



December 12, 2018

Hon. Jay Clayton
Chairman
U.S Securities and Exchange Commission
100 F Street, N.E
Washington, D.C 20549

Re: File 4- 725—Staff Roundtable on the Proxy Process

Dear Chairman Clayton,

The Missionary Oblates of Mary Immaculate are a religious order in the Roman Catholic tradition with over 4,000 members and missionaries in more than 65 countries throughout the world. We are also members of the Interfaith Center on Corporate Responsibility (ICCR), a coalition of 300 faith-based and socially responsible institutional investors – Protestant denominations, Catholic Religious orders, Jewish agencies, pension funds, SRI firms, healthcare corporations, foundations, publishing companies and dioceses – whose combined assets exceed \$100 billion.

As faith-based investor, we write to you to express strong support for the letter sent to your office by Interfaith Center on Corporate Responsibility (ICCR) dated November 6, 2018 in which they affirm the current shareholder proposal process. The history of Interfaith Center on Corporate Responsibility (ICCR) demonstrates literally hundreds of examples of companies changing their policies and practices in light of constructive engagement with shareowners, including the filing of resolutions.

The current shareholder proposal process has served as an invaluable tool to both shareholders and companies to bring to light emerging risks and facilitate the mitigation before they result in negative consequences.

Thank you for your attention to this critical issue.

Sincerely,

A handwritten signature in black ink that reads 'Sèamus Finn' followed by 'o.m.i.' in smaller letters.

Rev. Sèamus Finn, OMI
Chief of Faith Consistent Investing
OIP Investment Trust
Missionary Oblates of Mary Immaculate