

JT Foxx Reviews The SEC.GOV Modernization of Regulation S-K

The JT Foxx Review team, believes that firms that cautiously deal with the societal and governance (ESG) issues encountered within their professions can be very well placed to outshine their competitors over the longer term.

The JT Foxx Reviews Research Unit reviews, and takes very seriously our own human capital management procedures. We have found that businesses that attract, develop and retain high quality workers are most likely to be more effective performers.

Investment perils related to unsatisfactory human capital control have come to the headlines recently with cases of sexual harassment and race discrimination.

Analysis suggests that reducing harassment in the place of work requires a focus on recruiting and advancing more women. Having said that, such selection must not simply be to fill a quota, but based on merit. When females who have matching or better skills than their male job search competitors are selected, then evidence suggests that the resulting, broader, diversified labor force leads to improved business outcomes.

In "Economic Geography, Cultural Diversity, Innovation and Entrepreneurship: Firm-level Evidence from London; M. Nathan, N. Lee; October, 2015", it was determined that "Innovation also benefits from diversity. Pooled data from more than 7000 firms revealed that businesses run by culturally diverse leadership teams were more likely to develop new products than those with less diverse leadership."

In conclusion, I highly recommend that your panel directly resolves and simplifies the guidelines to weigh the priorities of all stakeholders carefully. Perhaps, we can find a workable balance? I am certain that we can gain from an equity-based, flexible approach that balances the contribution and needs of all involved.

Respectfully submitted

JT Foxx Reviews Research Team

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