



October 19, 2017

Brent Fields, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC

RE: Rulemaking petition to require issuers to disclose information about their human capital management policies, practices and performance (File # 4-711)

Dear Mr. Fields:

I write on behalf of JUST Capital, an independent 501(c)(3) nonprofit organization that provides analysis and rankings on how corporations perform on the things that matter most to the American public. Since 2015 our organization has conducted extensive and detailed market research on the American public's attitudes toward corporate behavior. These unique surveys, which collected data on a census-balanced group of over 50,000 Americans, found that environmental, social, and governance performance was essential to the American public's definition of JUST business.

In our surveys of the American public, issues of worker pay and treatment are among the most important considerations to properly assess corporate sustainability performance. Our work shows that more than three-quarters of respondents say that fair pay and benefits were critical characteristics of a JUST company. We found that over 80% identified paid time off (including maternity & paternity leave), equal pay by gender, opportunities for flexible work hours, a culture fostering a safe work environment, and education & training programs as just some of the issues critical to evaluating the companies they want to invest in, work for, and do business with. Unfortunately, the amount and quality of data relating to these issues is often incomplete or inconsistent.

Our work shows unequivocally that the American public believes in corporate transparency; a full 91% of our survey respondents said that measuring how corporations perform on such issues is important. As an organization dedicated to empowering the public with meaningful market information, we view the rulemaking petition submitted by the Human Capital Management Coalition (HCM Coalition) calling for listed companies to be required to disclose information on human capital management, practices and performance as an essential step to providing ordinary investors with the information they need to properly assess corporate performance.

The SEC's purpose is to protect ordinary investors by requiring full and accurate financial disclosure by companies. We believe that standardized reporting on corporate sustainability matters is entirely consistent with this mission and we welcome your leadership on the issue.

Respectfully,

A handwritten signature in black ink, appearing to read "Martin Whittaker".

Martin Whittaker
CEO, JUST Capital