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HARRINGTON
INVESTMENTS, INC.

October 15, 2014

Mary Jo White
Chair, Securities and Exchange Commission

Keith Higgins
Director, Corporate Finance Division, Securities and Exchange Commission

Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Disclosure Effectiveness Review

Dear Chair White and Director Higgins,

Thank you for this important work reviewing the business and financial disclosures currently required of public companies in Forms 10-K, 10-Q, and 8-K. Harrington Investments, Inc. (HII) welcomes the opportunity to comment on the ongoing review and encourages staff to continue building on preliminary recommendations for more efficient, diverse, and effective disclosure requirements.

HII has been a leader in Socially Responsible Investing and Shareholder Advocacy since 1982. Dedicated for more than 30 years to managing portfolios maximizing financial, social and environmental performance, we have been active shareholder advocates for more disclosure from public companies on issues including political spending, human rights violations, governance and climate change.

Contrary to position statements from the Chamber of Commerce and the Corporate Secretaries, investors are not in danger of disclosure overload. We believe, and have seen first-hand through working with individuals, families, and institutions, that more disclosure—never less—helps investors make more informed decisions around the ***long term*** financial health of any company.

While political spending is one issue that has captured the attention of many investors in recent years, reports show an astounding 20,000-fold increase in demand by investors for Environmental, Social, and Governance (ESG) disclosures since investors began petitioning the SEC for such disclosures in the mid-1970's. The sheer force of that increased demand should be enough to compel publicly traded corporations to begin to see that disclosures are indeed increasingly material to an understanding of the company's financial performance, and absolutely appropriate for inclusion in disclosures. Hopefully the SEC will not remain behind the curve alongside the Secretaries and Chamber. If concerned about more demand for more disclosure, the SEC might consider looking only slightly into the future where our next generation of investment beneficiaries is demanding, by an overwhelming majority, that companies not only disclose their ESG metrics, but actually do something to make those metrics improve.

Disclosure and transparency are the cornerstones for effective and efficient decision making by—and protection for—investors and the general public. The SEC has proven it can evolve with changing circumstances and markets and be responsive to investor demands, and we will look forward to the Commission's resolution of questions about disclosure in favor of those the rules are designed to protect.

Sincerely,

John Harrington,
President and CEO, Harrington Investments