



September 22, 2017

The Honorable Jay Clayton
Chairman
U.S. Securities and Exchange Commission
110 F Street, N.E.
Washington D.C. 20549

Re: **Human Capital Management (HCM) Disclosures Rulemaking Petition**
File 4-711 – 07/06/2017

Dear Chairman Clayton,

We are writing in strong support of the [Human Capital Management Petition](#) filed with the U.S. Securities Exchange Commission (SEC, Commission) by the [Human Capital Management Coalition](#) on July 6, 2017. The Interfaith Center on Corporate Responsibility (ICCR) is a coalition of more than 300 faith- and values-driven institutional investors collectively representing over \$400 billion in invested capital. For over four decades, we have engaged hundreds of multinational corporations on a host of environmental, social and governance topics in order to promote improved long-term financial performance and greater sustainability. As such, ICCR members underscore the importance for companies of meeting investor requests for the disclosure of meaningful information beyond current financial reporting requirements. We believe more robust human capital disclosures would assist investors in evaluating risk, and would help companies in evaluating operations, mitigating risk, and creating long-term value.

As long-term investors, we have seen the value of providing investors with an improved ability to ascertain information important to their investment decisions. We also recognize that the “Material risks related to human capital management can create substantial risks for companies and investors, damaging corporate reputation, generating legal liabilities and undermining relationships with key stakeholders.”¹ Investors need more complete information on human capital management to adequately assess the performance of the companies they own and hold boards accountable for oversight of the legal, reputational, and financial risks related to human capital management. Greater transparency would allow investors to more efficiently direct capital to its highest-value use, thus lowering the cost of capital for well-managed companies. Developing consistent and comprehensive standards would give investors the best “window” into a company’s performance and future prospects (both HCM performance and overall performance).

¹ HCM Petition filed with the SEC, page 4 and 8, July 6, 2017 <https://www.sec.gov/rules/petitions/2017/petn4-711.pdf>

We join the Human Capital Management Coalition in believing that guidance by the SEC on human capital management can help stakeholders gain a fuller understanding of a company's business model, strategies and conditions for value-creation not only in the short-term but more importantly in the long-term.

We also recognize that some disclosure requirements may need to be tailored to specific industries or individual companies, but support the petition's listed categories of information, agreeing that they are vital to human capital analysis and should be required. The petition lays out nine such categories: workforce demographics; workforce stability; workforce composition; workforce skills and capabilities; workforce culture and empowerment; workforce health and safety; workforce productivity; human rights; and workforce compensation and incentives.

Thank you for the opportunity to share our support of this petition requesting rulemaking on better disclosures on a publicly listed company's most important asset, its human capital.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Josh Zinner
Chief Executive Officer
Interfaith Center on Corporate Responsibility