Street Journal found that reported homicides were up 24% in 2021.

As an essential part of community engagement, companies can participate in violence intervention programs, including by partnering with local advocates, residents, survivors, and governments – many of which may also be part of company workforces and customer bases.

Gun safety legislation is consistently debated at the local, state, and federal levels, providing opportunities for companies to advocate for gun safety at multiple entry points. This includes legislation on waiting periods, background checks, secure storage, concealed carry, and the Charleston Loophole, issues which have wide support amongst Americans.

Companies should engage with local, state, and federal advocacy efforts to demonstrate support for eliminating gun violence and provide perspectives from the private sector on how gun violence impacts operations and workforces.
Taking Action
Companies’ products, operations and employees may intersect with the gun violence value chain at multiple points. Even if your company does not directly source guns or gun-related products, a supplier may be providing them for other companies, a retailer may be selling them, or a marketing partner may be promoting them.

<table>
<thead>
<tr>
<th>Gun Violence Value Chain</th>
<th>Business Activities</th>
<th>Types of Businesses Involved</th>
</tr>
</thead>
</table>
| How guns are financed    | • Credit/loans to gun manufacturers or retailers  
                           • Credit/loans to individuals who buys guns  
                           • Processing of transactions to buy guns  
                           • Insuring gun manufacturers; Underwriting issuances by gun manufacturers  
                           • Real estate investing / holdings leased by gun manufacturers | • Consumer and business banks  
                                                                             • Investors  
                                                                             • Third-party payment processors (e.g., online payment systems) |
| How guns are made        | • Gun or gun-related products manufacturers  
                           • R&D in guns and weapons (i.e., making guns safer, smarter gun safes)  
                           • Ghost guns, 3D printers, and online information related to gun violence | • Manufacturing  
                                                                             • Web services  
                                                                             • Research and development |
| How guns are distributed | • Retailers (online and in-person) selling guns, gun-related accessories, or facilitating the sale of guns  
                           • Retailers (online and in-person) selling materials that promote gun violence (e.g., t-shirts with guns printed on them)  
                           • Dealer/Distribution chains of guns and related products (storage, educational materials, etc.) | • Direct gun retailers  
                                                                             • Dealers & other indirect gun retailers selling products associated with gun violence  
                                                                             • Web services |
| How gun violence is promoted | • Advertisements for guns and gun-related goods (print and online)  
                               • Portrayals of gun violence in film and TV  
                               • Messaging around gun safety, educational campaigns, PSAs  
                               • Online content by individual users through social media  
                               • NRA partnerships and discounts | • Retail  
                                                                             • Media  
                                                                             • Tech  
                                                                             • Schools  
                                                                             • Any sector can form partnerships with organizations or on topics perpetuate or work to end gun violence |
| Where gun violence happens | • In retail and service locations, hotels, transportation where employees, business partners, and consumers interact  
                              • In offices, factories, distribution centers, etc.  
                              • At supplier and business partners’ locations  
                              • When employees are commuting to work  
                              • In the communities where companies operate and source from | • All companies are at risk of experiencing gun violence |
The following section shows actions that companies can take as divided into 4 stages, from most nascent (Stage 1), to most advanced (Stage 4). Each section has a table (example below) showing recommended actions by stage. Once a company has completed the actions in one stage, we recommend continuing to onto the next stage and addressing those recommended actions.

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Companies who are beginning their efforts to address human rights, and social issues such as gun violence should focus on actions recommended under Stages 1 and 2.</td>
<td></td>
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<tr>
<td>2</td>
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<tr>
<td>3</td>
<td>Companies with more advanced human rights and social strategies should aim to take actions under Stages 3 and 4.</td>
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<tr>
<td>4</td>
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</table>

Gun violence is a human rights issue. Thus, all companies regardless of maturity should be taking steps to address how they may be directly/indirectly linked to human rights abuses stemming from gun violence.
<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| 1     | Review Employee Health and Safety (EHS) policies to ensure gun safety provisions are included to keep employees safe. | Human Resources, Employee Health and Safety      | • Establish mechanisms to report behavior linked to gun violence or guns on company property (if not allowed), this can be designating someone in HR as a central person to monitor threats and risks.  
• Undertake a risk assessment to understand the potential threats of gun violence impacting employees, including looking at state laws.  
• The Everytown States Pages provide an overview of state gun laws. |
|       | Develop resources for employees who have been impacted by gun violence. | Human Resources                                  | • Provide information on access to different services, including access to mental health services.  
• Provide paid leave for victims of gun violence.  
• Establish support groups or access to existing support groups, such as the Everytown Survivor Network.  
• Provide financial support to victims of gun violence. |
|       | Ensure human rights commitments are aligned with existing global standards. | Human Resources, Employee Engagement, Human Rights| • Align human rights commitments with UNGPs, including developing or aligning commitments on protecting workforce from gun violence with broader human rights commitments. |
|       | Provide volunteer opportunities for employees related to gun violence prevention. | Human Resources, Employee Engagement              | • Support employees and ERGs to recognize National Gun Violence Awareness Day and Wear Orange to demonstrate support for gun violence prevention.  
• Support employees to volunteer with organizations who support non-violent conflict resolution organizations, gun safety organizations, organizations supporting domestic violence victims, suicide prevention, etc. |
| 2     | Support Employee Resource Groups (ERGs) to discuss gun safety and recognize national events. | Human Resources, Employee Engagement              | • Provide ERGs with resources related to gun violence and gun safety, such as safe storage information and trainings.  
• Encourage ERGs to participate in National Gun Violence Awareness Day.  
• Support ERGs to understand how their specific community is impacted by gun violence (i.e., suicide, domestic violence, homicide, etc.). |
### Internal Actions: Workforce and Operations

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
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<tbody>
<tr>
<td>3</td>
<td>Raise awareness with employees on gun safety, including safe storage and gun safety education and training.</td>
</tr>
<tr>
<td></td>
<td>Review employee benefits plan to ensure 401K and other investment plans are gun-free.</td>
</tr>
<tr>
<td></td>
<td>Ensure company efforts to address mental health, wellbeing, and intimate partner violence integrate gun safety measures.</td>
</tr>
<tr>
<td>4</td>
<td>Define a policy of zero tolerance towards firearms in and on company facilities (with focus on employees).</td>
</tr>
<tr>
<td></td>
<td>Define accountability for implementing zero-tolerance policy.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Business Function</strong></th>
<th><strong>Activities and Resources</strong></th>
</tr>
</thead>
</table>
| **Human Resources, Employee Engagement** | • Hold employee training sessions on safe storage and gun safety education.  
• Provide resources to employees on safe storage and gun safety education from external organizations if needed, such as BeSmart, and One Thing You Can Do which provides state-specific information. |
| **Human Resources, Benefits** | • Review As You Sow's Guns Free Funds to ensure investments are not going to companies that make and sell guns. |
| **Human Resources, Employee Health and Safety** | • Review resources provided to employees and ensure gun violence prevention is incorporated.  
• Provide information to all employees about the heightened risks of suicide domestic violence related to guns and information on services/hotlines for victims.  
• Review partner organizations to support employees and include groups with experience working with gun violence victims. |
| **Human Resources** | • Draft a policy of zero tolerance towards firearms in and on company facilities, for example, following the template developed by Society for Human Resource Management (SHRM), as legally allowed, that prohibits employees from bringing guns on company property.  
• OR Integrate zero tolerance towards firearms into existing workplace health and safety policies, as legally allowed.  
• Share the policy with all employees. |
| **Human Resources, Senior leadership** | • Ensure senior-level accountability to implement the policy.  
• Establish regular internal and external reporting and include gun violence prevention measures in annual public reporting. |
### Internal Actions: Workforce and Operations

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| 1     | Review policies to ensure gun safety provisions include company operations (i.e., retail locations, warehouses, etc.) | Human Resources, Workplace Health and Safety, Retail Operations | • Establish mechanisms to report behavior linked to gun violence or guns on company property, with a focus on customers.  
• Undertake a risk assessment to understand the potential threats of gun violence impacting operations, including looking at state laws. This can include reviewing company policies that allow, or prohibit customers carrying guns into retail facilities, warehouses, and other areas operation, as relevant. |
| 2     | Use social media and communications channels to raise awareness of gun safety policies and practices among customers. | Communications, Workplace Health and Safety | • Issue a statement outlining the company’s position on gun safety in operations (looking to company statements from Kroger’s, Walmart, and others).  
• Develop a social media campaign to raise awareness about the company’s position on gun safety among customers (i.e., banning customers from bringing guns into stores). This can include details on why company action is critical for reducing gun violence.  
• Develop communications materials for distribution at relevant operations (i.e., stores, warehouses, etc.). |
| 3     | Define a policy of zero tolerance towards firearms in and on company facilities. | Human Resources | • Draft a policy of zero tolerance towards firearms in and on company facilities, for example, following the template developed by Society for Human Resource Management (SHRM), as legally allowed, that prohibits employees from bringing guns on company property.  
• OR Integrate zero tolerance towards firearms into existing workplace health and safety policies, as legally allowed.  
• Share the policy with all employees. |
|       | Define accountability for implementing zero-tolerance policy. | Human Resources, Senior leadership | • Ensure senior-level accountability to implement the policy.  
• Establish regular internal and external reporting and include gun violence prevention measures in annual public reporting. |
## Internal Actions: Products and Services

<table>
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<tr>
<th>Stage</th>
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<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| Evaluate where products and services intersect with the gun violence value chain. | Evaluate where products and services intersect with the gun violence value chain. | Brands, Procurement, Marketing | Undertake an assessment of business activities to understand where your company’s products and services intersect with the gun violence value chain. Consider the following questions:  
- Do you manufacture or sell guns or gun accessories?  
- Do you source from suppliers that manufacture guns or gun accessories?  
- Do you manufacture or sell gun-related accessories?  
- Do you have brand partnerships with organizations that promote unsafe gun use?  
- Do you provide services that enable companies or individuals to make, buy, or sell guns?  
- Do you have operations where gun violence could occur?  
See the Industry Deep Dives section for sector-specific details. |
- Identify and assess those real and potential adverse human rights impacts across operations;  
- Based on the assessment, identify steps and to address those human rights impacts;  
- Define clear policies and processes to prevent and mitigate human rights risks  
- For example: publicly available responsible sourcing policies that clearly communicate human rights expectations; a responsible gun use policy that clearly stipulates due diligence expectations of its business suppliers, including retailers; a responsible marketing code of conduct that prohibits marketing strategies that target children. |
## Internal Actions: Products and Services

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| 2     | Identify opportunities to separate products and operations from gun    | Brands, Procurement, Marketing     | • Establish an internal task force to explore options to separate products and operations from gun violence value chain.  
• Assess suppliers to understand where they intersect with the gun violence value chain. |
|       | violence value chain (i.e., identifying alternative business partners, alternative sourcing practices, etc.). |                                    |                                                                                |
| 2     | Develop an action plan to dissociate products and operations from       | Brands, Procurement, Marketing     | • Develop an action plan to separate products and operations from gun violence value chain. This can include:  
• Stop allowing guns in company restaurants, stores, and places of operation.  
• If you sell guns, commit to stop selling assault-style rifles and high-capacity magazines, and to stop selling guns to anyone under 21.  
• Stop providing financial services to cover purchases of assault weapons, bump stocks, and other products that contribute to gun violence.  
• If a B2B service/product provider, ban customers that sell automatic and semiautomatic weapons, high-capacity magazines, and 3D-printed guns.  
• Establish a roadmap and time frame to implement the strategy.  
• Work with suppliers to separate products and operations from gun violence value chain. |
<p>|       | intersection points with gun violence.                                 |                                    |                                                                                |</p>
<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| 3     | Integrate gun violence prevention in products and marketing. | R&D, Brands, Marketing | • Develop products and services, as relevant to the company, that respond to the company’s intersections with the gun violence value chain. This may include promotional materials for community initiatives and gun safety partnerships in areas of company product/services distribution.  
  • If relevant, consider how products related to guns could be made safer, such as gun safes and identification locks. |
| 4     | Define a policy of a value chain free from gun violence, including management to support implementation and relevant targets and KPIs. | Brands, Procurement, Marketing, Sustainability/ESG reporting | • Track potential KPIs including:  
  • Number of suppliers who have committed to a gun violence-free value chain.  
  • Number of intersection points with the gun violence value chains (i.e., products, partnerships, services, etc.).  
  • Stop procuring from companies that manufacture guns.  
  • Stop manufacturing and selling guns and gun accessories.  
  • If a B2B service/product provider, ban customers that manufacture or sell guns. |
## External Actions: Community Engagement

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
</table>
| 1     | Support and partner with existing civil society organizations in local communities working on gun safety and ending gun violence and conduct outreach. | Sustainability, Employee Engagement, Community Engagement, Foundation | - Conduct outreach with potential local partners on gun violence prevention.  
- Review company-wide and due diligence engagement programs to include long-term partnerships with gun violence prevention organizations.  
Potential partners include:  
- **Everytown for Gun Safety** - a movement of Americans working together to end gun violence and build safer communities. They focus on reform in four main areas: background checks, domestic violence, preventable deaths, and gun trafficking.  
- **Community Justice Action Fund** - addresses the issue of gun violence in a holistic, sustainable, and intersectional manner, galvanizing the power of the people most affected by the pain to inform solutions that effectively tackle the root causes of gun violence. Their strategy focuses on a policy agenda, building a network of leaders, and training opportunities to prevent everyday gun violence. |
| 2     | Support employee donations to gun violence prevention organizations through corporate giving and donation matching schemes. | Sustainability, Employee Engagement, Community Engagement, Foundation | - Implement corporate giving and donation matching schemes that are reviewed to ensure programs exclude organizations that promote gun violence.  
- Encourage employee and leadership participation in local civil society initiatives on gun safety. |
| 3     | Leverage existing partnerships to address gun violence (i.e., domestic violence, mental health, etc.) | Sustainability, Employee Engagement, Community Engagement, Foundation | **National Coalition Against Domestic Violence** – a national organization dedicated to supporting survivors of domestic violence.  
**Active Minds** – national nonprofit supporting mental health awareness and education for young adults, with a focus on suicide prevention. |
## External Actions: Policy and Advocacy

<table>
<thead>
<tr>
<th>Stage</th>
<th>Action</th>
<th>Business Function</th>
<th>Activities and Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Participate in national and state-level sign-on letters to support gun safety regulations.</td>
<td>Public Policy, Government Relations</td>
<td>- When state and federal governments debate gun violence-related legislation, participate in sign-on letters to support gun safety regulations, such as universal background checks, permit requirements, and high-capacity magazine restrictions.</td>
</tr>
</tbody>
</table>
|       | Support research to understand how companies can effectively address gun violence across their value chain. | Social Impact, Foundation                              | - Partner with gun violence prevention organizations to undertake research on where industry value chains intersect with gun violence and how companies can effectively address gun violence across their value chain or within a specific industry.  
- Participate in National Gun Violence Awareness Day (June 4) by supporting Wear Orange to demonstrate support for the gun violence prevention movement. |
| 2     | Support state- and federal-level gun safety legislation.               | Public Policy, Government Relations                    | - Engage with state and federal advocacy groups working to end gun violence to stay up to date on changes in legislation.  
- Develop talking points for senior leaders to speak out against gun violence.  
- Leverage social media and communications to speak out against gun violence, for example, on National Gun Violence Prevention Day. |
|       | Ensure senior leadership is vocal on support for gun safety legislation. | Senior leadership, Communications, Social Media        | - Join senior-level company advocacy initiatives, such as the CEO letter from September 2019: 145 CEOs from some of America’s most recognizable companies (including Airbnb, Conde Nast, Uber, and others) came together to sign an open letter to the U.S. Senate, urging Congress to take immediate action on gun safety measures. |
|       | Collaborate with other companies and stakeholders to advocate for gun safety at state and federal levels. | Senior Leadership, Policy and Advocacy                 | - Review candidates and elected representatives’ positions on gun violence issues such as universal background checks, permit requirements, and high-capacity magazine restrictions.  
- The company prohibits lobbying efforts aimed to prevent/hinder the development of gun safety technologies, responsible gun regulations, and efforts to reduce legal barriers to access remedy for adverse human rights impacts associated to firearms |
| 3     | Review political contributions to ensure they support representatives that are in favor of gun safety regulations. | Government Relations                                   | - Review candidates and elected representatives’ positions on gun violence issues such as universal background checks, permit requirements, and high-capacity magazine restrictions.  
- The company prohibits lobbying efforts aimed to prevent/hinder the development of gun safety technologies, responsible gun regulations, and efforts to reduce legal barriers to access remedy for adverse human rights impacts associated to firearms |
There are many policy issues at the local, state, and national levels related to gun violence. Below is a selection of policy solutions to gun violence which companies should consider supporting as well as links with more information.

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>downloadable / ghost guns</td>
<td>Companies should not facilitate the sale of ghost guns (i.e., facilitating payments for ghost gun parts, hosting 3D printing files for downloadable guns), which are designed and sold as a way to circumvent gun laws, and are popular among people prohibited from owning firearms.</td>
</tr>
<tr>
<td>responsible gun ownership</td>
<td>Promote secure gun storage – to reduce risk of unintentional shootings and suicides. Promote gun owner safety training – to ensure education on responsible practices and storing.</td>
</tr>
<tr>
<td>background checks</td>
<td>Background checks are required for gun sales by licensed gun dealers, but not for guns sold by unlicensed sellers (i.e., sellers of guns online, at gun shows), enabling those with felony convictions and domestic abuse restraining orders to buy guns without a background check. The Charleston Loophole allows gun sales if after three days the FBI has not concluded an investigation into whether an individual is eligible to buy a gun.</td>
</tr>
<tr>
<td>accountability for the gun industry</td>
<td>Strengthen regulations for gun dealers – updating practices for storage, record keeping, training, etc. The Protection of Lawful Commerce in Arms Act (PLCAA) blocks legal responsibility for manufacturers, distributors, and dealers with irresponsible, reckless and negligent sales practices that enable illegal firearms distribution.</td>
</tr>
<tr>
<td>community safety</td>
<td>Prohibit open carry – often exploited by members of hate groups to intimidate others. Repeal stand your ground laws – which encourage avoidable escalations of violence. Support sensitive area restrictions – for places where children gather, places that serve alcohol, etc. Require permits for concealed carry – to encourage responsible gun ownership.</td>
</tr>
<tr>
<td>assault-style weapons</td>
<td>Prohibit assault-style weapons – exceptionally deadly firearms commonplace in mass shootings. Prohibit bump stocks – conversion devices that create a loophole for machine gun regulations.</td>
</tr>
</tbody>
</table>
Industry Deep Dives

Healthcare Services and Facilities  Retail  Financial Services  Media and Social Media  Technology
Healthcare Services and Facilities
Rising violent death rates in the United States, driven by increasing firearm homicide and suicide, put attention on the role the healthcare sector plays in prevention and intervention.

This section will focus on Healthcare Services and Facilities – hospitals, healthcare providers, congregant living, etc.

### Public Health Approach to Gun Violence Prevention

- **Hospital Based Violence Intervention Programs:** there is a unique window of opportunity to engage victims of gun violence in the immediate aftermath of a traumatic injury. Programs located in trauma centers and emergency departments can engage patients while they are still in the hospital to reduce the chance of retaliation or the recurrence of violence.

- **Medical Counseling on Access to Lethal Means:** Physicians and other medical professionals are crucial sources of information about the risk of firearm access. By asking their patients about firearm access and counseling them about firearm suicide risk, medical professionals can help prevent these deaths.

### Public Health Cost of Gun Violence

- Violence raises the demand for health services. About 2.3 million people in 2017 were treated in emergency rooms for violent injuries.

- Estimates of the cost of gun violence vary. Recent studies find that between 2006 and 2014, the average annual cost of initial inpatient hospitalizations for gunshot wounds was $734.6 million (based on hospital costs).

- Others find that the estimated the average emergency department and inpatient charges for the same period at $2.8 billion per year (based on charges).

Sources: Educational Fund to Stop Gun Violence; Northwell Health; American Psychological Association
How gun violence is promoted

Healthcare companies play an important role in positioning gun violence as a public health issue. These include hospital-based violence interruption and medical counseling on access to lethal means.

Where gun violence happens

Gun violence can take place anywhere. Healthcare companies have a role to play in enacting policies that protect their employees and customers both online and in-person. All healthcare facilities should be gun-free zones.
Given the intersections with how guns are made and distributed and how gun violence is promoted and where it occurs, Healthcare companies should consider the following actions.

**STAGE 1**
- Consider how your company intersects with the gun violence supply chain
- Make healthcare facilities gun-free
- Ensure mental health services, suicide prevention efforts, pediatric services among others understand, and address the risks of guns

**STAGE 2**
- Develop action plan to implement services that prevent gun violence, this could include safe storage guidance and additional prevention efforts
- Develop partnerships with mental health services and local organizations to prevent gun violence (e.g., conflict resolution organizations and gun violence interrupters)

**STAGE 3**
- Contribute to research that makes gun violence a public health issue
- Cost and impacts measurements

**STAGE 4**
- Develop awareness-raising campaigns within communities around gun violence prevention, safe storage, etc.
- Develop community-level goals related to gun violence (e.g., reduction in number of gun-related incidents)
Kaiser Permanente is the largest nonprofit, integrated health system in the U.S. In 2019 they pledged to fund 3 clinical research studies focusing on how clinicians can help prevent firearm injuries—including suicide, intimate partner violence, and accidents—as part of its pledge to invest $2 million to prevent gun injuries and deaths.

Proposed Clinical Research Studies

- Understanding risk factors of firearm-related injuries and death in adult and pediatric populations: Risk prediction and opportunities for prevention – Kaiser Permanente Southern California Department of Research & Evaluation.
- Integration of firearm suicide-prevention tools in health care settings: Patient-reported access to firearms and decision aid for storing firearms.

Sources: Kaiser Permanente
Northwell Health created the Center for Gun Violence Prevention—an initiative calling for the critical need to implement evidence-based firearm injury and mortality prevention strategies in health care, especially within at-risk communities.

The objectives of the collaborative are

- Provide a platform for sustained dialogue on gun violence as a public health issue, providing an opportunity to showcase the work of health care industry leaders.
- Mobilize all layers of the Healthcare Industry to develop a community of support to explore mentorship, partnerships, and opportunities for system-level workflows and protocols.
- Spur action with a multi-year, phased approach hinging on exploration, implementation, and evaluation. Participants will commit to the growth of the learning community by completing pre-/post-evaluations, sharing learnings, and disseminating best practices to their home institutions.

I firmly believe that health care leaders have a social responsibility to try to stop the mindless bloodshed caused by firearms-related violence in this country, just as we respond aggressively to health crises like vaping, the flu, or the new coronavirus that is causing worldwide panic.

Northwell President and CEO Michael Dowling.
Retail companies are on the frontline of gun violence and prevention, as brick and mortar shops are common locations for guns to be sold and for gun violence to take place.

Moms Demand Action has led a number of campaigns targeting retail stores, encouraging them to enact policies and practices that encourage gun safety are fundamental to keep retail employees, customers, and communities safe. One example of those campaigns, focused on Starbucks is shared below.

Despite having banned smoking 25 feet from all locations, it was still allowed to bring armed weapons into Starbucks stores. Moms Demand Action began a campaign, asking consumers to skip visits to Starbucks once week with the “Skip Starbucks Saturday” initiative. The Moms Demand Action community increased more than 10% during the “Skip Starbucks Saturday” campaign, from 105,458 to 117,027.

Sources: Moms Demand Action; Newsweek
## Retail | Intersections with the Gun Violence Value Chain

<table>
<thead>
<tr>
<th>How guns are made</th>
<th>How guns are distributed</th>
<th>How gun violence is promoted</th>
<th>Where gun violence happens</th>
</tr>
</thead>
<tbody>
<tr>
<td>![Gun Icon]</td>
<td>![Distributors Icon]</td>
<td>![Gun Violence Icon]</td>
<td>![Gun Violence Icon]</td>
</tr>
</tbody>
</table>

**How guns are made**
Retail companies with their own brands may have direct and indirect ties with gun manufacturers, as gun manufacturers can be related to companies selling a variety of products aside from guns and firearms (i.e., parent or subsidiary companies).

**How guns are distributed**
Distributors of guns and firearms often carry other consumer goods. Retailers can enhance their gun safety regulations; and consumer goods companies can exert pressure on retailers to speak out.

**How gun violence is promoted**
Gun violence may be promoted through images, words, and themes can be proliferated on t-shirts, games, advertising, and other avenues. Lobbying local and federal lawmakers to enact legislation promoting gun safety is another way for consumer goods companies to positively use their influence.

**Where gun violence happens**
Gun violence can take place anywhere, including locations where consumer goods are sold, which makes it vital for companies to define policies and protections for their workforce and customers against gun violence.
Given the intersections with how guns are made and distributed, and how gun violence is promoted and where it occurs, Retail companies should consider the following actions.

**STAGE 1**
Evaluate where products and services intersect with the gun violence value chain
- Assess own operations (i.e., gun/accessories manufacturing, gun/accessories distribution)
- Assess supplier relationships to understand where suppliers and parent/subsidiary companies may intersect

**STAGE 2**
Develop action plan to eliminate products that encourage gun violence
- Prohibit carrying of guns and firearms in retail locations
- Remove imagery that promotes gun violence from stores (i.e., t-shirts, posters)
- Prohibit sales of assault-style rifles, high-capacity magazines, and gun sales to anyone under 21 years old and require background checks for all gun sales

**STAGE 3**
Integrate gun violence prevention in products and marketing
- Develop products and services that respond to the company’s intersections with the gun violence value chain
- Provide educational materials about gun safety and offer gun locks
- Use social media and communication channels to promote gun safety

**STAGE 4**
Define a policy of a value chain free from gun violence, including management to support implementation and relevant targets and KPIs
Retail | Restricting Gun Violence from Taking Place

Subway and Starbucks revised company policies to disallow customers from being allowed to openly carry in their restaurants, following consumer pressure on these companies to enhance safety precautions for their workforce and customers.

Sources: Subway; Business Insider; Travis Long, Twitter
Levi Strauss & Co. uses its voice as a global company to speak out against gun.

They established The Safer Tomorrow Fund to direct philanthropic grants to nonprofits and youth activists who are working to end gun violence in America and partners with Everytown for Gun Safety and executives from the business community.

Levi’s also made a request to customers not to bring guns into stores and pledged CEO support for H.R. 8 to require background checks on all gun sales.
In 2018, REI suspended its relationship with Vista Outdoor, the parent company for Savage Arms which manufactures guns, “including modern sporting rifles”. Given Vista Outdoor’s silence on gun safety and failure to support common sense gun safety solutions, REI placed a hold on Vista Outdoor’s subsidiary companies (Giro, Bell, CamelBak, Blackburn and Camp Chef).

In 2019, Vista Outdoor secured a buyer for Savage Arms and REI announced it would resume orders with the company’s subsidiaries.

Today, we notified our merchants that we will resume orders with Giro, Bell, CamelBak, Blackburn and Camp Chef on the news that their parent company, Vista Outdoor, has secured a buyer for Savage Arms.

REI orders of Vista-owned brands have been on hold since March 2018. At that time, Vista Outdoor chose not to engage in the national conversation about common-sense gun safety solutions that followed the tragic mass shooting at Marjory Stoneman Douglas High School in Parkland, Florida.

REI does not sell guns or ammunition, and does not oppose hunting or the Second Amendment, but we believe companies that profit directly from the sale of guns have a civic responsibility to engage in the national discussion about gun safety, as Dick’s Sporting Goods, Walmart and others have done.

We understand and respect that our members and employees enjoy life outside in many ways — including hunting.
Retail

Changing Policies to Respond to Gun Violence Taking Place

Dick’s pulled guns out of 10 stores and filled the empty space with products targeted for those markets, such as sports team merchandise. Those 10 stores outperformed the rest of the chain. In March 2018, Dick’s said it was pulling all guns from 125 of its roughly 730 total stores. Dick’s has now pulled guns from over 400 stores.

Following the 2018 Parkland Shooting, Dick’s Sporting Goods, which is a gun retailer, overhauled its gun policies. These include:

• Pulling all assault-style weapons from its stores
• Banning high-capacity magazines and "bump stocks" (that can convert semiautomatic weapons into machine guns)
• Prohibiting sale of firearms to people under 21
In 2018, following the Parkland mass shooting, Walmart made some policy changes to its gun sales in favor of gun safety:

- Raising the age for purchasing a gun in its stores from 18 to 21
- Requiring gun buyers to pass background checks

- Declining to sell bump stocks
- Asking customers not to openly carry guns into its stores

In 2019, following a mass shooting at a Walmart in El Paso, Texas, Walmart made further policy changes, including:

- Discontinuing sales of short-barrel rifle ammunition such as the 223 caliber and 5.56 caliber that, while commonly used in some hunting rifles, can also be used in large capacity clips on military-style weapons
- Discontinuing handgun ammunition
- Discontinuing handgun sales in Alaska, marking a complete exit from handguns

CNN: Walmart Gun Violence Restrictions
Industry Deep Dives

Financial Services
There are two publicly traded firearms manufacturers: Sturm Ruger and Smith & Wesson. Often without realizing it, institutional investors may be connected to gun violence through their investments in gun manufacturing companies and distributors, insurance, and underwriting.

Banks may also provide commercial loans to gun companies, while financial services platforms like credit cards and third-party payment processors play a role in enabling sales and purchase of guns and firearms.

Bank of America announced in 2018 that it would stop lending money to gun manufacturers who make military-style firearms for civilian use. For the time being, Bank of America continues to offer banking services to firearms retailers, regardless of the firearms they carry, or of the retailers’ gun safety policies.

For life insurance, risky avocations such as private aviation, scuba diving, and rock climbing might be considered in the underwriting process, though firearm ownership generally is not. The death rate attributable to gun ownership is 46% higher than scuba diving (apx. 240 deaths per million gun owners). Scuba is commonly used in insurance underwriting; gun ownership is not.

In the year following the Sandy Hook massacre in Newtown, Connecticut, shares in the publicly traded companies Sturm Ruger and Smith & Wesson jumped more than 70%, benefiting institutional investors such as Vanguard, Blackrock, and Fidelity. The tables below show the percentage of Vanguard’s and Fidelity’s fund assets that are composed of civilian firearms investments.
Financial Services | Intersections with the Gun Violence Value Chain

How guns are financed

Investors may have investments in gun manufacturers, distributors, and other companies that are directly or indirectly linked to the gun violence supply chain. Often these links are hidden from public view – for example by including companies associated with gun violence in mutual funds, or by funding parent/subsidiary companies. Financial transactions like loans, credit services, private equity investment, insurance, underwriting, and real estate holdings can also finance gun manufacturing and distribution, as well as sponsorship or co-branded credit cards with companies without good gun safety practices.

How guns are distributed

Financial services platforms, such as credit card companies and third-party payment platforms, enable guns and firearms to be bought and sold. Adding background checks, geographical barriers (i.e., to prohibit transactions at gun shows), and/or age barriers (i.e., to prevent those under 21 from buying guns) can help to prevent gun violence.

Where gun violence happens

Investors have the responsibility to influence portfolio companies to undertake due diligence that includes gun violence, enact policies and protections that promote gun safety and when pressure to change policies is met with resistance or lack of change, consider responsibly divesting from gun manufacturers.

Financial services companies should take steps to prevent gun violence from taking place within their own operations.
Financial Services | Actions to Promote Gun Safety

Given the intersections with how guns are financed and distributed and where gun violence occurs, Financial Service companies should consider the following actions.

**STAGE 1**
Evaluate and disclose where services intersect with the gun violence value chain
- Identify portfolio companies directly linked to gun violence (e.g., produce or distribute civilian or military firearms)
- Identify portfolio companies indirectly linked to the gun violence value chain

**STAGE 2**
Develop an action plan to address gun violence
- Integrate gun violence in due diligence processes and codes of conduct
- Encourage companies to halt activities that contribute to gun violence
- If engagement fails, responsibly divest from companies contributing to gun violence (see next page for more information)

**STAGE 3**
Integrate gun violence prevention in products and marketing
- Develop products and services, i.e., gun-free funds, payment blocks for anyone under 21, geolocation services that block purchases at unregulated gun shows
- Prohibit lending to clients and customers who manufacture and/or distribute guns
- Absent gun safety policies (background checks, age minimums)

**STAGE 4**
Define a policy of a value chain free from gun violence, including management to support implementation and relevant targets and KPIs
In 2018, BlackRock unveiled a range of index products that would enable investors to withhold their support for gunmakers and sellers. BlackRock also began offering an option to take the guns out of institutional strategies tracking major market indexes, including the Standard & Poor’s 500, the Russell 2000, and three others.

These changes were made largely following demands from their own customers.

Following investor pressure from CalSTRS (which has $750 million invested in Cerberus), Cerberus Capital Management, a private equity firm, said that it would seek to sell off ownership of the Freedom Group (now Remington Outdoor) – the maker of the assault rifle used in the Sandy Hook massacre.
Following the Parkland shooting in 2018, Citi instituted a U.S. Commercial Firearms Policy requiring new retail sector clients or partners to adhere to best practices, including:

1. They don’t sell firearms to someone who hasn’t passed a background check,

2. They restrict the sale of firearms for individuals under 21 years of age, and

3. They don’t sell bump stocks or high-capacity magazines.
A coalition of long-term, global institutional and private investors created the Principles for a Responsible Civilian Firearms Industry in 2018. The principles provide a framework for institutional investors seeking to improve engagement with public and private companies globally that manufacture, distribute, sell or regulate products within the civilian firearms industry to address gun safety issues.
Responsible divestment is an approach that includes divestment decisions based on the assessment of corporate human rights performance, including progress over time, regardless of sector or operating context. If investors choose to divest from the gun violence value chain, they should do so responsibly.

Why responsible divestment?

- **When an investor lacks sufficient leverage to change the behavior of an investee** and is unable to influence the investee to address adverse human rights impacts, the investor may consider responsible divestment. Companies may attempt to engage with other shareholders to increase their leverage.

- The UN Guiding Principles on Responsible Business Conduct state that a business relationship may have to be terminated if efforts to exercise leverage aimed at addressing an adverse human rights impact prove unsuccessful.

- Divestment from a company may be an appropriate response after continuous failed attempts at mitigating harm, where mitigation is unfeasible or because the severity of the adverse impact warrants it.

- When considering whether to divest, investors should also assess whether ending the relationship with the investee would result in adverse impacts.

- Divestment may not be appropriate in all cases because without investors engaging on human rights concerns, there is often no other voice persuading the company to change its practices.

How to responsibly divest:

Those who divest from a company are advised to issue a press release explaining why, thereby imposing greater pressure on the company and creating leverage for others who have not divested.

This can take place either before or after divestment has been completed.
Media & Social Media
Mass media outlets have done little to influence changes in the national discourse on gun violence. The approach to reporting has called into question the role of major media outlets in promoting gun violence.

Media and social media companies should assess how the content they promote, directly or indirectly, contributes to the gun violence value chain.

Critics of media coverage recommend changes to coverage of mass shootings to alter the predictable news cycle that follows mass shootings:

- Alternating between “thoughts and prayers” rhetoric and the perspective of organizations opposing common sense gun safety in a way that hijacks balanced storytelling.

- Focusing on the shooter may inspire or encourage others.

- Use media to show Americans the truth, remembering that photojournalism of the Vietnam War was one of the most effective ways to raise awareness among Americans and to eventually stop the war.

A growing body of evidence disproves a causal link between violent video games and gun violence events in the U.S. However, video games can serve as indirect advertisers for gun manufacturers.

In the wake of the Sandy Hook massacre, EA said it would cut licensing ties with manufacturers—removing links to weapons companies and to gun magazines where gamers could view real versions of the weapons featured in their games.

1 Deakin University: Can the media change American attitudes to guns?; 2 The Atlantic: Changes to the Post Massacre Ritual; 3 Ibid.
References to gun violence have proliferated across different social media networks and platforms, often in reference to political exchanges, and in the context of hate speech.

While many social media companies have integrated gun violence prevention into some company policies, approaches are largely inconsistent.

The word “gun” appears once in Facebook’s policy on Violence and Incitement to prohibit images that show a gun to the head.

Facebook has other company policies that address gun safety – in its advertising policy, and on prohibiting firearm sales on its marketplace.

Neither “guns” nor “firearms” are mentioned in Twitter’s policy on Glorifications of Violence. However, Twitter’s advertising policy prohibits the promotion of weapons and weapon accessories.
The tragic mass shooting at two mosques in Christchurch, New Zealand killing 52 people in 2019 was designed by a white supremacist to go viral on social media networks and was broadcasted on Facebook Live.

The horrible event led to a call to eliminate terrorist and violent extremist content online.

The tragedy led to the creation of the Christchurch Call: a call for collaboration between governments, civil society, and online service providers to eliminate terrorist and violent extremist content online.

A number of the biggest global social media companies have joined the Christchurch Call.

Commitments from online service providers include:

- Take transparent, specific measures to prevent the upload of terrorist and violent extremist content and to prevent its dissemination on social media, including immediate and permanent removal
- Provide greater transparency in the setting of community standards or terms of service
Media & Social Media | Intersections with the Gun Violence Value Chain

How gun violence is promoted

Major media and social media companies have been criticized for failing to regulate dissemination of dangerous and extremist content linked to gun violence.

Gun violence can be promoted through media discourse as well as through advertising and other avenues that directly and indirectly support gun violence.

Where gun violence happens

Gun violence can take place anywhere. Media and social media companies have a role to play in enacting policies that protect their employees and customers both online and in-person.
Given the intersections with how gun violence is promoted and where it occurs, media and social media companies should consider the following actions.

**STAGE 1**
Evaluate where intersections with the gun violence value chain
- Assess content moderation, hate speech, and other policies for their inclusion of gun safety practices
- Assess partnerships with advertisers, marketers that contribute to the gun violence value chain

**STAGE 2**
Develop action plan to dissociate products from gun violence
- Prohibit licensing, marketing, and advertising with partners that promote gun violence
- Prohibit customers and clients from using services and platforms to promote gun violence
- Prohibit informal gun ads via influencer-sponsored posts
- Prohibit distribution of files for downloadable guns
- Consider controls for extremist content linked to gun violence
- Institute processes to detect the use of social media platforms to promote gun violence

**STAGE 3**
Integrate gun violence prevention in products and marketing
- Use platforms and services to disseminate gun safety practices and rhetoric

**STAGE 4**
Define a policy of a value chain free from gun violence, including management to support implementation and relevant targets and KPIs
In preparation for Joe Biden’s Inauguration in 2021, Facebook banned advertisements that promote weapon accessories and protective equipment in the U.S., primarily in response to the 2021 U.S. Capitol attack on January 6.

Facebook had already prohibited advertisements for weapons, ammunition and weapon enhancements like silencers, and expanded this policy to include advertisements for accessories such as gun safes, vests and gun holsters in the U.S.
As new technologies arise, tech companies must be aware of how their products can directly or indirectly support gun violence, such as with the distribution of gun blueprints for 3D printers.

Innovation in gun safety technology has accelerated in the wake of mass shootings.

“A personalized—or "smart"—gun is a firearm that employs authorized-use technology, like the thumb scan or passcode available on many smartphones, to turn stolen guns and guns accessed by children into harmless pieces of steel. If widely implemented, it would be a game-changer for keeping guns out of the hands of children and criminals.”
- Everytown

Smart Guns & Safe Storage are designed to provide access only to a firearm’s owner, or designated users, primarily using biometric data (i.e., fingerprint) and Radio-Frequency Identification (RFID) (i.e., such as a building access fob).

Sources: Deakin Smart Tech Foundation: Gun Safety Tech; Time: Protective Tech for School Shootings; Forbes: Gun Distribution through Software
## Tech | Intersections with the Gun Violence Value Chain

<table>
<thead>
<tr>
<th>How guns are made</th>
<th>How guns are distributed</th>
<th>How gun violence is promoted</th>
<th>Outward Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech can be used to manufacture guns, including ghost guns that are unregistered and therefore impossible to monitor or track.</td>
<td>Tech can be used to distribute information on how to purchase or manufacture guns, including ghost guns. Logistics platforms can also be used to foment gun distribution, including indirectly through partnerships. Downloadable / 3D printed guns can be distributed through online files.</td>
<td>Major tech and social media companies have been criticized for failing to regulate dissemination of dangerous and extremist content that has been linked to gun violence. Gun violence can be promoted through media discourse as well as through advertising and other avenues that directly and indirectly support gun violence.</td>
<td>Gun violence can take place anywhere. Media &amp; tech companies have a role to play in enacting policies that protect their employees and customers both online and in-person.</td>
</tr>
</tbody>
</table>
Given the intersections with how guns are financed and distributed and where gun violence occurs, Tech companies should consider the following actions.

**STAGE 1**
Evaluate where intersections with the gun violence value chain
- Assess hate speech and other policies for inclusion of gun safety practices
- Assess partnerships with advertisers, marketers that contribute to the gun violence value chain
- Evaluate vendor relationships, screening clients for ties to gun industry
- Create a Gun Safety Code of Conduct for clients and vendors

**STAGE 2**
Develop action plan to dissociate products from gun violence
- Prohibit licensing, marketing, and advertising with partners that promote gun violence
- Prohibit customers and clients from using services and platforms to promote gun violence

**STAGE 3**
Integrate gun violence prevention in products and marketing
- Where relevant, innovate in gun safety products, or disseminate information on promoting gun safety in products and marketing

**STAGE 4**
Define a policy of a value chain free from gun violence, including management to support implementation and relevant targets and KPIs
While the silence and inaction of some tech companies has been criticized by gun safety advocates, other tech companies have adapted their policies and practices to promote gun safety.

Retailers like Amazon, eBay, and Salesforce have banned or restricted sales of guns on their platforms. Salesforce reinforced its stance on preventing gun violence by banning retailers that sell certain guns and ammunition from using its software.

Salesforce updated its Acceptable Use Policy to prohibit customers who use its software from selling firearms, including semi-automatic weapons, 3D-printed guns, and large-capacity magazines.

Sources: Salesforce: Acceptable Use Policy; Amazon: Seller Central; Forbes: Tech Preventing Gun Violence
Tech | Innovating to Block 3D Gun Manufacturing and Distribution

3D printing technology has broadened the ability to manufacture a variety of products easily and cheaply. Unfortunately, firearms are one of the products which, due to the proliferation of blueprints for 3D printed guns online, have seen an uptick in production.

Major concerns about 3D printed guns included that they are untraceable as they do not have serial numbers, and undetectable by metal detectors as they are made of plastic. Further, enforcement of age restrictions and background checks is nearly impossible, given the lack of traceability of 3D printed guns.

In response to the release of blueprints for 3D printed guns, many 3D printing companies, including Sculpteo and Materialise have banned the printing of firearms and launched features to block the production of guns on their 3D printers.

Sources: Sculpteo: Why we don't 3D Print Guns; The Trace: 3D Printed Guns
Reporting on Gun Violence Prevention Efforts
Few companies report on gun violence despite obvious links to existing sustainability reporting frameworks

Many companies do not report on gun violence incidents—doing so is an area for potential leadership. Given an increased investor focus on gun safety, it is expected that investors will be looking for improvements in disclosures around gun violence and gun safety.

Existing reporting platforms, such as GRI, cover areas where gun violence should be reported.

Disclosure 403-2
Hazard identification, risk assessment, and incident investigation

Reporting requirements

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including:
   i. how the organization ensures the quality of these processes, including the competency of persons who carry them out;
   ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.

b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals.

c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals.

d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.

Disclosure 403-9
Work-related injuries

Reporting requirements

The reporting organization shall report the following information:

a. For all employees:
   i. The number and rate of fatalities as a result of work-related injury;
   ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
   iii. The number and rate of recordable work-related injuries;
   iv. The main types of work-related injury;
   v. The number of hours worked.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:
   i. The number and rate of fatalities as a result of work-related injury;
   ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
   iii. The number and rate of recordable work-related injuries;
   iv. The main types of work-related injury;
   v. The number of hours worked.

b. The work-related hazards that pose a risk of high-consequence injury, including:
   i. how these hazards have been determined;
   ii. which of these hazards have caused or contributed to high-consequence injuries during the reporting period;
   iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.

b. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.

c. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.

d. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.

e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.
Reporting on gun violence prevention efforts

Companies can report on their progress towards implementing gun violence prevention efforts in their risk management reporting, sustainability reports, or along with reporting on other community initiatives.

**Policy**
- The company publishes a gun violence prevention policy stating:
  - Where the company interacts with the gun violence value chain
  - Steps towards implementing the policy
  - Responsibility for overseeing the policy
  - Connections with other company policies (i.e., workplace health and safety, community empowerment, etc.)

**Efforts**
- Implementing gun violence prevention policies
- Investing in community gun violence prevention initiatives
- Sensitization of suppliers on gun violence prevention opportunities
- Participation in local or national advocacy initiatives
- Reporting can also be included in business-as-usual risk management reporting, as many of these actions are aligned with established risk management practices

**KPIs**
- Number of suppliers that have committed to a value chain free from gun violence
- Number of intersection points with the gun violence value chain (i.e., products, partnerships, services)
- Amount invested in community programs towards gun violence prevention
- Number and type of advocacy initiatives supported
Examples of how companies have reported on gun violence in annual sustainability reports

Both Molson Coors and UPS have lost employees on the job to gun violence. Molson Coors explicitly mentioned the incident, while UPS listed the fatalities from the shooting.

On February 26, 2020, a mass shooting occurred at the Molson Coors Beverage Company in Milwaukee, killing six employees.

UPS lost three employees to gun violence in 2016. They do not specifically mention the shooting in their report, but they reported on fatalities as required by GRI.
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ammunition Regulation</td>
<td>Regulation for ammunition (i.e., bullets) buyers — ensuring limits on amount of ammunition that can be purchased, as well as age limits. Ammunition is not yet subject to the same federal control as firearms.</td>
</tr>
<tr>
<td>Assault Weapons</td>
<td>Definition of assault weapons is a contentious issue. The federal government refers to military-style weapons capable of firing multiple rounds, either semi-automatic or a fully automatic—including AR-15s.</td>
</tr>
<tr>
<td>Background Checks</td>
<td>A process requiring: the gun purchaser to present an ID and fill out ATF Form 4473, the dealer to submit this information to the FBI or state agency, the agency to determine if the individual can legally purchase a firearm, the agency to alert the dealer of the result (i.e., proceed, deny, delay).</td>
</tr>
<tr>
<td>Bump Stocks</td>
<td>Conversion devices designed to mimic automatic gun fire. When applied, these can effectively convert rifles into machine guns.</td>
</tr>
<tr>
<td>Concealed Carry</td>
<td>Carrying a concealed firearm in public, where the firearm cannot be seen by the casual observer.</td>
</tr>
<tr>
<td>Downloadable Guns</td>
<td>A gun blueprint or computer code that allows the 3-D printing of a fully-functional gun. These can evade metal detectors and exist completely outside the federal firearms licensee system and cannot be traced if used in crime.</td>
</tr>
<tr>
<td>Firearms</td>
<td>A type of gun designed to be readily carried and used by an individual. <strong>ATF definition:</strong> “any weapon which will or is designed to or may readily be converted to expel a projectile by the action of an explosive.”</td>
</tr>
<tr>
<td>Guns</td>
<td>A gun is a weapon designed to use a shooting tube / gun barrel to launch typically solid projectiles, but can also project pressurized liquid, gas or charged particles.</td>
</tr>
<tr>
<td>Gun Dealers</td>
<td>Any person, group, or company engaged in the business of selling firearms at wholesale or retail.</td>
</tr>
<tr>
<td>Gun Safety</td>
<td>Education on and practice of using, transporting, storing and disposing of firearms and ammunition, including the training of gun users to avoid injury, illness, or death.</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Gun Violence</td>
<td>Violence committed with the use of a gun (i.e., including homicide, assault, suicide).</td>
</tr>
<tr>
<td>Machine Guns</td>
<td>Any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot without manual reloading, by a single function of the trigger.</td>
</tr>
<tr>
<td>Mass Shooting</td>
<td>Multiple, firearm, homicide incidents, involving 4 or more victims at one or more locations close to one another.</td>
</tr>
<tr>
<td>Open Carry</td>
<td>Openly carrying a firearm in public, where it can be seen by the casual observer (i.e., outside the waistband holster).</td>
</tr>
<tr>
<td>Responsible Gun Ownership</td>
<td>Responsibility for being educated on the risks associated with guns and the best practices for storing guns securely (i.e., firearm safety training).</td>
</tr>
<tr>
<td>Silencers</td>
<td>A device used to reduce the sound of a gun as it is fired.</td>
</tr>
<tr>
<td>Ghost Guns</td>
<td>A privately made DIY firearm that lacks commercial serial numbers, can be purchased by anyone without a background check, and cannot be traced if used in crime.</td>
</tr>
<tr>
<td>Safe Storage</td>
<td>Securing guns in a safe, unloaded and separate from ammunition to prevent unauthorized users, including children, from accessing and using those guns.</td>
</tr>
</tbody>
</table>
Resources for Employee Resource Groups
Companies have made public commitments to support their employees’ mental health. Nearly 2/3 of gun deaths are suicides.

Companies are recognizing their responsibility to support employees experiencing domestic violence. In an average month, 53 American women are shot to death by an intimate partner, and the risk of death is 5x greater when a gun is present.

Gun violence disproportionately impacts lower-income communities. Businesses support community development through their foundations, volunteer hours, and other community engagement efforts.

Existing Employee Resource Groups can work to address gun violence with their members

ERGs may already be working to address other issues intricately linked to gun violence, such as mental health and domestic violence.
Resources for Employee Resource Groups

Employee Resource Groups (ERGs) can play an important role in raising awareness amongst employees on gun violence, supporting victims, and working with company leadership to ensure a value chain free of gun violence. Some ERGs may already be talking about issues related to gun violence, such as mental health and domestic violence.

ERG Activities and Resources

- Advocate for your company to move to a guns free 401(k) using As You Sow’s Free Action Toolkit.
- Hold a safe gun storage training with an external provider.
- Share resources on safe storage and gun safety education from external organizations if needed, such as safe gun storage, BEsmart For Kids, One Thing You Can Do which provides state-specific information.
- Participate in National Gun Violence Awareness Day (June 4) and Wear Orange to demonstrate support for the gun violence prevention movement.
- Hold a fundraising campaign for a gun violence prevention organization such as those mentioned on slide 83.
- Advocate for your employer to use the Toolkit for Corporate Action to End Gun Violence to ensure their value chain is free of gun violence.
Everytown for Gun Safety is the largest gun violence prevention organization in America. It was started in 2013 by Mayors Against Illegal Guns and Moms Demand Action for Gun Sense in America to end gun violence. Everytown combines research, policy, litigation, advocacy, and grassroots organizing to grow growing into a movement of more than 8 million supporters.

Learn about Everytown for Gun Safety’s on their [website](#).
- See how [business has taken action](#) to promote gun safety.
- Learn about the [economic cost of gun violence](#) in the United States.
- Find out more about how gun violence impacts the communities you care about [here](#).
- Check out the [Gun Law Navigator](#), the largest historical database of modern U.S. gun laws dating back to 1991, compare the strength of state gun laws, track trends over time, and identify gaps in the gun laws in your state.

Check out [Moms Demand Action](#), grassroots movement of Americans fighting for public safety measures that can protect people from gun violence. They pass stronger gun laws and work to close the loopholes that jeopardize the safety of families. They also work in communities and with business leaders to encourage a culture of responsible gun ownership.
Additional Gun Safety Policy & Advocacy Organizations

The Coalition to Stop Gun Violence – a coalition of 47 organizations working together to secure freedom from gun violence through research, strategic engagement and effective policy advocacy.

The Brady Campaign strives to “create a safer America for all of us that will lead to a dramatic reduction in gun deaths and injuries.” They are aiming to cut the number of U.S. gun deaths in half by 2025 by focusing on background checks, stopping ‘Bad Apple’ gun dealers, and voicing the dangers of keeping guns in the home.

States United to Prevent Gun Violence – an affiliation of 30 state gun-violence-prevention groups working to make communities safer through common sense laws and anti-violence education.

Giffords – an organization dedicated to saving lives from gun violence. Led by former Congresswoman Gabrielle Giffords, we inspire the courage of people from all walks of life to make America safer.
BSR™ is a global nonprofit organization that works with its network of more than 250 member companies and other partners to build a just and sustainable world. From its offices in Asia, Europe, and North America, BSR™ develops sustainable business strategies and solutions through consulting, research, and cross-sector collaboration.

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