



# Dominican Sisters of Hope

## FINANCE OFFICE

July 13, 2016

Via email to rule-comments@sec.gov

Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: **File Number S7-06-16 - Regulation S-K** Concept Release on  
Business and Financial Disclosure Required by Regulation S-K

Dear Mr. Fields:

I am writing to comment on behalf of the Dominican Sisters of Hope regarding the Regulation S-K Concept Release, File Number S7-06-16. I am writing in response to the questions regarding the role of the SEC in encouraging sustainability reporting.

The Dominican Sisters of Hope is a Roman Catholic religious order of women committed to living and preaching the gospel message of hope. ([ophope.org](http://ophope.org)) Assets under management are in excess of \$200 million dollars. Investments are for the care of the Dominican Sisters and carrying out of its mission i.e. living and preaching the gospel message of hope.

The Dominican Sisters of Hope strongly supports the establishment of enforceable SEC requirements for companies to report on sustainability issues, particularly in the context of our common world environment. Such reporting is arguably already required by Regulation S-K, as demonstrated by the SEC's 2010 Interpretative Guidance on Disclosures Regarding Climate Change. Yet current disclosures of sustainability issues by registrants do not satisfy our needs as investors. Care of the earth and its peoples are major concerns for the Sisters and as active investors, the Dominicans are engaged in dialogue and filing resolutions with a small number of corporations on a limited number of issues. We seek corporations with sound, and sustainable, environmental and human rights practices. We recognize that many corporations are just beginning to realize that such practices may lead to sustainability for the future of the business.

Voluntary reporting frameworks provide information on many companies but they do not provide consistency across companies and sectors, nor do they provide the checks on accuracy and completeness that are inherent in securities filings.

We urge the SEC to establish sustainability reporting requirements as part of companies' annual filing requirements.

Yours truly,

Valerie Heinonen, o.s.u.  
Director, Shareholder Advocacy