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June 14, 2021

Ms. Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Re: Request for Public Comment on Climate Disclosures

Via Electronic Submission: (rule-comments@sec.gov):

Dear Ms. Countryman:

As You Sow (AYS) respectfully submits the following responses to the Securities and Exchange Commission's (SEC or Commission) Request for Public Comment on Climate Disclosures issued March 15, 2021. We strongly support efforts to revisit the Commission's 2010 Interpretative Guidance on Climate Change (2010 Guidance) and address the appropriateness of adopting mandatory disclosure requirements to address climate change within the disclosure framework articulated for Regulation S-K, Regulation S-X, and Form 20-F for foreign issuers where appropriate.

As You Sow (AYS) is a national leader in shareholder advocacy and is dedicated to increasing environmental and social corporate responsibility. Since 1992, we have engaged in corporate dialogue, coalition building, and innovative legal strategies to further a safe, just, and sustainable world. Our commitment to corporate accountability is founded on the belief that environmental stewardship and human rights are essential to informed corporate decision making that enhances shareholder value.

Reliable, comparable, and decision useful information is essential to investor decision making. We rely on the growing body of scientific and economic data documenting the financial benefits of incorporating environmental and human rights considerations into corporate decision making. When that data is not readily accessible, we invest time and resources to actively engage corporations and request material information to inform our voting and investment decisions. We similarly ask companies for assessments of, strategies around, and responses to climate change to determine if and how carbon asset risk, climate transition risks, and climate impact have been incorporated in corporate decision making. While we have achieved progress in aligning corporate actions with climate realities over the years through the shareholder engagement process, investors and the markets now need a mandatory climate disclosure regulatory framework that only the Commission can provide.

Overview

We strongly support the Commission's efforts to address public disclosure requirements for material climate related data and environmental, social, and governance practices ("ESG"). As investors we are increasingly concerned that the absence of a mandatory disclosure regime will continue to frustrate our efforts to access reliable information to monitor risk across our portfolios and to inform our voting and investment decisions. We believe that a comprehensive mandatory disclosure regime will remedy a number of inconsistencies and weaknesses in the quality and relevance of disclosures from registrants. We also believe that a mandatory framework will provide registrants with the tools to avoid making misleading disclosures that confuse investors and could trigger the fraud provisions under federal securities law. We also note that the lack of quality data frustrates the ability of registrants to assess relevant supply chain emissions; of financial institutions to fully assess risk and make informed capital allocation decisions; and even of public officials from understanding climate risk and progress or lack thereof, to name just a few critical uses for climate-related disclosures.

Principles-based climate disclosure has not been sufficient to meet investor needs. Performance targets and criteria we once considered in selecting investments are no longer sufficient for our decision making. Climate risk in all its forms — physical risk, regulatory risk, competitive risk, and systemic economic risk — is investment risk. Relevant, reliable, and high-quality quantitative and qualitative disclosure about climate change is now essential, but is not being provided in a consistent or comparable manner.

While the majority of market participants are beginning to change their operations and strategies in some ways to align with global goals to reach net zero emissions by 2050, many are not, and many more are not doing so comprehensively. Only a small percentage of companies are acting at the speed and rate shown necessary by science to avert the growing risks of a warming climate. Companies that continue to operate in a business as usual manner, despite growing climate concern, will be assuming a far higher degree of risk in their business operations than a decade ago. Given what we, and a growing consensus of economists, analysts, and global financial regulators know now about the current and foreseeable economic and financial impacts of climate change, the current gaps in disclosure regulation pose material risk to investors.

Although the SEC's 2010 Guidance on Climate Risk Disclosure ("2010 Guidance") acknowledged the need for registrants to disclose material climate related information, this principles-based reporting approach provided registrants broad discretion on the type and quality of climate related information to be reported. This guidance has not engendered sufficient compliance. Investors have found disclosures lacking in the quality, detail, and relevance necessary to sufficiently inform investment and voting decisions.

Under the 2010 Guidance, the primarily large registrants that do produce some form of climate related disclosure generally do so in non-audited documents. The information is often qualitative and neither comparable, nor underpinned with clearly stated assumptions or methodologies. Industries like transportation, agriculture, forestry, food, technology and media have among the lowest rates of disclosure among large companies.[1] Smaller and midsize registrants often do not include any disclosure at all. As a result, disclosures vary widely, ranging from vague boilerplate statements to more detailed statements lacking the kind of fact-based, data driven information investors need. Furthermore, disclosures rarely include insights into management's decision making about how it reached its

[1] See the Task Force on Climate Related Financial Disclosures 2019 Status Report available at https://assets.bbhub.io/company/sites/60/2020/10/2019-TCFD-Status-Report-FINAL-0531191.pdf .

conclusions or how the disclosed information impacts the company's strategy or operations. Gaps and inconsistencies in disclosure create barriers to shareholders' effective risk analysis and decision making.

Over the last decade shareholders have tried to bridge this disclosure gap through shareholder engagement and, where engagement has proved ineffective, the filing of proposals. In the face of growing climate risk, shareholders have accelerated engagement with companies, primarily through the annual proxy season, to compel more detailed information from management. Despite the resources expended in engaging corporate management to provide greater clarity in disclosures, we cannot step into the shoes of the Commission to achieve comparability across all sectors and industries.

The Current Regulatory Regime is Insufficient to Support the Fiduciary Duty Owed to Beneficiaries

Our ability to select and monitor investments in good faith is severely hampered under the current disclosure regime. For institutional investors charged with managing pension and retirement funds, the inability to rely on climate and sustainability assertions with confidence undermines the exercise of fiduciary duty owed to beneficiaries of those funds. The scope and scale of climate related physical and transition risks will transform the ways companies operate, assets are valued, and how investors select companies to manage portfolios. It has become increasingly difficult to act with due care as a reasonable investor, and thoughtfully consider foreseeable risks and costs associated with climate change, without comprehensive and meaningful climate related disclosures.

Fiduciaries need timely action from the Commission to engage in due diligence and monitor investments in a manner consistent with the duty of care owed to their beneficiaries. Fiduciaries recognize that how management responds to current and projected climate challenges and opportunities in the near and long term informs whether management's conduct is consistent with investment criteria and performance metrics that create durable value. As detailed below in our recommendations, a comprehensive, mandatory climate disclosure regime will provide investor fiduciaries with the tools needed to act in the best interests of their beneficiaries.

The Current Regulatory Regime Does Not Protect Investors from False and Misleading Disclosures

Under the '33 and '34 Act, the Commission is charged with protecting investors from the risk of financial loss attributed to fraud and market instability. A hallmark of that responsibility includes ensuring that investors have a steady flow of timely, comprehensive, and accurate information. We are increasingly concerned with the wide variety of frameworks that registrants use at their discretion, and the number of platforms registrants use to disclose information, including websites, sustainability reports, third party platforms, social media, etc. Registrants are prone to producing a multitude of statements that have become increasingly confusing rather than clarifying to investors.

The tendency toward making assertions and claims that overstate the environmental or climate integrity of operational processes and products also threatens the reliability of registrant statements. There are too often disparities between the substance and assertions made in sustainability reports and the assertions made in the annual 10-Ks and other periodic filings.

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To address these concerns, we support clear and explicit direction from the Commission about how and where registrants should provide climate-related information, with comprehensive climate disclosure rules to enhance the comparability of data, both in substance and form.

The existential nature of the climate crisis is creating an economic transition of massive scale and speed. By quickly providing a clear and comprehensive, mandatory climate disclosure regime with explicit instruction regarding the form and substance of disclosures, the SEC can help ensure an orderly and timely transition, spurring increased analysis and accountability on the part of registrants while providing sufficient information for shareholders to make reasoned and informed decisions while navigating this period of rapid transition.

A Comprehensive Climate Disclosure Rulemaking is within the Commission's Authority.
Mandating a comprehensive climate regime is consistent with the Commission's mission to protect investors; ensure fair, orderly and efficient markets; and facilitate capital formation. The rulemaking and prescriptive measures detailed in the sections below are consistent with recent undertakings by the Commission. The Modernization of Oil and Gas Reporting[2] and the Modernization of Property Disclosures for Mining Registrants[3] represent two recent examples of rulemakings where the Commission adopted prescriptive measures to modernize disclosures and adopted stakeholder recommendations to: (1) conform SEC rules to internationally recognized standards, (2) reflect definitions concerning the volatility in pricing (oil and gas) and recoverability of reserves and resources (minerals) that had a material effect on the calculation of asset value and in turn access to capital for registrants, and (3) foster consistency between disclosures of different companies. Commenters reflected that prior to these rules, U.S. based registrants were out of step with global competitors that were registered in countries with more favorable definitions of resources and reserves.[4] In both instances, the final rules were prescriptive about how and where to disclose material information aligned with industry standards and provided registrants with clear and prescriptive measures for disclosure. With the Commission's intervention, investors now have more accurate information about management's strategies for asset development, operations, and capital expenditures.

In the instant case, we encourage the Commission to adopt a similar approach that updates the current Climate Guidance with a mandatory disclosure regime that clarifies and harmonizes industry recognized terminology and globally recognized frameworks concerning climate related risk, strategies to mitigate those risks, and the data and metrics to assess registrants' progress in managing climate risk and mitigation.

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[2] See Modernization of Oil and Gas Reporting, Release Nos. 34-59192; FR-78, File No.: S7-15-08 available at https://www.sec.gov/rules/final/2008/33-8995.pdf.
[3] See Modernization of Property Disclosures for Mining Registrants, Release Nos. 33-10570; 34-84509; File No. S7-10-16 available at https://www.sec.gov/rules/final/2018/33-10570.pdf.
[4] See Comments from the Society for Mining, Metallurgy & Exploration to the Commission, Amendment to Industry Guide 7 – Petition for Rulemaking, October 1, 2012, noting that under the prior rule, the net effect is that Canadian companies, even if they are U.S. domestic issuers (i.e. not foreign private issuers), are allowed to report Measured, Indicated and Inferred Resources in their SEC filings, while all U.S. incorporated issuers (and other non-Canadian foreign issuers) are prohibited from disclosing such information in their SEC filings," available at https://www.sec.gov/rules/petitions/2012/petn4-654.pdf. The Final Rule issued in 2018 addressed concerns raise in the comments. With the rate of global regulatory changes to address climate disclosure, we are concerned that delayed rulemaking in the U.S. over a period of years will worsen gaps and market deficiencies.

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The Current Principles-based Approach Does Not Provide U.S. Financial Regulators with the Tools to Ensure Market Stability. A mandatory climate disclosure rulemaking is also consistent with the Commission's role as a global partner in financial regulation and market stability. There is broad consensus among global regulators that disclosure is a critical part of risk management. However, in the U.S., under the current voluntary and principles-based disclosure regime, stakeholders, and particularly financial regulators charged with identifying threats to economic stability, cannot reliably identify potential sources of systemic disruptions due to the uneven and unclear state of disclosures.

Under federal securities laws the SEC has broad authority to fulfill its mandate of furthering investor and economic protection. As a participating member of the Financial Stability Oversight Council (FSOC) established under Dodd-Frank, the SEC is charged with working with a council of U.S. financial regulators to identify, respond, and manage emerging risks to ensure economic stability. A recent report ("CFTC report") by the Commodities Futures Trading Commission (CFTC), a member agency of the FSOC, noted that the current climate disclosure regime is not sufficient to assist regulators with identifying market participants that are vulnerable to abrupt responses to climate related policies. For example, the CFTC report noted that major shifts in climate policy or a shift in perceptions about the likelihood of such a policy change could trigger an abrupt downturn in revenues and valuations. The CFTC report also distinguished between macro-economic stresses that can evolve over time versus changes in policy making, consumer preferences, technologies, and investor driven climate preferences as potential sources of those abrupt changes. Among its recommendations, the CFTC noted that under the current voluntary framework, the reporting on climate change has been so uneven that it creates impediments for regulators to identify, evaluate, or manage financial and market risks.[5]

In addition to the transition risks described above, regulators are also increasingly concerned with the risk of destabilizing disruptions attributed to the physical impacts of climate related weather events. In an Economic Letter from the Federal Reserve Board of San Francisco regulators have identified the ongoing trend of higher temperatures and more extreme weather attributed to climate change.[6] The uncertainty about the severity and timing of losses attributed to these changes have been identified as the kinds of foreseeable risks that should be recognized among regulators charged with maintaining the safety and soundness of the individual financial systems and the stability of the overall financial system.[7] Regulators are reliant on sound climate-related information to monitor, assess, and address these growing risks and avoid losses that could have a destabilizing effect across the financial system.

We echo the conclusions of the CFTC report that regulatory action by the Commission is required to address climate disclosure reporting gaps. We believe these deficiencies can be remedied with a comprehensive and mandatory disclosure framework.

Summary of Recommendations

[5] See Climate Related Market Risk Subcommittee under the Market Risk Advisory Committee, April 14, 2020, (CFTC report) available at https://www.federalregister.gov/documents/2020/04/14/2020-07860/climate-related-market-risk-subcommittee-under-the-market-risk-advisory-committee.

[6] See Federal Reserve Board of San Francisco, (FRBSF) Economic letter available at https://www.frbsf.org/economic-research/publications/economic-letter/2021/february/climate-change-is-source-of-financial-risk/

[7] Id.

As You Sow is part of a coalition of investors, the Climate Action 100+ ("CA100+"), an initiative with over 575 investors representing $54 trillion in assets that formed to address climate change and the lack of clear commitments by registrants to cut emissions, improve climate governance, and strengthen climate-related financial disclosures. The Climate Action 100+ Net Zero Company Benchmark ("Net Zero Benchmark" or "Benchmark") assesses the world's largest corporate greenhouse gas emitters on their progress in the transition to a net zero economy.[8] The coalition identified foundational principles, standards, and information investors need from registrants for useful decision making. The Benchmark includes a series of indicators that itemize the categories of decision-useful information for investors assessing climate related governance practices, metrics, targets, and short, medium and long-term time-frames for achieving those targets. The Benchmark is intended to allow an assessment of the robustness of companies' business plans against a range of climate scenarios and improve investment decision-making. The Benchmark also provides a basis for comprehensive climate disclosure rulemaking that reflects years of thoughtful consideration by global investor coalitions about what information constitutes material climate related information. We are encouraged that many of the recommendations included in the TCFD's Proposed Guidance on Climate-Related Metrics, Targets and Transition Plans are consistent with the principles, approach and indicators in the Benchmark.[9]

We recommend that the Commission adopt a mandatory climate disclosure framework for all registrants modelled on the CA100+ investor developed framework which identifies clear, comparable, and decision useful data that shareholders need to assess companies' climate risk and response. Such a mandatory climate disclosure regime would provide investors, management, financial regulators, and policy makers with a basic set of necessary information to protect investors, ensure market integrity, and provide registrants with clear direction. The following recommendations reflect our primary concerns and are reiterated in the itemized responses to the Commission's questions below.

Provide Comprehensive and Mandatory Climate Change Disclosure Framework. We strongly recommend that the Commission adopt a comprehensive mandatory disclosure framework for all registrants. Since the release of the 2010 Guidance, registrants have been grappling with how to define climate change risk and respond in a manner that is relevant to business operations and responsive to investor requests for information about how a corporation assesses and is acting on climate risks, if at all. A mandatory disclosure framework will eliminate the guesswork for registrants in deciding whether to disclose material and relevant climate related information, how to do so, and where to provide that information in its periodic filings.

This mandatory disclosure framework should include explicit recommendations about fact-based, quantitative data that is relevant to the operations of the company and provides investors with the tools to make assessments about performance. Disclosure should also include qualitative data that includes management's policies and strategies and insights about how management reached its decisions. We

[8] The coalition of global investor networks contributing to the Net Zero Benchmark include the Asia Investor Group on Climate Change (AIGCC), Ceres, Investor Group on Climate Change (IGCC), Institutional Investors Group on Climate Change (IIGCC) and Principles for Responsible Investment (PRI).

[9] The Task Force is expected to release the final guidance in the fall of 2021. See TCFD, "Proposed Guidance on Climate-Related Metrics, Targets, and Transition Plans," available at https://assets.bbhub.io/company/sites/60/2021/05/2021-TCFD-Metrics_Targets_Guidance.pdf.

recommend that the Commission adopt explicit direction about how and where to disclose both quantitative and qualitative data to improve uniformity in periodic filings. We believe that these efforts will go a long way toward providing investors with greater comparability in the format of disclosures.

Adopt the TCFD Framework. We strongly support the Commission's continued active role in working with global financial regulators to harmonize U.S. disclosure standards and taxonomy with emerging global standards in climate disclosure. For the last decade global networks of regulators, investors, asset managers, credit rating agencies, insurers and other market participants have worked to develop voluntary disclosure frameworks and, since 2017, implement the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD) to articulate industry and sector specific sources of climate related financial risks and opportunities. The TCFD's recommendations have been embraced by coalitions of global investor groups and incorporated in the regulatory frameworks of nation-states that are delivering on commitments to reduce greenhouse gas emissions under the Paris Agreement. The eleven (11) recommendations of the TCFD provide a much needed starting point for identifying, measuring, and assessing physical risk and transition risk exposure.

Require All Industries to Disclose Scope 1, 2, and 3 Emissions: Publicly traded companies of all sizes and from all sectors should be required to disclose their full scope of operational, supply chain, and product-related emissions. Disclosures of such emissions is the most basic starting point for assessing climate and carbon related risk, however large or small, and the progress registrants are making in addressing emission reductions at the scope and rate necessary to meet global climate goals .

This data is critical not only to investors, but to registrants charged with assessing and disclosing their full range of greenhouse gas emissions, including supply chain emissions. Banks and other financial system participants need such data to assess and reduce climate-related risk exposure and reduce their own contributions to climate change. Regulators and policy makers must have reliable emissions data on which to make sound policy decisions. All companies and industries collectively contribute to the climate problem and so must provide this most basic set of information from which all sound decision making must flow.

Provide a Clear Statement Concerning the Materiality of Climate Related Information. The complexity of measuring, managing, and evaluating climate risks, opportunities, strategies and management's consideration of such, calls for a framework that articulates a legal obligation to disclose material information to investors followed by a clear set of standards to provide much needed comparability.

How corporate boards and management identify, assess, and respond to sources of physical, transition, and litigation risk will trigger questions about the prudent exercise of corporate fiduciary duty and the sufficiency of due diligence, the engagement of gatekeepers, including auditors and audit committees, and their appropriate exercise of fiduciary duty in light of those risks. We strongly support a clear statement on materiality that assists registrants with disclosure to direct the board and management in the prudent exercise of fiduciary duty owed to investors.

A broad and inclusive statement about the materiality of climate change will also help eliminate any questions or uncertainty about how the Commission defines material climate related information. We share the concerns outlined by Commissioner Allison Herren Lee about unduly limiting the scope of materiality with respect to climate and that Regulation S-K has and can require the reporting of information "that is important to investors but may or may not be material in every respect to every company making the disclosure."[10]

Despite the scale and scope of the global shift to a net zero economy, efforts to address a mandatory climate disclosure regime in the recent past continues to face resistance.[11] We support explicit statements about the firm specific and systemic climate related financial risks With over 192 countries actively participating in the Paris Agreement, a global transition to net zero emissions by 2050, the scientifically established threshold necessary to keep global warming well below 2°C, has begun.[12] As BlackRock CEO, Larry Fink, stated, "Climate risk is investing risk…There is no company whose business model won't be profoundly affected by the transition to a net zero economy."[13] How corporate boards and management identify, assess, and respond to sources of physical, transition, and litigation risks will trigger questions about the prudent exercise of a corporate fiduciary duty. How the board and management responds to climate related risks raises questions about the sufficiency of due diligence, the engagement of gatekeepers including auditors and audit committees, and their appropriate exercise of fiduciary duty in light of those risks. We strongly support a clear statement on materiality that assists registrants with disclosure to direct the prudent exercise of fiduciary duty owed to investors.

We recommend that the Commission provide explicit language that directs registrants to disclose climate related information that is: (1) responsive to the recommendations of the TCFD and includes scenario analysis testing; (2) provides disclosure of the full range of a company's greenhouse gas emissions; (3) includes alignment with targets based in science and explicit short, mid-term and long term greenhouse gas reduction goals to achieve them; (4) discloses statements of management strategies and capital allocation aligned with climate goals; and, subject to Commission enforcement under federal securities laws, (4) will eliminate any doubt in the minds of registrants, investors, and regulators about how boards and management are responding to the present and foreseeable risks and opportunities that climate change presents.

Coordinated Regulation is Essential for Market Integrity. We strongly support the Commission's efforts to work with global peers to develop comprehensive and mandatory climate risk disclosure standards to ensure that material market data is comparable, reliable, and accessible. A growing number of U.S. registrants, particularly those entities that are dual listed or with substantial operations in jurisdictions with emerging disclosure regimes are currently, or will be, subject to climate disclosure and due diligence requirements initiated by a number of foreign jurisdictions. For example, the EU is currently developing

[10] See Speech, Commissioner Allison Herren Lee, "Living in a Material World: Myths and Misconceptions about 'Materiality', May 24, 2021 available at https://www.sec.gov/news/speech/lee-living-material-world-052421.
[11] See Public Statement on Proposed Amendments to Modernize and Enhance Financial Disclosures, Commissioners Hester M Peirce, January 30, 2020 available at https://www.sec.gov/news/public-statement/peirce-mda-2020-01-30 .
[12] See NDC Registry (interim) available at https://www4.unfccc.int/sites/NDCStaging/Pages/All.aspx.
[13] See Blackrock CEO Larry Fink letter to CEO's, 2021 available at https://www.blackrock.com/corporate/investor-relations/larry-fink-ceo-letter.

legislative measures to implement its Sustainable Corporate Governance Initiative that will have a direct impact on non-EU actors, including U.S. registrants that sell goods and services within the EU.[14]

Global legislative measures are expected to include mandatory due diligence and corporate accountability requirements for corporate related climate, environmental, human rights and governance issues. Without a comparable regulatory regime in the United States, with due consideration to certain structural differences, U.S. registrants will face increasing exposure to liability risk for disparities in reporting across multiple jurisdictions. Investors may interpret disparities, such as lesser reporting in the U.S., as misstatements of material information or even as misstatements triggering the fraud provisions under U.S. federal securities law. A mandatory disclosure regime that is coordinated with global standards in taxonomy and targets would likely mitigate the risk of shareholder litigation by eliminating the uncertainty caused by material omissions. We recommend that the Commission establish clear and comprehensive standards to drive greater comparability among registrants and to foster needed transparency about climate related risks so that regulators can identify potential sources of risk that could undermine systemic financial stability.

A significant number of governmental bodies are formalizing, or have already adopted, mandatory disclosure and regulatory frameworks to create enforceable mechanisms to achieve science based targets aligned with the emission reduction goals of the Paris Agreement. Global financial regulators, many of whom are members of the Network of Central Banks and Supervisors for the Greening the Financial System (NGFS), are actively working to strengthen the global response to the Paris Agreement goals while coordinating the role of the financial system in managing risk and mobilizing capital for investment in the low carbon technologies needed to facilitate the transition to a net zero economy.

The sources of a registrant's greenhouse gas emissions in the course of operations is a critical factor in determining whether or not that entity can continue to operate under a business as usual scenario given expanding regulatory requirements to curtail emission levels by explicit timeframes. Under the foreseeable and globally coordinated short, mid-term, and long term targets for emission reductions, these regulatory regimes will directly and indirectly influence the asset valuations and asset retirement obligations, capital expenditures, and cash flows, among other financial considerations, of nearly every sector of the economy. A mandatory disclosure regime ensures that all entities engage in an assessment and disclosure process that protects investors and facilitates transparent and efficient markets.

Responses

Question 1

How can the Commission best regulate, monitor, review, and guide climate change disclosures in order to provide more consistent, comparable, and reliable information for investors while also providing greater clarity to registrants as to what is expected of them? Where and how should such disclosures be provided? Should any such disclosures be included in annual reports, other periodic filings, or otherwise be furnished?

[14] As of April 30, 2021, the public consultation process is underway with a number of stakeholders weighing in on the scope and breadth of the proposed regulations. See Commission Delegated Regulation (EU) 2020/852 available at https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800_en.pdf.

We support the Commission's efforts to adopt a mandatory framework that provides clear and prescriptive direction to registrants and provides the Commission with the necessary tools for regulatory enforcement to ensure consistency, comparability, and integrity in disclosure reporting.

We strongly support a mandatory disclosure regime that designates a specific sub-part within Regulation S-K for registrants to disclose climate related information. We believe it is critical that the designated area be related specifically to climate and is separate and apart from sections of Regulation S-K that were referenced in the 2010 Guidance including, Items 101 (description of business that includes certain costs associated with compliance of environmental laws) and Item 103 (legal proceedings that include environmental litigation).[15] Should the Commission adopt the recommendations of the TCFD, compliance with the TCFD's elements should also be distinguished from the environmental information that is traditionally disclosed in these sections due to the more existential and nuanced aspects of climate change risks and opportunities as discussed below.

As mentioned earlier, the complexity and scope of climate related information (including reporting of the full range of sources of greenhouse gas emissions; considerations of short, mid-term, and long term science based targets; assessments of risk including scenario analyses; and reporting of aligned business and capital plans) exceeds the complexity of the kind of traditional environmental disclosures typically provided by registrants in these subparts. Designating an explicit subpart within Regulation S-K will assist registrants with explicit instructions about where and how to make climate related disclosures and will contribute to greater comparability in the structure of disclosures. An explicitly designated subpart devoted to climate related information will also place material information in a consistently located part of the periodic filings that allows investors to easily locate pertinent information.

We additionally support explicit instruction from the Commission concerning the incorporation of climate related information as a part of Item 303 of Regulation S-K, known as the Management's Discussion and Analysis of Financial Condition and Results of Operations or MD&A. Under federal securities law the MD&A requirements are intended to: (1) provide a narrative explanation of a registrant's financial statements that enables investors to gain insights about management's thinking; (2) enhance financial disclosures and provide the context within which financial information should be analyzed, and (3) provide information about the quality of and potential variability of a registrant's earnings and cash flow as an indication of past and future performance.[16] Management's disclosures provide critical information to investors concerning a registrant's thinking and strategy and can assist investors with discerning whether or not management is positioned to respond to a variety of risks and opportunities. Although the Commission did not include any discussion of climate related data in the Modernization of Regulation S-K's discussion of the MD&A, we strongly support efforts to revisit these provisions and include guidance about how a registrant can best articulate the narrative explanation concerning how management perceives its climate related risk exposure and how it anticipates such risks may impact operations.

[15] See SEC 2010 Interpretative Guidance on Climate Risk Disclosure available at https://www.sec.gov/rules/interp/2010/33-9106.pdf.

[16] See Release No. 33-6835 (May 18, 1989) [54 FR 22427] (the "1989 Release") and Release No. 33-8350 (December 19, 2003) [68 FR 75055] (the "2003 Release") for detailed histories of Commission releases that outline the background of, and interpret, our MD&A rules.

<u>Enforcement</u> - We also support continued robust and periodic assessment and enforcement of the Commission's mandatory disclosure framework. A 2013 study conducted by the Congressional Research Service (CRS) about climate related disclosures suggests that the lack of penalties for non-disclosure influenced corporations' decisions about whether or not they disclosed climate related information.[17] A robust enforcement regime will be just as important as the mandatory disclosure framework in bringing much needed transparency, accuracy, and comparability to climate related disclosures. We believe that the announcement of a Climate and ESG Task Force within the Division of Enforcement is an important first step in monitoring the likelihood of non-disclosure and potentially false and misleading statements by registrants. We further note that, in the absence of a regulatory mandated taxonomy of terms and phrases, registrants risk engaging in greenwashing or using broad discretion to make certain climate related assertions that may exaggerate the climate related benefits of particular products or strategies. Clearly mandated standards and a robust enforcement regime will enhance the integrity of registrant's disclosures and enhance investor confidence in the transparency and integrity of the markets.

Question 2

What information related to climate risks can be quantified and measured? How are markets currently using quantified information? Are there specific metrics on which all registrants should report (such as, for example, scopes 1, 2, and 3 greenhouse gas emissions, and greenhouse gas reduction goals)? What quantified and measured information or metrics should be disclosed because it may be material to an investment or voting decision? Should disclosures be tiered or scaled based on the size and/or type of registrant)? If so, how? Should disclosures be phased in over time? If so, how? How are markets evaluating and pricing externalities of contributions to climate change? Do climate change related impacts affect the cost of capital, and if so, how and in what ways? How have registrants or investors analyzed risks and costs associated with climate change? What are registrants doing internally to evaluate or project climate scenarios, and what information from or about such internal evaluations should be disclosed to investors to inform investment and voting decisions? How does the absence or presence of robust carbon markets impact firms' analysis of the risks and costs associated with climate change?

We recommend that all registrants disclose their scope 1, 2, and 3 emissions. Publicly traded companies of all sizes and from all sectors should be required to disclose their full scope of operational, supply chain, and product-related emissions. Disclosures of such emissions is the most basic starting point for assessing climate and carbon related risk, however large or small, and progress in addressing it at the scope and rate necessary to help ensure global climate goals are met. This data is critical not only to investors, but to registrants charged with assessing and disclosing their full range of greenhouse gas emissions. Banks and other financial system participants need such data to assess and reduce climate-related risk and/or reduce their own contributions to climate change. Regulators and policy makers must have reliable data on which to make policy decisions. All companies and industries collectively contribute to the climate problem and so must collectively provide this most basic set of information from which all sound decision making must flow.

[17] See Congressional Research Service, 2013 available at https://crsreports.congress.gov/product/pdf/R/R42544.

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Disclosures provided under the current principles-based approach set forth in current SEC guidance are often confusing to shareholders and registrants alike. While leaving disclosures to the discretion of management provides a certain amount of flexibility for registrants, the current regime produces a wide variety of disclosures that vary greatly in their substance, form, and usability. Part of this variety is attributed to the fact that there are, by some estimates, over 400 voluntary disclosure regimes globally. Adding to the confusion, over the course of the last decade, data sources and analysis frameworks have proliferated, while a number of entities provide data and data modeling. Despite, or perhaps because of this plethora of information, the goals of quality and comparability of information on which shareholders can reasonably rely to make sound investment decisions have been elusive. Given the proliferation of data sources, metrics, and frameworks around climate, clarifying expectations for registrant reporting on climate is critical.

We strongly support a mandated disclosure framework that is aligned with the CA100+ Net Zero Benchmark.[18] In an act of private ordering necessary due to the absence of effective regulatory measures and disclosure standards, investors in record numbers have come together to clarify to issuers the basic expectations for climate-related disclosures and actions to reduce systemic climate-related risk. This Benchmark sets forth basic metrics to be used by investors to assess risk and the adequacy of climate-responsive actions. The indicators and sub-indicators that form the basis for the framework include recommendations for analytical methodologies and data-sets to evaluate a company's performance. The Benchmark provides Disclosure Assessment Indicators that are intended to create targets and assess companies' progress towards those targets against ten indicators including:[19]

(1) Net-zero GHG Emissions reduction by 2050 (or sooner) ambition;
(2) Long-term (2036-2050) GHG reduction target(s);
(3) Medium-term (2026-2035) GHG reduction target(s);
(4) Short-term (up to 2025) GHG reduction target(s);
(5) Decarbonization strategy;
(6) Capital allocation alignment;
(7) Climate policy engagement*;
(8) Climate Governance, including linking executive compensation with GHG targets;
(9) Just Transition (*not assessed for 2021*); and
(10) TCFD disclosure (Governance, Strategy, Risk Management, and Metrics and Targets).

Investors have committed years of study to develop the Benchmark's elements of decision-useful, climate related disclosures and actions. We believe that these standards and framework provide the information needed by investors for useful voting and investment decision making. Where time is of the essence for the Commission in adopting a comprehensive mandatory disclosure regime, we believe that the terminology, standards, and framework described herein are an important place for the Commission to

[18] See Climate Action 100+ Net Zero Company Benchmark available at https://www.climateaction100.org/wp-content/uploads/2021/03/Climate-Action-100-Benchmark-Indicators-FINAL-3.12.pdf .

[19] See Climate Action 100+ Methodology available at https://www.climateaction100.org/progress/net-zero-company-benchmark/methodology/.

start in developing mandatory disclosure requirements and cutting short years' worth of study. (The Climate Action 100+ Net Zero Company Benchmark, including disclosure indicators and assessment methodology is available here and the framework for assessment available here.)

Measuring GHG Emissions by Source. We believe it is essential for ***all registrants*** to measure and disclose the company's scope 1, and 2, emissions and to disclose scope 3 emissions where relevant, including supply chain and product-related emissions. The globally accepted taxonomy of designating sources of emissions is as follows:

- Scope One – All direct GHG emissions from sources that an entity owns or directly controls, such as fuel combustion;
- Scope Two – Indirect GHG emissions related to electricity that is purchased and consumed by an entity; and
- Scope Three – Indirect GHG emissions the entity does not directly control or own, which may include emissions associated with supply chain, business travel, water usage, employee commuting, and waste.

Over the last decade, a growing number of registrants, particularly from carbon intensive sectors, disclose sources of emissions using some combination of the three designations. Emissions data is critical to a reasoned analysis of climate risk and response. If the basic information of climate emissions is flawed, or non-existent and therefore has to be estimated, errors are magnified systemically. To foster greater accuracy and consistency in disclosure of emissions, and therefore better analysis and decision making about that information, we recommend that **all industries and companies should be required to disclose scope 1, 2, and 3 emissions** and that an outside body should be referenced for appropriate standards of reporting.

With the recent announcement that the Biden Administration will adopt aggressive goals for reducing greenhouse gas emissions (50-52% of 2005 levels by 2030), registrants are now confronted with a foreseeable regulatory regime that favors low carbon energy sources, products, buildings, etc. The explicit and short term timeline of the goal underscores the need for immediate Commission action. Rapid regulatory action in the U.S sends a signal to the capital markets globally. A strong signal facilitates information dissemination and capital formation to achieve greenhouse gas reduction goals, while providing a price signal to industry of the impact that current regulatory goals will likely have on a business as usual approach to operations.

Short, Mid-Term and Long Range Targets. A registrant's assessments of business practices over the short term, medium term, and long term reflect appropriate time horizons to assess the adequacy of management response to climate change. A company's operational and capital allocation plans should reflect progress across each of these time frames. We note that companies that fail to make short term changes are building risk into the system and are likely to lose flexibility to respond to changing regulatory and technological changes.

Mandating TCFD Recommendations for Implementation. The TCFD disclosure framework has emerged as one of the most widely accepted climate disclosure frameworks and is increasingly being integrated into a number of global regulatory regimes. Since the TCFD recommendations were released by G20's

Financial Stability Board (FSB) in 2017, the TCFD has raised awareness among corporations and regulators about climate related financial risks and has been endorsed by central banks, incorporated as a part of governmental regulatory regimes, and recommended by investors and investor coalitions.[20]

As noted above, global regulators are adopting comprehensive sustainability reporting and due diligence requirements that will impact the disclosure obligations of U.S. registrants conducting business within the EU.[21] The EU regulation on sustainability-related disclosures in the financial services sector (the SFDR) was adopted by the European Parliament and European Council in November 2019 and came into force in March 2021.[22] Additionally, in March 2021, the EU released a proposal to create a legal framework for mandatory human rights and environmental and governance due diligence that is linked to the UN Guiding Principles on Business and Human Rights.[23] Additional measures include the EU Taxonomy Climate Delegated Act that identifies the economic activities that contribute to climate change mitigation and adaptation and Six Delegated Acts on fiduciary duties, investment and insurance advice that aim to ensure that financial firms include sustainability in their procedures and investment advice to clients.[24] The EU taxonomy regulation provides a classification system and serves as a reference point to establish commonly defined activities that are sustainable, contribute to environmental objectives, and do no harm to objectives.[25] Additionally, firms that are subject to the Non-Financial Reporting Directive (NFRD) will be required to disclose in their financial statements information on the proportion of their activities that are classified as environmentally sustainable according to the Taxonomy Regulation and will likely be subject to the amended Corporate Sustainability Reporting Directive (CSRD).[26] We strongly recommend that the Commission align its rulemaking efforts to align with the taxonomy established under the EU Taxonomy to avoid confusion among stakeholders and to ensure comparability in disclosures.

Question 3

What are the advantages and disadvantages of permitting investors, registrants, and other industry participants to develop disclosure standards mutually agreed by them? Should those standards satisfy minimum disclosure requirements established by the Commission? How should such a system work? What minimum disclosure requirements should the Commission establish if it were

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[20] See KPMG, "The Time Has Come: The KPMG Survey of Sustainability Reporting 2020," December 2020 available at https://assets.kpmg/content/dam/kpmg/be/pdf/2020/12/The_Time_Has_Come_KPMG_Survey_of_Sustainability_Reporting_2020.pdf.

[21] See Karen E. Torrent, "What the E.U. Draft Directive Means for U.S. Companies' Climate-Related Financial Risk Disclosure," FinReg Blog, Global Financial Markets Center at Duke University School of Law, November 11, 2020 available at https://sites.law.duke.edu/thefinregblog/2020/11/11/what-the-e-u-draft-directive-means-for-u-s-companies-climate-related-financial-risk-disclosures/.

[22] See Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial sector. (the six specified environmental objectives include climate mitigation, climate adaptation, sustainable use and protection of water and marine resources; transition to a circular economy' pollution prevention and control; and protection and restoration of biodiversity and ecosystems.

[23] See Hughes-Jennett and Polaschek,"The EU's Increasing ESG Regulation and Its Implications for Business, Quinn Emmanuel Urquhart & Sulllivan, LLP, JD Supra, April 7, 2021 available at https://www.jdsupra.com/legalnews/the-eu-s-increasing-esg-regulation-and-7966413/.

[24] See Commission Delegated Regulation (EU) 2020/852 available at https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800_en.pdf.

[25] Id.

[26] See Non-Financial Reporting Directive 2014 (2014/95/EU) available at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0095&from=EN.

to allow industry-led disclosure standards? What level of granularity should be used to define industries (e.g., two-digit SIC, four-digit SIC, etc.)?

While we strongly support stakeholder engagement in the development of disclosure standards, we note that the stakeholder process on appropriate standards is already well underway through the CA100+ and we do not recommend that the Commission start a wholly new initiative from square one. This would be a significant backward step at a time when the world needs quick and decisive action from the Commission to reduce systemic climate risk and help forestall catastrophic climate impacts. We recommend that the Commission build on globally accepted standards and frameworks, leaving room to improve those standards moving forward.

Toward this end, we strongly support Commission efforts to coordinate with regulatory peers to balance the unique requirements of U.S. securities laws with fostering best practices to achieve comparability among global stakeholders. U.S. registrants are and will continue to be subject to a variety of mandatory regulatory regimes that address due diligence and mandatory disclosure requirements for climate change, environmental, social and governance factors. A federal securities law framework that is aligned with well-established global standards decreases the likelihood that registrants will unwittingly disclose information in varied and possibly contradictory ways across communications platforms that include periodic filings, online platforms, and sustainability reports.

Question 4
What are the advantages and disadvantages of establishing different climate change reporting standards for different industries, such as the financial sector, oil and gas, transportation, etc.? How should any such industry-focused standards be developed and implemented?

While climate-related risks will differ based on industry, certain minimal disclosure and action requirements, such as those set forth in the Benchmark, should be required for every industry. These minimum standards will not only require that all companies disclose their climate emissions, address climate risk, and set targets in line with global science-based emission reduction goals, but that they report progress on their climate transition plans in a comparable manner.
That said, industries differ in the extent of climate risk they face and create. Measurement and disclosure schemes will also certainly differ based on industry related activities and operations, the extent of typical upstream and downstream emissions, reliance on supply chain emissions data, and the extent of product-related emissions, to name just a few. We believe that, starting with the most carbon intensive industries, such as oil and gas, industry-specific, climate reporting standards should be recognized and/or developed. We note that certain industries, such as the banking sector, have made significant strides in developing climate-related emissions measurement and reporting standards (PCAF) that have wide buy-in from industry and outside stakeholders. Adopting such well accepted standards as a floor for reporting can promote comparability in reporting across industries.

Another example is the Sustainability Accounting Standards Board (SASB) which develops industry reporting standards based on active engagement and feedback from stakeholders, with the goal of encouraging uniform disclosure.[27] We support continued efforts to work with standard setters, including PCAF and SASB, to increase industry-oriented, climate-related registrant disclosures.

Question 5

What are the advantages and disadvantages of rules that incorporate or draw on existing frameworks, such as, for example, those developed by the Task Force on Climate-Related Financial Disclosures (TCFD), the Sustainability Accounting Standards Board (SASB), and the Climate Disclosure Standards Board (CDSB)?[7] Are there any specific frameworks that the Commission should consider? If so, which frameworks and why?

As noted above, rules that incorporate existing standards are critical to enhancing the uniformity of disclosure globally. While, to date, the Commission has adhered to a principles-based approach to disclosure over adopting a more prescriptive climate change disclosure regime, EU member countries, the UK, New Zealand, Japan and Singapore, and their exchanges have either adopted or are actively engaged in finalizing regulations to adopt mandatory disclosure of the TCFD framework for climate change disclosure in part or in its entirety. We strongly support the Commission's efforts to coordinate with global peers. We also support using existing frameworks such as the Benchmark, TCFD, Greenhouse Gas Protocol, Science-Based Targets Initiative, and others. Using existing frameworks to shorten the period necessary for reporting standards development and aligning the scope and taxonomy of regulations to create more robust disclosure efforts will be critical in achieving greater comparability of disclosures in line with the global, science-based timeframe for global climate action. Currently, we must make dramatic global reductions in GHG emissions in the next seven years or put ourselves in harm's way for catastrophic climate impacts.

Question 7

What is the best approach for requiring climate-related disclosures? For example, should any such disclosures be incorporated into existing rules such as Regulation S-K or Regulation S-X, or should a new regulation devoted entirely to climate risks, opportunities, and impacts be promulgated? Should any such disclosures be filed with or furnished to the Commission?

Under the SEC's current framework for qualitative disclosure under Regulation S-K, specifically under Items 101, 103 and 105 and under the Management Discussion & Analysis (MD&A), some but not all registrants do utilize these sections in periodic filings to include climate related disclosures. <u>We strongly support a mandatory disclosure regime that explicitly directs registrants as to where and how climate related disclosures should be included in periodic filings.</u>

In the same manner that the SEC modernized the Mineral Property Disclosure Rules (Mineral Rule), in which the Commission established a new subpart in Regulation S-K, we seek a similar subpart that would provide investors with a more comprehensive understanding of climate related disclosures in a targeted

[27] We note however that SASB has only identified certain industries as having material climate risks relevant for SASB disclosure, while also stating that this should not preclude disclosures of Scope 1, 2, and 3 emissions for all industries. https://www.sasb.org/wp-content/uploads/2020/10/GHG-Emmissions-100520.pdf

section, allowing investors the ability to locate the same information in the same place across registrants. We recommend that the Commission provide explicit direction about the format to ensure that disclosures create ready comparability.

Question 8

How, if at all, should registrants disclose their internal governance and oversight of climate-related issues? For example, what are the advantages and disadvantages of requiring disclosure concerning the connection between executive or employee compensation and climate change risks and impacts?

We strongly support the disclosure of whether and how executive compensation is directly tied to meeting climate related targets as a measure of a board's governance and oversight practices. The Climate Action 100+ Net Zero Company Benchmark ("Net Zero Benchmark") provides a framework for investors to assess companies based on their publicly disclosed information. As discussed throughout, the Net Zero Benchmark is the outcome of a robust investor assessment of climate related data. The Benchmark provides explicit indicators that instruct registrants about what to disclose and how to disclose decision-useful climate related information. Sub-indicator 8.2 of the Net Zero Benchmark addresses the disclosure of a company's executive remuneration as a part of an assessment of board oversight and climate governance. We believe that compensation tied to greenhouse gas emissions goals is essential to ensuring that management has sufficient incentive to meet such goals and to provide investors with an indication of the strength of the board's governance and oversight of climate related risks and opportunities.

We also support an alignment of climate-related executive compensation disclosure provisions with any clawback provisions concerning executive compensation under Sarbanes-Oxley. Since 2002, a registrant's CEO and CFO have been subject to mandatory clawback requirements under Sarbanes Oxley when there is a restatement of financial results that occurred as a result of misconduct.[28] Under SEC rules, companies are now required to disclose any practices or policies regarding the ability of employees (including officers) or directors to engage in transactions that hedge or offset any decrease in the market value of the company's equity securities or those of certain related entities, as mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).[29] Registrants must provide

[28] See Release No. 33-9861 (August 2015) File No. s7-12-15; Release Nos. 33-9861, 34-75342], Listing standards for Recovery of Erroneously Awarded Compensation available at https://www.sec.gov/rules/proposed/2015/33-9861.pdf ; ("Clawback Rules): Section 954 of Dodd-Frank added a new Section 10D to the Securities Exchange Act of 1934 (the "Exchange Act") to require clabacks of executive incentive compensation in circumstances established by the SEC.As proposed 10D-1 would require national securities exchanges and associations to establish listing standards that would require all listed companies to adopt and comply with compensation recovery (or clawback) policies. Recovery would be required from current and former executive officers who received incentive based compensation during the three fiscal years preceding the date on which the company is required to prepare an accounting restatement to correct a material error. The recovery would be required on a "no-fault" basis, without regard to whether any misconduct occurred or to an executive officer's responsibility for the erroneous financial statements.

[29] When the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") became federal law to provide safeguards for consumers and increase transparency in the U.S. capital markets it addressed the public outcry over a lack of oversight that came to light during the financial crisis. We strongly support the inclusion of climate related disclosures as consistent with the mandate particularly where global regulators acknowledge the need for greater transparency in climate related disclosures as essential to regulators in identifying sources of disruption to financial stability. *See* Legal Update, Dodd-Frank and

the disclosures in proxy or information statements that relate to the election of directors.[30] Although executive compensation rules proposed under the Dodd-Frank Act (e.g., pay for performance, clawback of excess incentive-based compensation after a restatement) have been on the SEC's rulemaking agenda since 2015, many companies adopted clawback provisions in anticipation of the rule.[31]

Should the Commission revisit the proposed Rule 10D-1, we support efforts to ensure that the same standards for monitoring and enforcing incentive-based compensation are applied consistently to climate-related compensation standards. Clawback rules are an integral risk mitigation tool that allows companies to recoup undeserved incentive payments. Clawback provisions in instances of greenwashing or overstating the environmental or climate related performance of the company and to address material disparities in sustainability reports and periodic SEC filings and financial statements, would provide the Commission with a tool to ensure the reliability and integrity of executive statements and incentive-based compensation.

Question 9

What are the advantages and disadvantages of developing a single set of global standards applicable to companies around the world, including registrants under the Commission's rules, versus multiple standard setters and standards? If there were to be a single standard setter and set of standards, which one should it be? What are the advantages and disadvantages of establishing a minimum global set of standards as a baseline that individual jurisdictions could build on versus a comprehensive set of standards? If there are multiple standard setters, how can standards be aligned to enhance comparability and reliability? What should be the interaction between any global standard and Commission requirements? If the Commission were to endorse or incorporate a global standard, what are the advantages and disadvantages of having mandatory compliance?

From an enforcement perspective, standards will be critical in ensuring that registrants take care to produce disclosures, both in periodic filings and in any CSR or Sustainability reports that are consistent, aligned and comparable across platforms. For example, where registrants may make assertions in their Sustainability reports that differ from assertions made in periodic filings, there may be an appearance of or actual material omissions or misstatements that have the effect of misleading investors. These kinds of discrepancies undermine the integrity of the markets. By adopting a mandatory climate disclosure framework, the Commission will have a standard with is auditable and enforceable while ensuring transparency and accountability in corporate disclosure practices.

Question 10

Executive Compensations Where are we Now? August 28, 2015, available at https://www.seyfarth.com/news-insights/dodd-frank-and-executive-compensation-where-are-we-now.html

[30] Registrants that do not have such policies or practices must disclose that fact or state that hedging transactions are generally permitted. Registrants other than SRCs and EGCs were required to provide the disclosures during fiscal years beginning on or after 1 July 2019. SRCs and EGCs must provide the disclosures during fiscal years beginning on or after 1 July 2020. Listed closed-end funds and foreign private issuers (FPIs) are not subject to the rules.

[31] See "SEC Financial Reporting Series, 2021 Proxy Statements: An Overview of the Requirements and Observations about current practice," available at https://assets.ey.com.

How should disclosures under any such standards be enforced or assessed? For example, what are the advantages and disadvantages of making disclosures subject to audit or another form of assurance? If there is an audit or assurance process or requirement, what organization(s) should perform such tasks? What relationship should the Commission or other existing bodies have to such tasks? What assurance framework should the Commission consider requiring or permitting?

We strongly support Commission coordination with the Public Company Accounting Oversight Board (PCAOB), to facilitate a clear statement of responsibility for auditors charged with assessing the veracity and appropriateness and consistency of disclosures. Auditors function as gatekeepers whose opinions will be critical to assessing and ensuring the integrity of disclosures. We support continued coordination of efforts currently underway to ensure that disclosures that are material to financial statements are aligned with auditing procedures and disclosures.

It is critical that a mandatory climate disclosure regime provides for assessment, monitoring and alignment with financial data and audit reporting standards and procedures. We recommend explicit instruction to auditors concerning the standards for testing and evaluating climate related disclosures to ensure that where material climate related financial events are triggered that appropriate disclosure processes and statements occur.[32]

Such a regulatory regime will directly and indirectly influence the asset valuations and asset retirement obligations, capital expenditures, and cash flows, among other financial considerations, of nearly every sector of the economy.

Question 11

Should the Commission consider other measures to ensure the reliability of climate-related disclosures? Should the Commission, for example, consider whether management's annual report on internal control over financial reporting and related requirements should be updated to ensure sufficient analysis of controls around climate reporting? Should the Commission consider requiring a certification by the CEO, CFO, or other corporate officer relating to climate disclosures?

We recommend that the Commission ensure that the financial impacts of climate related data is disclosed according to the U.S. generally accepted accounting principles and International Financial Reporting Standards. We support continued coordination with U.S. and global regulatory bodies to harmonize provisions that provide clear, prescriptive measures to registrants and provide comparability for investors. As discussed in our response to question 8, we strongly support periodic review to evaluate the assertions of management with incentive based compensation and an enforcement framework that serves as a deterrent for false or misleading statements concerning the impact of climate related assessments on a company's financial data and aligns with financial reporting practices and auditor responsibilities.

Question 12

[32] See Samantha Ross, "The Role of Accounting and Auditing in Addressing Climate Change, Center for American Progress, March 1, 2021 available at https://www.americanprogress.org/issues/economy/reports/2021/03/01/496290/role-accounting-auditing-addressing-climate-change/.

What are the advantages and disadvantages of a "comply or explain" framework for climate change that would permit registrants to either comply with, or if they do not comply, explain why they have not complied with the disclosure rules? How should this work? Should "comply or explain" apply to all climate change disclosures or just select ones, and why?

We do not support a 'comply or explain' approach with regard to mandatory climate disclosures. As discussed throughout, we support a mandatory framework for all registrants. Although we recognize that some registrants may be reluctant to engage in the assessments necessary to support climate related disclosures, we are concerned that a 'comply or explain' approach will undermine the immediate action needed to spur action and provide investors with necessary data, ensure regulators have the tools to identify risks, and ensure transparency and integrity in the markets. However the 'comply or explain' approach may be effective when a registrant's plans or operations fall short of stated targets. For example, the CA100+ Benchmark asks companies to set short, medium, and long term net zero-aligned greenhouse gas reduction plans and disclose climate transition plans for achieving such targets. The company may miss a target, or the plans in place for achieving those targets may change due to a range of issues from customer preferences, to capital requirements, to new technologies. Where companies do not meet the terms of disclosed targets or plans, a 'comply or explain' approach reduces company reluctance to set initial targets and disclose plans, and increases willingness to adopt better plans over time.

As demonstrated by strong shareholder votes this year, a range of target setting initiatives supported by significant numbers of investors, and a host of other ways shareholders have underscored the importance of registrants setting Paris-aligned net zero goals, it is critically important for all companies to set such targets.

Question 15

In addition to climate-related disclosure, the staff is evaluating a range of disclosure issues under the heading of environmental, social, and governance, or ESG, matters. Should climate-related requirements be one component of a broader ESG disclosure framework? How should the Commission craft climate-related disclosure requirements that would complement a broader ESG disclosure standard? How do climate-related disclosure issues relate to the broader spectrum of ESG disclosure issues?

We strongly recommend that the Commission make a climate change disclosure framework its first priority.

As stated above, we support and encourage the Commission's continued work to coordinate efforts across agencies and alongside global regulators. We also encourage coordination within the Commission. We are increasingly concerned that the misleading or confusing statements that investors encounter in reviewing periodic disclosures under the Securities and Exchange Act, extends to investor selection of funds regulated under the Investment Company or '40 Act. Without clear terminology harmonized across platforms, investors encounter a wide variety of frameworks, where the same term can have a variety of meanings registrants use at their discretion. When these terms appear on websites, sustainability reports, third party platforms, social media, etc., registrant statements about climate or sustainability can become confusing to the point of being misleading.

The tendency toward 'greenwashing' or making assertions and claims that overstate the environmental or climate integrity of operational processes and products is as problematic under periodic disclosures as it is in the naming conventions of investment funds. For example, the naming of mutual funds and ETFs is both confusing and misleading. Of the 3,000 most held funds and ETFs in U.S. 401(k) plans 88 have the term "ESG in their name (there are many others with the term "ESG" in the prospectus.) Of these 51 (57.9%) include holdings in equities that score a "D" or an "F" on one of As You Sow's Invest Your Values scorecards[33] for fossil fuels, deforestations, private prisons, weapons, tobacco and gender inequality. (See table in Annex 1 for details).

In addition, of these 3,000 most held funds, 274 are designated as "sustainable" by Morningstar, based on their prospectus. Of these 174 (58.8%) include holdings in equities that score a "D" or an "F" on one of As You Sow's Invest Your Values scorecards[34] for fossil fuels, deforestations, private prisons, weapons, tobacco and gender inequality. (See table in Annex 2 for details)

We support the Commission's efforts to develop a framework for addressing the names of registered investment companies under the Investment Company Act[35] and encourage harmonized terminology as the Commission exercises its authority under the '33 and '34 Acts. We believe that harmonizing standards, frameworks, and terminology will ensure that investors have a steady flow of timely, comprehensive and accurate information.

It is our sincerest hope that the Commission will continue to work with and participate in collaborative discussions with both U.S. agencies and global partners to effectively adopt and implement climate risk management principles to mitigate systemic risk exposure and develop a process for periodic checks and assurances to maintain global financial stability.

Sincerely,

Andrew Behar
CEO, As You Sow

Attachments:

ANNEX 1
Table: "ESG" Named Funds and ETFs receiving D or F grades

ANNEX 2
Table: "Sustainable" Funds and ETFs receiving D or F grades

[33] As You Sow website, Invest Your Values Scorecards: https://www.asyousow.org/invest-your-values
[34] As You Sow website, Invest Your Values Scorecards: https://www.asyousow.org/invest-your-values
[35] See Securities and Exchange Commission Concept Release Nos. IC-33809; File No. 07-0420, RIN 3235-AM72, Request for Comments on Fund Names, available at https://www.sec.gov/rules/other/2020/ic-33809.pdf.

AS YOU SOW

MUTUAL FUNDS AND ETFS WITH ESG IN THEIR NAME: 51/88 GRADED D OR F

Fund family	Fund name	Inception date	US-SIF	Fossil fuel grade	Deforestation grade	Gender equality grade	Civilian firearms grade	Prison industrial complex grade	Military weapons grade	Tobacco grade		
AIG	AIG ESG Dividend Fund	2016-12-16		C	B	A	A	B	A	A		1
Ashmore	Ashmore Emerging Markets Equity ESG Fund	2020-02-26		A	B	F	A	A	A	A	1	1
BlackRock/iShares	BlackRock Advantage ESG U.S. EquityFund	2016-03-28		C	B	A	A	C	B	B		1
	iShares ESG Advanced MSCI EAFE Index ETF	2020-06-16		B	C	C	A	F	B	B	1	1
	iShares ESG Advanced MSCI EM ETF	2020-10-06		A	D	N/A	A	A	A	A	1	1
	iShares ESG Aware MSCI EAFE ETF	2016-06-28		D	F	A	A	C	C	B	1	1
	iShares ESG Aware MSCI EM ETF	2016-06-28		C	D	N/A	A	A	A	A	1	1
	iShares ESG Aware MSCI USA ETF	2016-12-01		D	D	A	A	C	D	B	1	1
	iShares ESG Aware MSCI USA Small-Cap ETF	2018-04-10		C	B	D	A	C	C	B	1	1
	iShares ESG MSCI EM Leaders ETF	2020-02-05		D	D	N/A	A	A	A	A	1	1
	iShares ESG MSCI USA Leaders ETF	2019-05-07		B	C	A	A	C	B	B		1
	iShares MSCI USA ESG Select ETF	2005-01-24		D	C	A	A	C	B	B	1	1
	iShares® ESG Advanced MSCI USA ETF	2020-06-16		A	C	B	A	C	B	A		1
	iShares® ESG Screened S&P 500 ETF	2020-09-22		C	C	A	A	C	B	B		1
	iShares® ESG Screened S&P Mid-Cap ETF	2020-09-22		B	B	D	A	C	C	A	1	1
	iShares® ESG Screened S&P Small-Cap ETF	2020-09-22		B	B	F	C	F	B	A	1	1
Boston Common	Boston Common ESG Impact International Fund	2010-12-29	Yes	A	Engagement	B	A	A	A	A		1
	Boston Common ESG Impact U.S. Equity Fund	2012-04-30	Yes	A	Engagement	A	A	B	A	Engagement		1
Coho	Coho Relative Value ESG Fund	2019-11-27		A	B	A	A	B	A	A		1
DWS	DWS ESG Core Equity Fund	2005-08-01		B	C	A	A	B	C	B		1
	DWS ESG International Core Equity Fund	2014-11-11		D	F	A	A	B	B	F	1	1
Dana Investment	Dana Epiphany ESG Equity Fund	2008-02-13		C	B	B	A	B	A	B		1
	Dana Epiphany ESG Small Cap Equity Fund	2015-11-03		C	B	F	A	A	C	A	1	1
Direxion Funds	Direxion MSCI USA ESG - Leaders vs. Laggards ETF	2020-02-05		D	B	A	A	C	D	A	1	1
Fisher Investments	Fisher Investments Institutional Group ESG Stock Fund for Retirement Plans	2019-12-13		D	B	B	A	B	A	A	1	1
Flexshares Trust	FlexShares STOXX Global ESG Impact Index Fund	2016-07-13		D	D	A	A	F	C	C	1	1
	FlexShares STOXX US ESG Impact Index Fund	2016-07-13		D	C	A	A	C	C	D	1	1
Franklin Templeton Investments	ClearBridge Dividend Strategy ESG ETF	2017-05-22		D	D	A	A	B	D	B	1	1
	ClearBridge Large Cap Growth ESG ETF	2017-05-22		A	B	A	A	B	D	B	1	1
Gabelli	Gabelli ESG Fund	2007-06-01	Yes	C	B	A	A	B	B	B		1
Glenmede	Glenmede Responsible ESG U.S. Equity Portfolio	2015-12-22		C	F	C	B	B	D	B	1	1
Goldman Sachs	Goldman Sachs ESG Emerging Markets Equity Fund	2018-05-31		B	B	N/A	A	A	A	A		1
	Goldman Sachs International Equity ESG Fund	1992-12-01		B	D	A	A	B	A	A	1	1
Gotham	Gotham ESG Large Value Fund	2018-12-28		C	D	B	A	D	F	B	1	1
Horizon Investments	Horizon ESG Defensive Core Fund	2019-12-27		B	C	A	A	B	C	B		1
IndexIQ	IQ Candriam ESG International Equity ETF	2019-12-16		F	F	A	A	F	B	B	1	1
	IQ Candriam ESG US Equity ETF	2019-12-16		B	C	B	A	C	B	B		1
Inspire	Inspire Faithward Large Cap Momentum ESG ETF	2020-12-07		B	B	D	A	B	A	A	1	1
	Inspire Faithward Mid Cap Momentum ESG ETF	2020-12-07		A	A	F	A	A	A	A	1	1
	Inspire Tactical Large Cap ESG ETF	2020-07-15		D	C	F	A	B	F	A	1	1
IntegrityVikingFunds	Integrity ESG Growth & Income Fund	1995-01-03		B	B	A	A	B	A	B		1
Invesco	Invesco Real Assets ESG ETF	2020-12-18		F	F	C	A	A	A	A	1	1
	Invesco US Large Cap Core ESG ETF	2020-12-18		C	B	A	A	D	A	B	1	1
John Hancock	John Hancock ESG All Cap Core Fund	2016-06-06		A	B	B	A	B	A	A		1

	John Hancock ESG International Equity Fund	2016-12-14		A	B	C	A	A	A	A		1
	John Hancock ESG Large Cap Core Fund	2016-06-06		A	B	A	A	B	A	A		1
Kennedy Capital Management	Kennedy Capital ESG SMID Cap Fund	2019-06-28	Yes	B	D	D	A	B	C	A	1	1
KraneShares	KraneShares MSCI China ESG Leaders Index ETF	2020-07-29		C	B	F	A	A	A	A	1	1
Matthews Asia Funds	Matthews Asia ESG Fund	2015-04-30		A	B	N/A	A	A	A	A		1
New Age Alpha	AVDR US LargeCap ESG ETF	2020-12-29		B	B	A	B	B	B	F	1	1
Northern Funds	Northern U.S. Quality ESG Fund	2020-08-21		B	D	A	A	D	D	B	1	1
Old Westbury	Old Westbury All Cap ESG Fund	2018-03-01		C	D	B	A	F	F	B	1	1
PIMCO	PIMCO RAFI ESG U.S. ETF	2019-12-18		B	D	A	A	B	A	B	1	1
Pax World	PAX ESG BETA DIVIDEND FUND	2016-12-16	Yes	A	Engagement	A	A	B	A	B		1
	Pax ESG Beta Quality Fund	1997-06-11	Yes	B	Engagement	B	A	B	B	B		1
	Pax MSCI EAFE ESG Leaders Index Fund	2014-03-31	Yes	B	Engagement	A	A	B	B	B		1
Pioneer Investments	Pioneer Balanced ESG Fund	2005-09-23		B	B	A	A	D	C	B	1	1
SPDR State Street	SPDR® S&P 500® ESG ETF	2020-07-27		C	C	A	A	C	B	B		1
Sit	Sit ESG Growth Fund	2016-07-01		A	B	A	A	C	F	B	1	1
TIAA Investments/Nuveen	Nuveen ESG Emerging Markets Equity ETF	2017-06-06		C	D	N/A	A	A	A	A	1	1
	Nuveen ESG International Developed Markets Equity ETF	2017-06-06		C	F	A	A	F	B	B	1	1
	Nuveen ESG Large-Cap ETF	2019-06-03		C	C	A	A	B	B	B		1
	Nuveen ESG Large-Cap Growth ETF	2016-12-13		A	B	C	A	B	B	B		1
	Nuveen ESG Large-Cap Value ETF	2016-12-13		D	D	A	A	C	A	B	1	1
	Nuveen ESG Mid-Cap Growth ETF	2016-12-13		A	B	D	A	A	C	A	1	1
	Nuveen ESG Mid-Cap Value ETF	2016-12-13		D	F	C	A	D	A	A	1	1
	Nuveen ESG Small-Cap ETF	2016-12-13		C	B	D	A	C	B	A	1	1
	Nuveen Winslow Large-Cap Growth ESG Fund	2009-05-15		A	B	A	A	B	C	B		1
Tortoise Capital	Ecofin Global Water ESG Fund	2017-02-14		A	A	B	A	A	A	A		1
Touchstone	Touchstone Global ESG Equity Fund	2003-10-06		B	B	B	A	B	A	B		1
	Touchstone International ESG Equity Fund	2007-12-03		C	B	B	A	A	B	B		1
Trillium Mutual Funds	Trillium ESG Global Equity Fund	2007-03-30	Yes	A	Engagement	B	A	B	C	A		1
	Trillium ESG Small/Mid Cap Fund	2015-08-31	Yes	B	Engagement	D	A	A	A	A	1	1
TrueShares	TrueShares ESG Active Opportunities ETF	2020-02-28		B	B	A	A	B	A	B		1
Tuttle	Trend Aggregation ESG ETF	2020-05-07		B	B	C	B	B	B	B		1
Vanguard	Vanguard ESG International Stock ETF	2018-09-18		B	D	C	A	F	B	B	1	1
	Vanguard ESG U.S. Stock ETF	2018-09-18		B	C	B	B	C	B	B		1
	Vanguard Global ESG Select Stock Fund	2019-06-05		B	B	A	A	B	A	A		1
WCM Investment Management	WCM Focused ESG Emerging Markets Fund	2020-03-31		B	F	D	A	B	A	A	1	1
	WCM Focused ESG International Fund	2020-03-31		B	F	C	A	B	A	A	1	1
WisdomTree	WisdomTree Emerging Markets ESG Fund	2016-04-07		B	D	N/A	A	A	A	A	1	1
	WisdomTree International ESG Fund	2016-11-03		B	C	A	A	B	C	B		1
	WisdomTree U.S. ESG Fund	2007-02-23		B	D	B	A	C	B	B	1	1
Xtrackers	Xtrackers MSCI ACWI ex USA ESG Leaders Equity ETF	2018-12-04		D	D	B	A	B	B	B	1	1
	Xtrackers MSCI EAFE ESG Leaders Equity ETF	2018-09-05		D	D	A	A	B	B	B	1	1
	Xtrackers MSCI Emerging Markets ESG Leaders Equity ETF	2018-12-04		D	D	N/A	A	A	A	A	1	1
	Xtrackers MSCI USA ESG Leaders Equity ETF	2019-03-06		B	C	A	A	C	B	B		1
	Xtrackers S&P 500 ESG ETF	2019-06-25		C	C	A	A	C	B	B		1
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MUTUAL FUNDS AND ETFS "SUSTAINABLE" BY MORNINGSTAR: 174/296 GRADED D OR F

Fund family	Fund name	Inception date	US-SIF	Fossil fuel grade	Deforestation grade	Gender equality grade	Civilian firearms grade	Prison industrial complex grade	Military weapons grade	Tobacco grade		
1919 Funds	1919 Socially Responsive Balanced Fund	2008-07-24	Yes	A	B	B	A	B	A	B		1
AGF Investments	AGF Global Sustainable Growth Equity Fund	2017-11-15		A	A	D	A	A	F	A	1	1
AIG	AIG ESG Dividend Fund	2016-12-16		C	B	A	A	B	A	A		1
ALPS	ALPS Clean Energy ETF	2018-06-27		C	A	F	A	A	A	A	1	1
Aberdeen	Aberdeen Emerging Markets Sustainable Leaders Fund	2000-08-30		B	D	N/A	A	A	A	A	1	1
	Aberdeen Global Equity Impact Fund	2005-05-04		B	B	B	A	B	A	A		1
	Aberdeen International Sustainable Leaders Fund	1993-10-04		A	B	B	A	A	A	A		1
	Aberdeen U.S. Sustainable Leaders Fund	2001-03-01		B	B	C	A	F	A	A	1	1
	Aberdeen U.S. Sustainable Leaders Smaller Companies Fund	1997-12-31		A	A	D	A	F	A	A	1	1
Adasina	Adasina Social Justice All Cap Global ETF	2020-12-08		A	B	D	A	A	A	A	1	1
Advisors Preferred	Quantified Common Ground Fund	2019-12-30		B	B	F	A	A	A	A	1	1
Alger	Alger Responsible Investing Fund	2016-10-14		B	B	A	A	B	D	B	1	1
AllianceBernstein	AB Sustainable Global Thematic Fund	1993-05-03		B	B	D	A	B	A	A	1	1
	AB Sustainable International Thematic Fund	2005-03-01		B	F	C	A	A	A	A	1	1
Alpha Architect	Alpha Architect Freedom 100 Emerging Markets ETF	2019-05-22		D	F	N/A	A	A	A	C	1	1
Amana	Amana Mutual Funds Trust Developing World Fund	2013-09-25		B	D	F	A	A	A	A	1	1
	Amana Mutual Funds Trust Growth Fund	1994-02-03		A	B	A	A	A	A	A		1
	Amana Mutual Funds Trust Income Fund	1986-06-23		A	B	A	A	B	F	A	1	1
American Century Investments	American Century Mid Cap Growth Impact ETF	2020-07-15		A	B	D	A	A	F	A	1	1
	American Century Sustainable Equity ETF	2020-07-15		C	B	A	A	C	D	B	1	1
	American Century Sustainable Equity Fund	2017-04-10		C	B	A	A	C	D	B	1	1
Amplify ETFs	Amplify Lithium & Battery Technology ETF	2018-06-04		F	F	C	A	B	C	A	1	1
Appleseed Fund	Appleseed Fund	2006-12-08		A	F	F	A	A	A	B	1	1
Ariel Investments	Ariel Appreciation Fund	2011-12-30		A	B	C	A	B	A	B		1
	Ariel Focus Fund	2011-12-30		B	B	C	A	F	D	B	1	1
	Ariel Fund	2011-12-30		C	B	D	A	A	A	B	1	1
Ashmore	Ashmore Emerging Markets Equity ESG Fund	2020-02-26		A	B	F	A	A	A	A	1	1
Aspiration Funds	Aspiration Redwood Fund	2015-11-16	Yes	A	B	C	A	B	A	A		1
BNY Mellon	BNY Mellon Sustainable Balanced Fund	2017-11-30		B	B	A	A	B	A	B		1
	BNY Mellon Sustainable U.S. Equity Fund	2016-09-30		C	B	A	A	B	A	A		1
Baillie Gifford Funds	Baillie Gifford Global Stewardship Equities Fund	2017-12-14		A	B	F	A	B	A	A	1	1
	Baillie Gifford Positive Change Equities Fund	2017-12-14		A	B	F	A	A	A	A	1	1
Baywood	Baywood Socially Responsible Fund	2005-01-03	Yes	D	B	B	A	B	A	B	1	1
Beyond Advisors IC	US Vegan Climate ETF	2019-09-09		A	A	B	A	C	A	B		1
BlackRock/iShares	BlackRock Advantage ESG U.S. EquityFund	2016-03-28		C	B	A	A	C	B	B		1
	BlackRock Global Impact Fund	2020-05-27		A	B	F	A	A	A	A	1	1
	BlackRock International Impact Fund	2020-06-30		A	B	D	A	A	A	A	1	1
	BlackRock U.S. Impact Fund	2020-06-30		A	A	D	A	A	A	A	1	1
	iShares ESG Advanced MSCI EAFE Index ETF	2020-06-16		B	C	C	A	F	B	B	1	1
	iShares ESG Advanced MSCI EM ETF	2020-10-06		A	D	N/A	A	A	A	A	1	1
	iShares ESG Aware MSCI EAFE ETF	2016-06-28		D	F	A	A	C	C	B	1	1
	iShares ESG Aware MSCI EM ETF	2016-06-28		C	D	N/A	A	A	A	A	1	1
	iShares ESG Aware MSCI USA ETF	2016-12-01		D	D	A	A	C	D	B	1	1
	iShares ESG Aware MSCI USA Small-Cap ETF	2018-04-10		C	B	D	A	C	C	B	1	1
	iShares ESG MSCI EM Leaders ETF	2020-02-05		D	D	N/A	A	A	A	A	1	1
	iShares ESG MSCI USA Leaders ETF	2019-05-07		B	C	A	A	C	B	B		1

	iShares Global Clean Energy ETF	2008-06-24		C	A	A	A	A	A	A		1
	iShares MSCI ACWI Low Carbon Target ETF	2014-12-08		C	C	C	B	F	C	D	1	1
	iShares MSCI Global Impact ETF	2016-04-20		B	F	C	A	A	A	A	1	1
	iShares MSCI KLD 400 Social ETF	2006-11-14		C	C	A	A	C	B	B		1
	iShares MSCI USA ESG Select ETF	2005-01-24		D	C	A	A	C	B	B	1	1
	iShares® ESG Advanced MSCI USA ETF	2020-06-16		A	C	B	A	C	B	A		1
	iShares® ESG Screened S&P 500 ETF	2020-09-22		C	C	A	A	C	B	B		1
	iShares® ESG Screened S&P Mid-Cap ETF	2020-09-22		B	B	D	A	C	C	A	1	1
	iShares® ESG Screened S&P Small-Cap ETF	2020-09-22		B	B	F	C	F	B	A	1	1
Boston Common	Boston Common ESG Impact International Fund	2010-12-29	Yes	A	Engagement	B	A	A	A	A		1
	Boston Common ESG Impact U.S. Equity Fund	2012-04-30	Yes	A	Engagement	A	A	B	A	Engagement		1
Boston Trust Walden Funds	Boston Trust Asset Management Fund	1995-12-01		C	B	A	A	B	B	B		1
	Boston Trust Equity Fund	2003-10-01		C	B	A	A	B	C	B		1
	Boston Trust Midcap Fund	2007-09-24		D	B	D	A	A	C	A	1	1
	Boston Trust SMID Cap Fund	2011-11-30		D	B	D	A	A	A	A	1	1
	Boston Trust Walden Balanced Fund	1999-06-18	Yes	B	Engagement	B	A	B	A	Engagement		1
	Boston Trust Walden Equity Fund	1999-06-18	Yes	C	Engagement	A	A	B	A	Engagement		1
	Boston Trust Walden International Equity Fund	2015-06-09		D	Engagement	A	A	C	A	A	1	1
	Boston Trust Walden Midcap Fund	2011-08-01	Yes	D	Engagement	D	A	A	A	A	1	1
	Boston Trust Walden SMID Cap Fund	2012-06-28	Yes	D	Engagement	D	A	A	A	A	1	1
	Boston Trust Walden Small Cap Fund	2005-12-16		D	B	F	A	A	A	A	1	1
Brown Advisory Funds	Brown Advisory Sustainable Growth Fund	2012-06-29		A	B	C	A	B	D	A	1	1
Calvert Research and Management	Calvert Balanced Fund	1982-10-21	Yes	B	Engagement	A	A	B	A	B		1
	Calvert Emerging Markets Advancement Fund	2019-10-01		B	Engagement	N/A	A	A	A	A		1
	Calvert Emerging Markets Equity Fund	2012-10-31	Yes	A	Engagement	F	A	A	A	A	1	1
	Calvert Equity Fund	1987-08-24	Yes	A	Engagement	C	A	B	D	A	1	1
	Calvert Global Energy Solutions Fund	2007-07-31	Yes	C	Engagement	D	A	B	B	A	1	1
	Calvert Global Water Fund	2008-09-30	Yes	B	Engagement	C	A	A	B	A		1
	Calvert International Equity Fund	2019-03-07	Yes	B	Engagement	A	A	A	C	A		1
	Calvert International Opportunities Fund	2007-05-31	Yes	B	Engagement	D	A	A	C	A	1	1
	Calvert International Responsible Index Fund	2015-10-30		B	Engagement	B	A	F	C	B	1	1
	Calvert Mid-Cap Fund	1994-10-31	Yes	C	A	D	A	D	C	A	1	1
	Calvert Small-Cap Fund	2005-04-01	Yes	B	Engagement	F	A	B	A	A	1	1
	Calvert US Large-Cap Core Responsible Index Fund	2000-06-30	Yes	B	Engagement	B	B	C	B	B		1
	Calvert US Large-Cap Growth Responsible Index Fund	2015-06-19	Yes	B	Engagement	B	B	C	B	B		1
	Calvert US Large-Cap Value Responsible Index Fund	2015-06-19	Yes	C	Engagement	B	B	C	B	B		1
	Calvert US Mid-Cap Core Responsible Index Fund	2015-10-30		B	Engagement	D	B	C	C	B	1	1
Cavanal Hill funds	Cavanal Hill Mid Cap Diverse Leadership Fund	2016-12-30		C	D	D	A	A	C	A	1	1
Change Finance	Change Finance U.S. Large Cap Fossil Fuel Free ETF	2017-10-09		A	D	B	A	B	A	A	1	1
Changebridge	Changebridge Capital Sustainable Equity ETF	2020-11-12		A	B	D	A	B	A	B	1	1
Coho	Coho Relative Value ESG Fund	2019-11-27		A	B	A	A	B	A	A		1
Columbia Threadneedle	Columbia Sustainable International Equity Income ETF	2016-06-13		F	F	D	A	B	C	A	1	1
	Columbia Sustainable U.S. Equity Income ETF	2016-06-13		F	F	B	A	F	F	A	1	1
Community Capital Management	CCM Core Impact Equity Fund	2000-07-20		C	B	B	A	B	A	A		1
	CCM Small/Mid-Cap Impact Value Fund	1996-11-25		D	A	D	A	B	A	A	1	1
DWS	DWS ESG Core Equity Fund	2005-08-01		B	C	A	A	B	C	B		1
	DWS ESG International Core Equity Fund	2014-11-11		D	F	A	A	B	B	F	1	1
Dana Investment	Dana Epiphany ESG Equity Fund	2008-02-13		C	B	B	A	B	A	B		1
	Dana Epiphany ESG Small Cap Equity Fund	2015-11-03		C	B	F	A	A	C	A	1	1
Dimensional Fund Advisors	DFA Emerging Markets Sustainability Core 1 Portfolio	2018-03-27		B	D	N/A	A	A	F	A	1	1

	DFA International Sustainability Core 1 Portfolio	2008-03-12		B	D	C	A	F	C	B	1	1
	DFA U.S. Sustainability Core 1 Portfolio	2008-03-12		B	C	C	B	C	D	B	1	1
	DFA U.S. Sustainability Targeted Value Portfolio	2020-07-02		B	C	D	B	C	D	B	1	1
Direxion Funds	**Direxion MSCI USA ESG - Leaders vs. Laggards ETF**	2020-02-05		D	B	A	A	C	D	A	1	1
	Direxion World Without Waste ETF	2020-12-17		B	A	C	A	A	A	A		1
Domini	**Domini Impact Equity Fund**	2003-11-28	Yes	B	Engagement	A	A	C	A	B		1
	Domini Impact International Equity Fund	2018-07-23	Yes	B	Engagement	C	A	B	A	B		1
	Domini International Opportunities Fund	2020-11-30		B	Engagement	B	A	B	A	B		1
	Domini Sustainable Solutions Fund	2020-04-01		A	A	D	A	A	A	A	1	1
ETFMG	**Etho Climate Leadership U.S. ETF**	2015-11-18	Yes	A	B	D	A	C	B	B	1	1
Essex Funds	**Essex Environmental Opportunities Fund**	2017-09-01		A	A	F	A	A	A	A	1	1
Eventide Funds	**Eventide Dividend Opportunities Fund**	2017-09-29		A	B	D	A	A	A	A	1	1
	Eventide Exponential Technologies Fund	2020-06-30		A	A	F	A	A	A	A	1	1
	Eventide Gilead Fund	2008-07-08		A	B	D	A	A	A	A	1	1
	Eventide Healthcare & Life Sciences Fund	2012-12-27		A	A	N/A	A	A	A	A		1
	Eventide Multi-Asset Income Fund	2015-07-15		A	B	F	A	A	A	A	1	1
Federated	**Federated Hermes Global Equity Fund**	2019-04-23		C	D	B	A	B	A	B	1	1
	Federated Hermes SDG Engagement Equity Fund	2018-11-06		C	B	F	A	A	A	A	1	1
Fidelity Investments	**Fidelity® Intl Sustainability Idx Fd**	2017-05-09		C	D	B	A	B	B	B	1	1
	Fidelity® Select Envir and Alt Energy Portfolio	1989-06-29		C	B	D	A	B	F	A	1	1
	Fidelity® US Sustainability Index Fund	2017-05-09		B	C	A	A	C	B	B		1
	Fidelity® Water Sustainability Fund	2020-04-16		C	A	F	F	A	A	A	1	1
	Fidelity® Women's Leadership Fund	2019-05-01		B	B	A	A	C	D	B	1	1
First Trust	**First Trust EIP Carbon Impact ETF**	2019-08-20		F	A	C	A	A	A	A		1
	First Trust Global Wind Energy ETF	2008-06-16		F	B	A	A	A	F	A	1	1
	First Trust NASDAQ® Clean Edge® Green Energy Index Fund	2007-02-08		A	A	F	A	A	A	A	1	1
	First Trust NASDAQ® Clean Edge® Smart Grid Infrastructure Index Fund	2009-11-16		B	A	A	A	B	F	A	1	1
	First Trust Water ETF	2007-05-08		C	A	D	A	A	F	A	1	1
Firsthand Funds	**Firsthand Alternative Energy Fund**	2007-10-29		A	A	C	A	C	C	A		1
Fisher Investments	**Fisher Investments Institutional Group All Foreign Equity Environmental and Social Values Fund**	2020-07-17		D	B	C	A	C	A	A	1	1
	Fisher Investments Institutional Group ESG Stock Fund for Retirement Plans	2019-12-13		D	B	B	A	B	A	A	1	1
	Fisher Investments Institutional Group U.S. Large Cap Equity Environmental and Social Values Fund	2020-07-17		C	B	A	A	B	A	A		1
Flexshares Trust	**FlexShares STOXX Global ESG Impact Index Fund**	2016-07-13		D	D	A	A	F	C	C	1	1
	FlexShares STOXX US ESG Impact Index Fund	2016-07-13		D	C	A	A	C	C	D	1	1
Franklin Templeton Investments	**ClearBridge Dividend Strategy ESG ETF**	2017-05-22		D	D	A	A	B	D	B	1	1
	ClearBridge Large Cap Growth ESG ETF	2017-05-22		A	B	A	A	B	D	B	1	1
	ClearBridge Sustainability Leaders Fund	2015-11-02	Yes	B	B	A	A	B	D	B	1	1
Frontier Funds	**Frontier MFG Global Sustainable Fund**	2019-10-09		B	B	A	B	B	A	A		1
GMO	**GMO Climate Change Fund**	2017-04-05		F	F	D	A	A	A	A	1	1
Gabelli	**Gabelli ESG Fund**	2007-06-01	Yes	C	B	A	A	B	B	B		1
Glenmede	**Glenmede Responsible ESG U.S. Equity Portfolio**	2015-12-22		C	F	C	B	B	D	B	1	1
	Glenmede Women in Leadership U.S. Equity Portfolio	2015-12-22		C	F	B	A	C	B	B	1	1
Global X Funds	**Global X CleanTech ETF**	2020-10-27		A	A	C	A	A	A	A		1
	Global X Conscious Companies ETF	2016-07-11		C	D	A	A	C	C	B	1	1
Goldman Sachs	**Goldman Sachs Clean Energy Income Fund**	2020-06-26		F	A	B	A	A	A	A	1	1
	Goldman Sachs ESG Emerging Markets Equity Fund	2018-05-31		B	B	N/A	A	A	A	A		1

	Goldman Sachs International Equity ESG Fund	1992-12-01		B	D	A	A	B	A	A	1	1
	Goldman Sachs JUST U.S. Large Cap Equity ETF	2018-06-07		C	C	A	B	D	D	B	1	1
Gotham	Gotham ESG Large Value Fund	2018-12-28		C	D	B	A	D	F	B	1	1
Great-West Funds	Great-West Ariel Mid Cap Value Fund	2015-05-01		B	B	C	A	B	A	B		1
Green Century	Green Century Balanced Fund	2020-11-30	Yes	A	Engagement	B	A	B	B	A		1
	Green Century Equity Fund	2018-04-30	Yes	A	Engagement	A	A	C	B	Engagement		1
	Green Century MSCI International Index Fund	2016-09-30	Yes	B	Engagement	A	A	A	B	Engagement		1
Guinness Atkinson	Guinness Atkinson Alternative Energy Fund	2006-03-31		D	A	D	A	A	A	A	1	1
Hartford Mutual Funds	Hartford Climate Opportunities Fund	2016-02-29		D	C	D	A	B	B	A	1	1
	Hartford Global Impact Fund	2017-02-28		A	B	D	A	A	C	A	1	1
Highland Funds	Highland Socially Responsible Equity Fund	1999-09-30		A	B	A	A	B	A	B		1
Horizon Investments	Horizon ESG Defensive Core Fund	2019-12-27		B	C	A	A	B	C	B		1
Humankind	Humankind US Stock ETF	2021-02-24		A	D	B	B	C	D	B	1	1
Impact Shares	Impact Shares NAACP Minority Empowerment ETF	2018-07-12		C	C	A	A	B	D	B	1	1
	Impact Shares Sustainable Development Goals Global Equity ETF	2018-09-24		B	C	A	A	C	B	B		1
	Impact Shares YWCA Women's Empowerment ETF	2018-08-24		B	C	A	A	C	B	B		1
IndexIQ	IQ Candriam ESG International Equity ETF	2019-12-16		F	F	A	A	F	B	B	1	1
	IQ Candriam ESG US Equity ETF	2019-12-16		B	C	B	A	C	B	B		1
	IQ Healthy Hearts ETF	2021-01-14		A	B	A	A	C	A	A		1
Inspire	Inspire Faithward Large Cap Momentum ESG ETF	2020-12-07		B	B	D	A	B	A	A	1	1
	Inspire Faithward Mid Cap Momentum ESG ETF	2020-12-07		A	A	F	A	A	A	A	1	1
	Inspire Small/Mid Cap Impact ETF	2017-02-27		D	B	F	D	F	B	A	1	1
	Inspire Tactical Large Cap ESG ETF	2020-07-15		D	C	F	A	B	F	A	1	1
IntegrityVikingFunds	Integrity ESG Growth & Income Fund	1995-01-03		B	B	A	A	B	A	B		1
Invesco	Invesco Cleantech™ ETF	2006-10-24		A	A	C	A	A	A	A		1
	Invesco Global Clean Energy ETF	2007-06-13		A	B	N/A	A	A	A	A		1
	Invesco Global Water ETF	2007-06-13		B	A	B	A	A	A	A		1
	Invesco MSCI World SRI Index Fund	2016-07-01		B	D	B	A	B	B	B	1	1
	Invesco Real Assets ESG ETF	2020-12-18		F	F	C	A	A	A	A		1
	Invesco S&P Global Water Index ETF	2007-05-14		C	A	B	F	A	A	A		1
	Invesco Solar ETF	2008-04-15		A	A	N/A	A	A	A	A		1
	Invesco US Large Cap Core ESG ETF	2020-12-18		C	B	A	A	D	A	B	1	1
	Invesco Water Resources ETF	2005-12-06		A	A	F	A	A	A	A		1
	Invesco WilderHill Clean Energy ETF	2005-03-03		A	A	N/A	A	A	A	A		1
JPMorgan	JPMorgan Carbon Transition U.S. Equity ETF	2020-12-09		C	B	A	B	C	D	D	1	1
	JPMorgan U.S. Sustainable Leaders Fund	2020-10-01		B	B	A	A	B	C	B		1
Jackson National	JNL/Mellon MSCI KLD 400 Social Index Fund	2017-09-25		B	C	A	A	C	B	B		1
Janus Henderson	Janus Henderson Global Sustainable Equity Fund	2020-06-25		B	B	D	A	B	A	A	1	1
John Hancock	John Hancock ESG All Cap Core Fund	2016-06-06		A	B	B	A	B	A	A		1
	John Hancock ESG International Equity Fund	2016-12-14		A	B	C	A	A	A	A		1
	John Hancock ESG Large Cap Core Fund	2016-06-06		A	B	A	A	B	A	A		1
KBI	KBI Global Investors Aquarius Fund	2018-10-12		A	A	B	A	D	A	A	1	1
Kayne Anderson	Kayne Anderson Renewable Infrastructure Fund	2020-07-23		F	A	A	A	A	A	A		1
Kennedy Capital Management	Kennedy Capital ESG SMID Cap Fund	2019-06-28	Yes	B	D	D	A	B	C	A	1	1
KraneShares	KraneShares MSCI China ESG Leaders Index ETF	2020-07-29		C	B	F	A	A	A	A	1	1
	KraneShares MSCI China Environment Index ETF	2017-10-12		B	A	F	A	A	A	A	1	1
Lateef	Lateef Focused Sustainable Growth Fund	2007-09-06		A	B	B	A	B	D	A	1	1
Lazard	Lazard US Sustainable Equity Portfolio	2020-06-30		A	B	B	A	C	D	B	1	1

MassMutual	**MassMutual Premier Balanced Fund**	2014-04-01		C	C	B	A	B	B	B		1
Matthews Asia Funds	**Matthews Asia ESG Fund**	2015-04-30		A	B	N/A	A	A	A	A		1
Mesirow Financial	**Mesirow Financial Small Cap Value Sustainability Fund**	2018-12-19		D	B	F	A	A	B	A	1	1
Morgan Stanley	**Morgan Stanley Institutional Fund, Inc. Global Sustain Portfolio**	2015-04-30		A	B	A	A	B	D	A	1	1
Nationwide	**Nationwide Global Sustainable Equity Fund**	1997-06-30		C	F	C	A	B	A	B	1	1
Natixis Funds	**Mirova Global Sustainable Equity Fund**	2016-03-31	Yes	B	B	C	A	B	C	A		1
	Mirova International Sustainable Equity Fund	2018-12-28	Yes	A	B	B	A	A	A	A		1
	Natixis Sustainable Future 2030 Fund	2017-02-28		B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2035 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2040 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2045 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2050 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2055 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
	Natixis Sustainable Future 2060 Fund	2017-02-28	Yes	B	C	C	A	C	C	B		1
Neuberger Berman	**Neuberger Berman Advisers Management Trust Sustainable Equity Portfolio**	1999-02-18		B	B	A	A	B	A	B		1
	Neuberger Berman Sustainable Equity Fund	1997-03-03	Yes	B	B	A	A	B	A	B		1
New Age Alpha	**AVDR US LargeCap ESG ETF**	2020-12-29		B	B	A	B	B	B	F	1	1
New Alternatives	**New Alternatives Fund**	2015-01-02	Yes	F	A	D	A	A	A	A	1	1
Northern Funds	**Northern Global Sustainability Index Fund**	2020-07-31		C	C	B	A	C	B	B		1
	Northern U.S. Quality ESG Fund	2020-08-21		B	D	A	A	D	D	B	1	1
Old Westbury	**Old Westbury All Cap ESG Fund**	2018-03-01		C	D	B	A	F	F	B	1	1
PIMCO	**PIMCO RAFI ESG U.S. ETF**	2019-12-18		B	D	A	A	B	A	B	1	1
Parnassus	**Parnassus Core Equity Fund**	1992-08-31	Yes	A	B	B	A	B	A	B		1
	Parnassus Endeavor Fund	2015-04-30	Yes	A	B	A	A	B	A	A		1
	Parnassus Mid Cap Fund	2005-04-29	Yes	C	B	D	A	A	A	A	1	1
	Parnassus Mid Cap Growth Fund	1984-12-27	Yes	A	B	D	A	F	A	A	1	1
Pax World	**PAX ESG BETA DIVIDEND FUND**	2016-12-16	Yes	A	Engagement	A	A	B	A	B		1
	PAX LARGE CAP FUND	2016-12-16	Yes	A	Engagement	A	A	B	A	B		1
	Pax ESG Beta Quality Fund	1997-06-11	Yes	B	Engagement	B	A	B	B	B		1
	Pax Ellevate Global Women's Leadership Fund	1993-10-01	Yes	B	Engagement	A	A	B	B	B		1
	Pax Global Environmental Markets Fund	2013-05-01	Yes	A	Engagement	D	A	A	A	A	1	1
	Pax Global Opportunities Fund	2018-06-27		A	Engagement	C	A	B	A	A		1
	Pax MSCI EAFE ESG Leaders Index Fund	2014-03-31	Yes	B	Engagement	A	A	B	B	B		1
	Pax Small Cap Fund	2008-03-27	Yes	B	Engagement	D	A	A	C	B	1	1
Pioneer Investments	**Pioneer Balanced ESG Fund**	2005-09-23		B	B	A	A	D	C	B	1	1
Praxis Mutual Funds	**Praxis Growth Index Fund**	2007-05-01	Yes	B	B	B	A	B	B	Engagement		1
	Praxis International Index Fund	2010-12-31	Yes	C	F	C	A	C	B	Engagement	1	1
	Praxis Small Cap Index Fund	2007-05-01	Yes	B	B	D	A	C	B	A	1	1
	Praxis Value Index Fund	2001-05-01	Yes	D	D	A	B	B	B	Engagement	1	1
Putnam	**Putnam Sustainable Future Fund**	2003-04-01		B	B	D	A	A	C	A	1	1
	Putnam Sustainable Leaders Fund	1999-07-26		C	B	A	B	B	D	A	1	1
Riverbridge	**Riverbridge Eco Leaders® Fund**	2014-12-31		A	B	D	A	B	A	A	1	1
Russell	**Sustainable Equity Fund**	2008-09-02		B	C	C	A	C	D	B	1	1
SPDR State Street Global Advisors	**SPDR® Kensho Clean Power ETF**	2018-10-19		F	A	D	A	A	D	A	1	1
	SPDR® MSCI ACWI Low Carbon Target ETF	2014-11-25		C	C	C	B	F	C	D	1	1
	SPDR® MSCI EAFE Fossil Fuel Reserves Free ETF	2016-10-24		B	D	B	A	F	C	D	1	1
	SPDR® MSCI Emerging Markets Fossil Fuel Reserves Free ETF	2016-10-24		B	D	N/A	A	A	B	C	1	1
	SPDR® S&P 500 Fossil Fuel Reserves Free ETF	2015-11-30		C	C	A	B	D	D	D	1	1
	SPDR® S&P 500® ESG ETF	2020-07-27		C	C	A	A	C	B	B		1
	SPDR® SSGA Gender Diversity Index ETF	2016-03-07		C	B	A	A	C	C	B		1
Saturna Sustainable Funds	**Saturna Sustainable Equity Fund**	2015-03-27	Yes	A	B	A	A	B	A	B		1
Segall Bryant & Hamill	**Segall Bryant & Hamill Workplace Equality Fund**	1988-06-01		B	B	B	B	D	C	B	1	1
Shelton Capital Management	**Shelton Green Alpha Fund**	2013-03-12		A	B	D	A	B	A	A	1	1
Sit	**Sit ESG Growth Fund**	2016-07-01		A	B	A	A	C	F	B	1	1

SmartETFs	SmartETFs Sustainable Energy II ETF	2020-11-11		D	A	C	A	A	A	A	1	1
TCW	TCW New America Premier Equities Fund	2016-01-29		A	A	D	A	B	A	A	1	1
TIAA Investments/Nuveen	Nuveen ESG Emerging Markets Equity ETF	2017-06-06		C	D	N/A	A	A	A	A		1
	Nuveen ESG International Developed Markets Equity ETF	2017-06-06		C	F	A	A	F	B	B	1	1
	Nuveen ESG Large-Cap ETF	2019-06-03		C	C	A	A	B	B	B		1
	Nuveen ESG Large-Cap Growth ETF	2016-12-13		A	B	C	A	B	B	B		1
	Nuveen ESG Large-Cap Value ETF	2016-12-13		D	D	A	A	C	A	B	1	1
	Nuveen ESG Mid-Cap Growth ETF	2016-12-13		A	B	D	A	A	C	A	1	1
	Nuveen ESG Mid-Cap Value ETF	2016-12-13		D	F	C	A	D	A	A	1	1
	Nuveen ESG Small-Cap ETF	2016-12-13		C	B	D	A	C	B	A	1	1
	Nuveen Winslow Large-Cap Growth ESG Fund	2009-05-15		A	B	A	A	B	C	B		1
	TIAA-CREF Social Choice Equity Fund	2009-09-30	Yes	C	C	B	A	C	C	A		1
	TIAA-CREF Social Choice International Equity Fund	2015-08-07		D	F	A	A	B	B	B	1	1
	TIAA-CREF Social Choice Low Carbon Equity Fund	2015-08-07		C	C	B	A	C	C	A		1
Third Avenue	Third Avenue International Real Estate Value Fund	2018-04-20		A	A	B	A	A	A	A		1
Thornburg	Thornburg Better World International Fund	2015-09-30		C	F	A	A	B	A	B	1	1
Tortoise Capital Advisors	Ecofin Global Renewables Infrastructure Fund	2020-08-07		F	A	B	A	A	A	A	1	1
	Ecofin Global Water ESG Fund	2017-02-14		A	A	B	A	A	A	A		1
Touchstone	Touchstone Global ESG Equity Fund	2003-10-06		B	B	B	A	B	A	B		1
	Touchstone International ESG Equity Fund	2007-12-03		C	B	B	A	A	B	B		1
Transamerica	Transamerica Sustainable Equity Income Fund	2013-01-04		A	B	A	A	B	A	A		1
Trillium Mutual Funds	Trillium ESG Global Equity Fund	2007-03-30	Yes	A	Engagement	B	A	B	C	A		1
	Trillium ESG Small/Mid Cap Fund	2015-08-31	Yes	B	Engagement	D	A	A	A	A	1	1
TrimTabs	TrimTabs International Free Cash Flow Quality ETF	2017-06-27		C	D	B	A	D	A	C	1	1
	TrimTabs U.S. Free Cash Flow Quality ETF	2016-09-27		C	B	B	B	C	B	D	1	1
TrueShares	TrueShares ESG Active Opportunities ETF	2020-02-28		B	B	A	A	B	A	B		1
Tuttle	Trend Aggregation ESG ETF	2020-05-07		B	B	C	B	B	B	B		1
UBS Asset Management	UBS Engage For Impact Fund	2018-10-24		C	F	D	A	A	A	A	1	1
	UBS International Sustainable Equity Fund	1993-08-31		C	F	C	A	A	A	B	1	1
	UBS U.S. Sustainable Equity Fund	1997-06-30		A	B	C	A	B	A	A		1
VALIC	VALIC Company I International Socially Responsible Fund	1989-10-02		D	F	B	A	F	B	B	1	1
	VALIC Company II U.S. Socially Responsible Fund	1998-09-21		C	C	B	A	C	B	B		1
VanEck	VanEck Vectors Environmental Services ETF	2006-10-10		A	A	F	A	A	A	A	1	1
	VanEck Vectors Low Carbon Energy ETF	2007-05-03		C	A	D	A	A	A	A	1	1
Vanguard	Vanguard ESG International Stock ETF	2018-09-18		B	D	C	A	F	B	B	1	1
	Vanguard ESG U.S. Stock ETF	2018-09-18		B	C	B	B	C	B	B		1
	Vanguard FTSE Social Index Fund	2019-02-07		B	C	A	A	C	A	B		1
	Vanguard Global ESG Select Stock Fund	2019-06-05		B	B	A	A	B	A	A		1
Vert Asset Management	Vert Global Sustainable Real Estate Fund	2017-10-31	Yes	A	A	A	A	A	A	A		1
Victory Capital	USAA Sustainable World Fund	2015-08-10		D	C	B	A	C	D	D	1	1
Virtus	Virtus AllianzGI Global Sustainability Fund	2014-12-09		B	B	A	A	B	A	A		1
	Virtus AllianzGI Water Fund	2008-03-31		C	A	C	A	A	A	A		1
WCM Investment Management	WCM Focused ESG Emerging Markets Fund	2020-03-31		B	F	D	A	B	A	A	1	1
	WCM Focused ESG International Fund	2020-03-31		B	F	C	A	B	A	A	1	1
WisdomTree	WisdomTree Emerging Markets ESG Fund	2016-04-07		B	D	N/A	A	A	A	A	1	1
	WisdomTree International ESG Fund	2016-11-03		B	C	A	A	B	C	B		1
	WisdomTree U.S. ESG Fund	2007-02-23		B	D	B	A	C	B	B	1	1
Xtrackers	Xtrackers MSCI ACWI ex USA ESG Leaders Equity ETF	2018-12-04		D	D	B	A	B	B	B	1	1
	Xtrackers MSCI EAFE ESG Leaders Equity ETF	2018-09-05		D	D	A	A	B	B	B	1	1

	Xtrackers MSCI Emerging Markets ESG Leaders Equity ETF	2018-12-04	D	D	N/A	A	A	A	A	1	1
	Xtrackers MSCI USA ESG Leaders Equity ETF	2019-03-06	B	C	A	A	C	B	B		1
	Xtrackers S&P 500 ESG ETF	2019-06-25	C	C	A	A	C	B	B		1
										174	296
										0.587838	