FONDS
de solidarité FTQ

545, boulevard Crémazie Est
Bureau 200
Montréal (Québec) H2M 2W4
Tél. : 514 383-8383
1 800 361-5017
Téléc. : 514 383-2502
www.fondsftq.com

November 27th, 2013

Ms. Elizabeth M. Murphy
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: File Number S7-07-13 - Comments on amendments to Item 402 of Regulation S-K to require Pay Ratio Disclosure

Dear Ms. Murphy,

We, the undersigned investors with 9.3 billions $ assets under management, are writing to express strong support for the U.S. Securities and Exchange Commission's proposal requiring disclosure of the CEO-to-worker pay ratio as mandated by Section 953(b) of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As long-term investors in publicly traded corporations, we believe that requiring disclosure of the CEO-to-worker pay ratio data will be beneficial for investors. Unless pay ratio is disclosed, it cannot be priced by investors on capital markets. For the reasons set forth below, the disclosure of pay ratio between CEO and worldwide employees are material to investors who invest in U.S. equity markets.

The ratio of CEO to worker pay at individual companies is material information for investors. High pay disparities inside a company can be detrimental to employee motivation and productivity, increase turnover and have a negative impact on a company's overall performance.1

Moreover, disclosure of the median employee pay will help investors better understand companies' overall compensation approach to developing their human capital. Investors will be able to use CEO-to-worker pay ratios (vertical comparison) in the context of companies' internal compensation structures and thereby enable assessment of employment practices. This information will complement existing metrics such as peer benchmarking (horizontal comparison) for evaluating say-on-pay votes and other executive compensation issues. Investors will be able to see how the ratio changes over time at individual companies, compare companies within industries and tie this to long term value.

As required by Dodd-Frank Section 953(b), the proposed rule appropriately requires companies to disclose the median pay of all of their employees. Given recent labor market trends, many publicly traded companies across industrial sectors employ a majority of international employees or part-time employees. For example, 57% of Alcoa's 61,000 workers are employed outside of the U.S., 55% of the Coca-Cola Company's 150,900 workers are employed outside of the U.S. and 50% of Cisco's 75,049 workers are employed outside of the U.S. Investors will receive an incomplete picture of their company's pay practices if international & part time employees are excluded from the disclosure.

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1 See e.g.: Jeffrey Pfeffer, Human Resources from an Organizational Behavior Perspective: Some Paradoxes Explained, Journal of Economic Perspectives, Vol. 21 (2007). See also Bebchuk, Lucian A., K. J. Cremers, and Urs
C. Peyer. "The CEO pay slice." Journal of Financial Economics 102.1 (2011): 199-221.

We commend the Commission for proposing to reduce compliance costs as much as possible without reducing the benefits to investors. The proposed rule gives companies considerable flexibility through sampling or using payroll data to calculate the median. We also support the Commission's proposal to permit companies to provide supplemental disclosure on their overall workforce compensation practices.

We would appreciate a swift adoption of the final rule to implement Section 953(b) of the Dodd Frank Act. Investors will benefit from this disclosure in proxy voting on executive compensation and in making investment decisions based on workforce considerations. The United States, the largest financial centre by market capitalisation, would establish itself as a leader over pay ratio disclosure and facilitate the adoption of such a disclosure in other jurisdictions where we invest. Given the flexibility that the Commission has provided to companies to comply with the proposed rule, the benefits for investors outweigh the costs of compliance.

Thank you for your consideration of our viewpoints.

Sincerely,

Yvan Bolduc
President and Chief Executive Officer

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