

20 November 2017

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

Dear Chairman Clayton,

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

I am writing on behalf of the Australian Council of Superannuation Investors (ACSI) in support of the Human Capital Management Petition filed with the U.S. Securities Exchange Commission (SEC, Commission) by the Human Capital Management Coalition (HCMC) on 6 July 2017.

By way of background ACSI represents 37 Australian and international asset owners and institutional investors with combined assets under management of AUD\$1.6 trillion. A significant proportion of these investments are made in the US equity market and the corporate disclosure standards in US companies are therefore of material interest to Australian investors.

ACSI believes that it is critical that companies properly disclose their performance in relation to material environment, social and governance (ESG) issues which ultimately impact shareholder value.

We strongly support the HCMC Petition's request for robust human capital disclosures and believe that the petition provides the SEC with a thoughtful resource for further exploration of the need for enhancements to human capital disclosures.

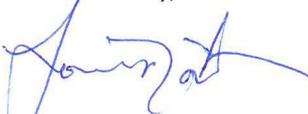
We believe guidance by the SEC on HCM disclosure can help investors and other stakeholders gain a better understanding of a company's business model, underlying strategy and conditions for value-creation not only in the short-term but more importantly in the long-term.

ACSI supports the HCMC non-prescriptive approach and the contention that improved human capital disclosures are an important input into analysis and provide the starting point for a dialogue. We support the recommendation that in creating any new disclosure requirements the Commission would need to "find the appropriate balance" between specific rules-based quantitative information that provides for some level of consistency and comparability and more principles-based qualitative information that provides the context for understanding how human capital management benefits long-term shareowner value.

We also agree that the Commission should "solicit input from all affected constituencies, with an emphasis on the needs of investors, to identify the matters on which disclosure would be most useful."

Thank you for consideration of our views. If we can answer any questions or provide additional information, please do not hesitate to contact me at [REDACTED].

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Louise Davidson', is written over a white background.

Louise Davidson
CEO

Australian Council of Superannuation Investors