

RESEARCH MEMORANDUM

To: Interested Parties

From: American Accountability Foundation Research Team

Date: January 24, 2024

Re: Investment Managers are Using Nevada Pension Funds to Push a Woke Agenda

HOW THE ESG MOVEMENT USES NEVADA PENSION FUNDS TO PUSH A WOKE AGENDA

If you are wondering why corporate America went so woke, so quickly, the answer to that question is simple – the ESG Movement – with “ESG” standing for environmental, social, and governance. The ESG Movement is comprised of a network of left-wing groups that have allied with seemingly mainstream Wall Street investment firms.

This unlikely alliance of progressive activist groups and mainstream Wall Street firms has culminated in a multi-year effort to force corporations across America to adopt woke policies. Whether it is DEI initiatives, climate alarmism, or efforts to defund conservative and pro-business organizations, the ESG Movement has been at the forefront of pushing these changes in recent years.

The primary tool used by ESG Movement to advance their left-wing agenda in corporate America is the shareholder resolution. Each year at the annual shareholder meetings of public companies, shareholders can put forward resolutions to force action by corporate boards and management. While shareholder resolutions have typically been used to further good corporate governance practices and to maximize returns for shareholders, the ESG Movement has co-opted the shareholder resolution process to force companies to implement DEI, anti-oil and gas climate policy, and other radical social policy.

The mechanism is simple, liberal groups such as left-wing non-profits, unions, progressive state treasurers, and individual liberal activists purchase a de minimis number of shares in a public company for the purpose of qualifying to put forward a pro-ESG shareholder resolution. Large investment management firms – most often typified by BlackRock, Vanguard, and State Street – then use the stock holdings in the large funds they manage to vote in favor of the ESG shareholder resolutions. Importantly, this is not BlackRock, Vanguard, or State Street’s money – but instead the money of the firms’ asset management clients that the asset managers are weaponizing to vote in favor of ESG policies.



Importantly, the Nevada Public Employee Retirement System (NVPERS), uses asset managers that support the ESG Agenda. These asset managers – BlackRock, AllianceBernstein, Mellon Capital, and State Street Global Advisors (SSgA) – combined manage a total of over \$30.7 billion¹ of NVPERS’s stock portfolio. And, as detailed in this memo, have weaponized that money – the money of NVPERS pension beneficiaries – to support woke, pro-ESG shareholder proposals.

PERS' Investment Managers			
September 30, 2023			
<u>Firm</u>	<u>Retained</u>	<u>Assets (Millions)</u>	<u>Mandate</u>
AEW	2012	\$1,495	Private Real Estate
AllianceBernstein	1986	\$11,075	U.S. Stock Index
BlackRock	2003	\$11,104	U.S. Stock Index
Invesco Realty Advisors	1992	\$1,474	Private Real Estate
Mellon Capital	2003	\$4,288	International Stock Index
Pathway Capital	1986	\$4,813	Private Equity
Payden & Rygel	2003	\$7,860	U.S. Bond Index
SSgA	2014	\$4,292	International Stock Index
SSgA	2019	\$7,796	U.S. Bond Index

NVPERS’ ASSET MANAGERS SUPPORT DEI, ANTI-OIL & GAS CLIMATE POLICY, AND DEFUNDING CONSERVATIVES

The American Accountability Foundation sent a Nevada Public Records Act request to NVPERS requesting all reports of proxy votes cast by NVPERS asset managers since 2022. AAF reviewed these files for votes cast in support of woke corporate policies. All told we found 201 votes supporting policies such as racial equity audits, gender pay gap reports, efforts to defund conservative groups and trade associations, and radical climate policy.

While it would be redundant to review all 201 problematic votes, our research found that the problematic votes largely fell into three categories: “racial equity audits”, political contribution and free speech coercion, and anti-oil and gas resolutions. Below we highlight four resolutions that serve as exemplars of the resolutions proposed in these issue areas.

ALLIANCEBERNSTEIN USED NVPERS FUNDS TO SUPPORT A RACIAL EQUITY AUDIT AT COMCAST

¹ NVPERS, Investment Managers as of [September 30, 2023](#)



In June 2023, AllianceBernstein voted NVPERS' shares in Comcast Corporation in support of a resolution to “oversee and report on a racial equity audit”:²

Issuer Name	Meeting Date	Shares Voted	Proposal Number	Proposal Text	Proponent	Mgmt Rec	Vote Instruction
Comcast Corporation	06/07/2023	1,406,842	7	Oversee and Report on a Racial Equity Audit	SH	Against	For

The shareholder resolution was introduced by the SEIU Master Trust. The resolution urged the board of directors to “oversee an independent racial equity audit analyzing Comcast’s adverse impacts on nonwhite stakeholders,” decried “systemic racism,” admonished Comcast for sponsoring the Philadelphia Police Foundation’s annual gala, and criticized the company for donating to candidates that support voter ID requirements and objected to the results of the 2020 election:³

The following proposal and supporting statement were submitted by the SEIU Master Trust, 1800 Massachusetts Ave NW, Suite 301, Washington, D.C. 20036 and various co-filers.

Supporting Statement

RESOLVED that shareholders of Comcast Corporation (“Comcast”) urge the Board of Directors to oversee an independent racial equity audit analyzing Comcast’s adverse impacts on nonwhite stakeholders and communities of color and describing the steps, if any, Comcast plans to take to mitigate those impacts. Input from civil rights organizations, employees, and customers should be considered in determining the specific matters to be analyzed. A report on the audit, prepared at reasonable cost and omitting confidential and proprietary information, should be publicly disclosed on Comcast’s website.

SUPPORTING STATEMENT

High-profile police killings of Black people have galvanized the movement for racial justice. That movement, together with the disproportionate impacts of the COVID-19 pandemic, have focused the attention of the media, the public and policy makers on systemic racism, racialized violence and other inequities.

Several aspects of Comcast’s business and operations suggest that a racial equity audit would be useful. Although Comcast touts the fact that its diversity programs have resulted in the “most inclusive employee representation” since Comcast began reporting diversity data,¹ representation in senior management continues to lag. According to EEO-1 data for 2021, only 6.6% of Comcast’s executives/senior officers are Black, compared to 18.1% of the workforce generally.²

In October 2020, Comcast entered into a conciliation agreement with the U.S. Labor Department to resolve allegations of pay discrimination against Black and Latino

² AllianceBernstein [12-30-22 to 6-30-23 Proxy Votes](#) Received from NVPERS Public Records Request, Line 6209

³ SEC EDGAR, Comcast [2023 Proxy Statement](#)



employees. Comcast denied the allegations, but agreed to back pay and interest plus salary adjustments.³

Comcast has sponsored the Philadelphia Police Foundation's annual gala,⁴ though donor information is no longer provided on the organization's web site. Police foundations bypass normal procurement processes to buy equipment for police departments, including surveillance technology used to target communities of color and nonviolent protestors.⁵

Despite claiming that "[e]fforts to limit or impede access to this vital constitutional [voting] right for any citizen are not consistent with our values," Comcast donated to several state lawmakers who sponsored legislation restricting access to voting. Among those recipients was Florida state senator Dennis Baxley, the only sponsor of a bill, later signed into law, that criminalized providing water to voters in line and limited availability of drop boxes, among other measures.⁶ Voting restrictions have already exacerbated racial turnout gaps, and two states that adopted them are being sued for intentionally discriminating against nonwhite voters.⁷

During the 2022 election cycle, Comcast's political action committee gave \$365,000 to members of Congress who voted to overturn the results of the presidential election,⁸ an action some viewed as an "attack on the voting rights of people of color."⁹ Trade associations of which Comcast is a member have also donated to election objectors.¹⁰

We urge Comcast to assess its behavior through a racial equity lens in order to obtain a complete picture of how it contributes to, and could help dismantle, systemic racism.

ALLIANCEBERNSTEIN USED NVPERS FUNDS TO SUPPORT A RACIAL EQUITY AUDIT AT WALMART

In May 2023, Alliance Bernstein voted NVPERS' shares in Walmart in favor of a resolution calling for the commissioning of a "third party racial equity audit":⁴

Issuer Name	Meeting Date	Shares Voted	Proposal Number	Proposal Text	Proponent	Mgmt Rec	Vote Instruction
Walmart Inc.	05/31/2023	468,991	7	Commission Third Party Racial Equity Audit	SH	Against	For

The resolution, introduced by United for Respect, called for a "third-party, independent racial equity audit analyzing Walmart's adverse impacts on Black, Indigenous, and People of Color (BIPOC) communities" and said that Walmart "must do more to address significant adverse impacts of its policies and practices on those communities".⁵

⁴ AllianceBernstein [12-30-22 to 6-30-23 Proxy Votes](#) Received from NVPERS Public Records Request, Line 5903

⁵ SEC EDGAR, Walmart [2023 Proxy Statement](#)



The Organization United for Respect and various co-filers have advised that it or an appointed representative will present the following proposal for consideration at the 2023 Annual Shareholders' Meeting.

RESOLVED: Shareholders request Walmart Inc. ("Walmart" or the "Company") conduct a third-party, independent racial equity audit analyzing Walmart's adverse impacts on Black, Indigenous and People of Color (BIPOC) communities, and to provide recommendations for improving the company's racial equity impact. Input from employees, customers, and racial justice, labor, and civil rights organizations should be considered in determining specific matters to be analyzed. A report on the audit, prepared at reasonable cost and omitting confidential and proprietary information, should be published on Walmart's website.

Supporting Statement:

The harmful impacts of systemic racism on BIPOC communities are a major focus of policymakers, media, and the public. While Walmart has made charitable contributions¹ and statements of solidarity with communities of color, it must do more to address significant adverse impacts of its policies and practices on those communities.

Several aspects of Walmart's business suggest a racial equity audit would help mitigate reputational, regulatory, legal, and human capital risk. In recent years, Walmart has faced negative media coverage related to claims of discrimination including racial profiling² and discriminatory hiring, recruitment³ and promotion practices.⁴ Walmart is also subject to criticism for poor working conditions⁵ and paying low wages⁶. The Company does not disclose median or adjusted racial pay gaps.

By Walmart's own disclosures, it is clear more can be done to address racial inequality in its workforce. The Company reports that people of color comprise 49% of its U.S. workforce but make up only 27% of its U.S. Officers and 18% of its Board of Directors.⁷ As the largest private employer in the United States, it is imperative that Walmart ensure its policies and practices do not have adverse impacts on its BIPOC employees.

Political spending and lobbying may have adverse racial impacts. Between 2021 and 2022, the National Retail Federation (NRF), the industry trade association to which Walmart belongs, spent over \$14 million on lobbying⁸, and Walmart spent \$11.4 million over the same period.⁹ NRF's policy priorities include weakening the SEC's CEO pay ratio disclosure requirement¹⁰ and repeal of the employer mandate requiring large companies to provide health coverage to full-time workers,¹¹ which may disproportionately affect BIPOC workers and stakeholders.

Given the demographics of Walmart's hourly workforce, shareholders want to ensure Walmart is not contributing to or exacerbating broader racial inequities. Failure to effectively address racial inequities in its operations exposes stakeholders, including employees, to unacceptable abuses and exposes Walmart to risks that may ultimately affect shareholder long-term value.

A racial equity audit would help Walmart identify, prioritize, remedy and avoid adverse impacts on nonwhite stakeholders and communities of color. We urge Walmart to assess its behavior through a racial equity lens in order to obtain a



complete picture of how it contributes to, and could help dismantle, social and economic inequality.

*BLACKROCK AND ALLIANCEBERNSTEIN USED NVPERS FUNDS TO SUPPORT A REPORT ON POLITICAL CONTRIBUTIONS AND EXPENDITURES AT **CAESARS ENTERTAINMENT***

Both BlackRock⁶ and AllianceBernstein⁷ voted NVPERS' shares in Caesars Entertainment in favor of a resolution for Caesars Entertainment to issue a report on political contributions and expenditures:

Issuer Name	Meeting Date	Proposal Number	Proposal Text	Proponent	Mgmt Rec	Vote Instruction
Caesars Entertainment, Inc.	06/13/2023	5	Report on Political Contributions and Expenditures	SH	Against	For

Issuer Name	Meeting Date	Shares Voted	Proposal Number	Proposal Text	Proponent	Mgmt Rec	Vote Instruction
Caesars Entertainment, Inc.	06/13/2023	71,759	5	Report on Political Contributions and Expenditures	SH	Against	For

While a report on political contributions and expenditures might sound benign enough on the surface, as the American Accountability Foundation revealed in a [report](#) last summer, these reports on political and lobbying expenditures are used for the purpose of bullying companies into ceasing contributions to conservative candidates and organizations, as well as to trade associations and other pro-business groups. As our report stated, the intent of these resolutions is “to force companies to **name** trade associations, think tanks, other nonprofits, political committees, and candidates they support, so the woke mob can later **shame** companies for supporting them.”

This resolution at Caesars is no exception. The resolution, introduced by the Comptroller of the State of New York, calls for Caesars to issue a report on the political contributions it makes – including to trade associations and tax-exempt groups – for the purpose of assessing “whether [Caesars] election-related spending aligns or conflicts with its policies on climate change and sustainability, or other areas of concern”:⁸

The Comptroller of the State of New York, as the trustee of the New York State Common Retirement Fund (the “Fund”) and the Administrative Head of the New York State and Local Retirement System, has informed us the Fund intends to solicit proxies at the Annual Meeting for the following proposal. The Fund has also advised

⁶ BlackRock [Jan 1 to June 30 2023](#) Proxy Votes Received from NVPERS Public Records Request, Line 1117

⁷ AllianceBernstein [12-30-22 to 6-30-23 Proxy Votes](#) Received from NVPERS Public Records Request, Line 6442

⁸ SEC EDGAR, Caesars Entertainment [2023 Proxy Statement](#)



us that collectively it beneficially owns 216,344 shares of our common stock, which constitute approximately 0.1% of our outstanding common stock as of April 17, 2023.

The text of the proposal is the sole responsibility of the Fund and is set forth in italics below.

The Board has evaluated the Fund's proposal and has a statement in response to such shareholder proposal as set forth below.

Resolved, that the shareholders of Caesars Entertainment, Inc. ("Caesars" or "Company") hereby request that the Company provide a report, updated semiannually, disclosing the Company's:

- a. Policies and procedures for making, with corporate funds or assets, contributions and expenditures (direct or indirect) to (a) participate or intervene in any campaign on behalf of (or in opposition to) any candidate for public office, or (b) influence the general public, or any segment thereof, with respect to an election or referendum.*
- b. Monetary and non-monetary contributions and expenditures (direct and indirect) used in the manner described in section 1 above, including:*
 - i. The identity of the recipient as well as the amount paid to each; and*
 - ii. The title(s) of the person(s) in the Company responsible for decision-making.*

The report shall be presented to the board of directors or relevant board committee and posted on the Company's website within 12 months from the date of the annual meeting. This proposal does not encompass lobbying spending.

Supporting Statement

As long-term shareholders of Caesars, we support transparency and accountability in corporate electoral spending. This includes any activity considered intervention in a political campaign under the Internal Revenue Code, such as direct and indirect contributions to political candidates, parties, or organizations, and independent expenditures or electioneering communications on behalf of federal, state, or local candidates.

*A company's reputation, value, and bottom line can be adversely impacted by political spending. The risk is especially serious when giving to **trade associations**, Super PACs, 527 committees, and **"social welfare" organizations** – groups that routinely pass money to or spend on behalf of candidates and political causes that a company might not otherwise wish to support.*

When the Conference Board released its 2021 "Under a Microscope" report it detailed these risks, and recommended the process suggested in this proposal. The organization also said, "a new era of stakeholder scrutiny, social media, and political polarization has propelled corporate political activity—and the risks that come with it—into the spotlight. Political activity can pose increasingly significant risks for



companies, including the perception that political contributions—and other forms of activity—are at odds with core company values.”

Publicly available records show Caesars has contributed at least \$8 million in corporate funds since the 2010 election cycle.

This proposal asks Caesars to disclose all of its electoral spending, including payments to trade associations and other tax-exempt organizations which may be used for electoral purposes—and are otherwise not public. This would bring our Company in line with a growing number of leading companies, including MGM Resorts International, Las Vegas Sands Corp., and Marriott International Inc., which present this information on their websites.

Without knowing the recipients of our company’s political dollars we cannot sufficiently assess whether our company’s election-related spending aligns or conflicts with its policies on climate change and sustainability, or other areas of concern. We urge your support for this critical governance reform.

MELLON CAPITAL USED NVPERS FUND TO SUPPORT ALIGNING TOTALENERGIES’ GREENHOUSE GAS EMISSIONS TARGETS WITH PARIS AGREEMENT

In May 2023, Mellon Capital voted NVPERS shares in the French supermajor oil company, TotalEnergies, in favor of an advisory shareholder resolution to “align targets for indirect scope 3 emissions with the Paris Climate Agreement”:⁹

Company Name	Meeting Date	Proposal Number	Proposal Text	Management Recommendation	Vote Instruction
TotalEnergies SE	26-May-23	A	Align Targets for Indirect Scope 3 Emissions with the Paris Climate Agreement (Advisory)	Against	For

The resolution calls for aligning TotalEnergies’ 2030 reduction targets for the end use of its products with the Paris Climate Agreement:¹⁰

Shareholder resolution

By an advisory vote, shareholders support the Company, through the action of its Board of Directors, to align its existing 2030 reduction targets covering the greenhouse gas (GHG) emissions of the use of its energy products (Scope 3) with the goal of the Paris Climate Agreement: to limit global warming to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C.

The strategy to achieve these targets is entirely up to the Board of Directors.

You have our support.

⁹ Mellon Capital [Jan 23 to June 23 Proxy Votes](#) Received from NVPERS Public Records Request (PW 355), Line 9877

¹⁰ TotalEnergies, [2023 Shareholder Resolution](#) on Alignment with Paris Agreement



FULL LIST OF 201 WOKE PROXY VOTES SINCE 2022

All told, we found 201 instances of NVPERS' asset managers voting in favor of woke resolutions. The full list of these resolutions is below.

Company Name	Date	Resolution	Manager	Line #/Page #
Abbott Laboratories	28-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1931
Abbott Laboratories	29-Apr-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1774
AbbVie Inc.	6-May-2022	Report on Congruency of Political Spending with Company Values and Priorities	AllianceBernstein	Line 2626
Aena S.M.E. SA	31-Mar-2022	Advisory Vote on Company's 2021 Updated Report on Climate Action Plan	Mellon Capital	Line 1837
Alphabet Inc.	2-Jun-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 6054
Alphabet Inc.	2-Jun-2023	Report on Framework to Assess Company Lobbying Alignment with Climate Goals	AllianceBernstein	Line 6056
Alphabet Inc.	2-Jun-2023	Report on Risks of Doing Business in Countries with Significant Human Rights Concerns	AllianceBernstein	Line 6058
Alphabet Inc.	2-Jun-2023	Publish Independent Human Rights Impact Assessment of Targeted Advertising Technology	AllianceBernstein	Line 6059
Alphabet Inc.	1-Jun-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5039
Alphabet Inc.	1-Jun-2022	Report on Climate Lobbying	AllianceBernstein	Line 5040
Alphabet Inc.	1-Jun-2022	Report on Physical Risks of Climate Change	AllianceBernstein	Line 5041
Alphabet Inc.	1-Jun-2022	Report on Metrics and Efforts to Reduce Water Related Risk	AllianceBernstein	Line 5042
Alphabet Inc.	1-Jun-2022	Oversee and Report a Third-Party Racial Equity Audit	AllianceBernstein	Line 5043
Alphabet Inc.	1-Jun-2022	Commission Third Party Assessment of Company's Management of Misinformation and Disinformation Across Platforms	AllianceBernstein	Line 5050
Alphabet Inc.	1-Jun-2022	Oversee and Report a Third-Party Racial Equity Audit	BlackRock	Line 273
Alphabet Inc.	1-Jun-2022	Commission Third Party Assessment of Company's Management of Misinformation and Disinformation Across Platforms	BlackRock	Line 280
Altria Group, Inc.	18-May-2023	Report on Congruency of Political Spending with Company Values and Priorities	AllianceBernstein	Line 4570
Altria Group, Inc.	18-May-2023	Report on Third-Party Civil Rights Audit	AllianceBernstein	Line 4571
Amazon.com, Inc.	24-May-2023	Report on Median and Adjusted Gender/Racial Pay Gaps	AllianceBernstein	Line 5227
Amazon.com, Inc.	25-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 4535
Amazon.com, Inc.	25-May-2022	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 4538
Amazon.com, Inc.	25-May-2022	Report on Efforts to Reduce Plastic Use	BlackRock	Line 320
Amazon.com, Inc.	25-May-2022	Report on Lobbying Payments and Policy	BlackRock	Line 326
American Airlines Group Inc.	8-Jun-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5324
American Water Works Company, Inc.	11-May-2022	Report on Third-Party Racial Equity Audit	AllianceBernstein	Line 2989
Amphenol Corporation	18-May-2023	Report on Political Contributions and Expenditures	AllianceBernstein	Line 4585
Anthem, Inc.	18-May-2022	Oversee and Report a Racial Equity Audit	BlackRock	Line 546
Apple Inc.	10-Mar-2023	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 432
Apple Inc.	4-Mar-2022	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 254
Apple Inc.	4-Mar-2022	Report on Civil Rights Audit	AllianceBernstein	Line 255
Berkshire Hathaway Inc.	6-May-2023	Report on Physical and Transitional Climate-Related Risks and Opportunities	AllianceBernstein	Line 3008
Berkshire Hathaway Inc.	6-May-2023	Report on Audit Committee's Oversight on Climate Risks and Disclosures	AllianceBernstein	Line 3009
Berkshire Hathaway Inc.	6-May-2023	Report If and How Company Will Measure, Disclose and Reduce GHG Emissions	AllianceBernstein	Line 3010



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Berkshire Hathaway Inc.	6-May-2023	Report on Effectiveness of Diversity, Equity, and Inclusion Efforts	AllianceBernstein	Line 3011
Berkshire Hathaway Inc.	6-May-2023	Report on Physical and Transitional Climate-Related Risks and Opportunities	BlackRock	Line 899
Berkshire Hathaway Inc.	6-May-2023	Report If and How Company Will Measure, Disclose and Reduce GHG Emissions	BlackRock	Line 901
Berkshire Hathaway Inc.	30-Apr-2022	Report on Climate-Related Risks and Opportunities	AllianceBernstein	Line 1904
Berkshire Hathaway Inc.	30-Apr-2022	Report on GHG Emissions Reduction Targets	AllianceBernstein	Line 1905
Berkshire Hathaway Inc.	30-Apr-2022	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 1906
Berkshire Hathaway Inc.	30-Apr-2022	Report on Climate-Related Risks and Opportunities	BlackRock	Line 856
Berkshire Hathaway Inc.	30-Apr-2022	Report on GHG Emissions Reduction Targets	BlackRock	Line 857
Berkshire Hathaway Inc.	30-Apr-2022	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	BlackRock	Line 858
Bio-Rad Laboratories, Inc.	25-Apr-2023	Report on Political Contributions and Expenditures	AllianceBernstein	Line 1136
Caesars Entertainment, Inc.	13-Jun-2023	Report on Political Contributions and Expenditures	AllianceBernstein	Line 6442
Caesars Entertainment, Inc.	13-Jun-2023	Report on Political Contributions and Expenditures	BlackRock	Line 1117
Caterpillar Inc.	14-Jun-2023	Report on Climate Lobbying	AllianceBernstein	Line 6495
Caterpillar Inc.	8-Jun-2022	Report on Long-Term Greenhouse Gas Targets Aligned with Paris Agreement	AllianceBernstein	Line 5337
Caterpillar Inc.	8-Jun-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5338
Caterpillar Inc.	8-Jun-2022	Report on Long-Term Greenhouse Gas Targets Aligned with Paris Agreement	BlackRock	Line 1130
Cenovus Energy Inc.	26-Apr-2023	Report on Lobbying and Policy Advocacy with its Net Zero Goal	Mellon Capital	Line 4318
Cenovus Energy Inc.	26-Apr-2023	Report on Lobbying and Policy Advocacy with its Net Zero Goal	SSgA	Page 215
CGI Inc.	1-Feb-2023	SP 4: Report on Racial Disparities and Equity Issues	SSgA	Page 4
Charter Communications, Inc.	25-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1154
Charter Communications, Inc.	25-Apr-2023	Report on Lobbying Payments and Policy	BlackRock	Line 1379
Charter Communications, Inc.	26-Apr-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1023
Charter Communications, Inc.	26-Apr-2022	Disclose Climate Action Plan and GHG Emissions Reduction Targets	AllianceBernstein	Line 1026
Charter Communications, Inc.	26-Apr-2022	Report on Effectiveness of Diversity, Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 1028
Charter Communications, Inc.	26-Apr-2022	Report on Effectiveness of Diversity, Equity and Inclusion Efforts and Metrics	BlackRock	Line 1289
Charter Communications, Inc.	26-Apr-2022	Report on Lobbying Payments and Policy	BlackRock	Line 1284
Chevron Corporation	25-May-2022	Issue Audited Net-Zero Scenario Analysis Report	AllianceBernstein	Line 4577
Chevron Corporation	25-May-2022	Oversee and Report on Reliability of Methane Emission Disclosures	AllianceBernstein	Line 4578
Chevron Corporation	25-May-2022	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 4580
Chevron Corporation	25-May-2022	Oversee and Report on Reliability of Methane Emission Disclosures	BlackRock	Line 1308
Chipotle Mexican Grill, Inc.	18-May-2022	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 3823
Chubb Limited	19-May-2022	Report on Efforts to Reduce GHG Emissions Associated with Underwriting, Insuring, and Investing	BlackRock	Line 1360
Chubu Electric Power Co., Inc.	28-Jun-2023	Amend Articles to Require Disclosure of Capital Allocation Policy Aligned with a Net Zero by 2050 Pathway	Mellon Capital	Line 12522
Cintas Corporation	25-Oct-2022	Report on Political Contributions	AllianceBernstein	Line 387
Comcast Corporation	7-Jun-2023	Oversee and Report on a Racial Equity Audit	AllianceBernstein	Line 6209



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Comcast Corporation	1-Jun-2022	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 5068
ConocoPhillips	10-May-2022	Report on GHG Emissions Reduction Targets	AllianceBernstein	Line 2825
Constellation Software	5-May-2022	SP: Report on Racial Diversity in the Workplace	SSgA	Page 209
Constellation Software Inc.	5-May-2022	SP: Report on Racial Diversity in the Workplace	Mellon Capital	Line 6630
Coterra Energy Inc.	4-May-2023	Report on Reliability of Methane Emission Disclosures	AllianceBernstein	Line 2663
Coterra Energy Inc.	4-May-2023	Report on Climate Lobbying	AllianceBernstein	Line 2664
Coterra Energy Inc.	4-May-2023	Report on Reliability of Methane Emission Disclosures	BlackRock	Line 1764
DaVita Inc.	9-Jun-2022	Report on Political Contributions and Expenditures	AllianceBernstein	Line 5489
Delta Air Lines, Inc.	16-Jun-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5717
DexCom, Inc.	18-May-2023	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 4649
DISH Network Corporation	29-Apr-2022	Report on Political Contributions	BlackRock	Line 1883
DISH Network Corporation	29-Apr-2022	Report on Political Contributions	AllianceBernstein	Line 1812
Dollar General Corporation	25-May-2022	Report on Political Contributions and Expenditures	AllianceBernstein	Line 4606
Dollar Tree, Inc.	30-Jun-2022	Report on GHG Emissions Reduction Targets Aligned with the Paris Agreement Goal	BlackRock	Line 1912
Dominion Energy, Inc.	11-May-2022	Report on the Risk of Natural Gas Stranded Assets	BlackRock	Line 1931
Dominion Energy, Inc.	11-May-2022	Report on the Risk of Natural Gas Stranded Assets	AllianceBernstein	Line 3040
DTE Energy Company	4-May-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 2681
Eli Lilly and Company	1-May-2023	Report on Effectiveness of Diversity, Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 2014
Eli Lilly and Company	2-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1929
Expeditors International of Washington, Inc.	2-May-2023	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 2138
Expeditors International of Washington, Inc.	2-May-2023	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	BlackRock	Line 2514
Exxon Mobil Corporation	31-May-2023	Report on Methane Emission Disclosure Reliability	AllianceBernstein	Line 5854
Exxon Mobil Corporation	25-May-2022	Report on Scenario Analysis Consistent with International Energy Agency's Net Zero by 2050	BlackRock	Line 2356
FedEx Corporation	19-Sep-2022	Report on Alignment Between Company Values and Electioneering Contributions	AllianceBernstein	Line 254
FedEx Corporation	19-Sep-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 255
FedEx Corporation	19-Sep-2022	Report on Climate Lobbying	AllianceBernstein	Line 257
Ferrovial SA	5-Apr-2022	Advisory Vote on Company's Greenhouse Gas Emissions Reduction Plan	Mellon Capital	Line 2193
General Dynamics Corporation	4-May-2022	Report on Human Rights Due Diligence	AllianceBernstein	Line 2176
General Mills, Inc.	27-Sep-2022	Report on Absolute Plastic Packaging Use Reduction	AllianceBernstein	Line 308
Glencore Plc	26-May-2023	Resolution in Respect of the Next Climate Action Transition Plan	Mellon Capital	Line 9850
Glencore Plc	26-May-2023	Report in Respect of the Next Climate Action Transition Plan	SSgA	Page 501
HCA Healthcare, Inc.	21-Apr-2022	Report on Political Contributions	AllianceBernstein	Line 780
HCA Healthcare, Inc.	21-Apr-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 781
Hennes & Mauritz AB	4-May-2022	Report on Sustainably Sourced and Organically Produced Cotton	SSgA	Page 198
Honeywell International Inc.	25-Apr-2022	Report on Climate Lobbying	AllianceBernstein	Line 924
Honeywell International Inc.	25-Apr-2022	Report on Environmental and Social Due Diligence	AllianceBernstein	Line 925
Huntington Ingalls Industries, Inc.	2-May-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 2153
International Business Machines Corporation	25-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1243
Intuitive Surgical, Inc.	27-Apr-2023	Report on Gender/Racial Pay Gap	AllianceBernstein	Line 1780



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Johnson & Johnson	28-Apr-2022	Oversee and Report a Racial Equity Audit	BlackRock	Line 3299
JPMorgan Chase & Co.	16-May-2023	Report on Political Expenditures Congruence	AllianceBernstein	Line 4025
Kellogg Company	28-Apr-2023	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 1965
L3Harris Technologies, Inc.	21-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1039
Leidos Holdings, Inc.	28-Apr-2023	Report on Political Expenditures Congruence	AllianceBernstein	Line 1982
Lowe's Companies, Inc.	27-May-2022	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 4985
Lowe's Companies, Inc.	27-May-2022	Report on Median Gender/Racial Pay Gap	BlackRock	Line 3606
Marriott International, Inc.	12-May-2023	Report on Gender/Racial Pay Gap	AllianceBernstein	Line 3843
Meta Platforms, Inc.	31-May-2023	Report on Human Rights Impact Assessment of Targeted Advertising	AllianceBernstein	Line 5877
Meta Platforms, Inc.	31-May-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5878
Meta Platforms, Inc.	31-May-2023	Report on Allegations of Political Entanglement and Content Management Biases in India	AllianceBernstein	Line 5879
Meta Platforms, Inc.	31-May-2023	Report on Framework to Assess Company Lobbying Alignment with Climate Goals	AllianceBernstein	Line 5880
Meta Platforms, Inc.	31-May-2023	Report on Human Rights Impact Assessment of Targeted Advertising	BlackRock	Line 4152
Meta Platforms, Inc.	25-May-2022	Publish Third Party Human Rights Impact Assessment	AllianceBernstein	Line 4705
Meta Platforms, Inc.	25-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 4708
Meta Platforms, Inc.	25-May-2022	Publish Third Party Human Rights Impact Assessment	BlackRock	Line 3870
Mitsubishi Corp.	23-Jun-2023	Amend Articles to Disclose Greenhouse Gas Emission Reduction Targets Aligned with Goals of Paris Agreement	Mellon Capital	Line 11678
Mitsubishi Corp.	23-Jun-2023	Amend Articles to Disclose Evaluation concerning Consistency between Capital Expenditures and Net Zero Greenhouse Gas Emissions by 2050 Commitment	Mellon Capital	Line 11679
Mitsubishi Corp.	23-Jun-2023	Amend Articles to Disclose Evaluation concerning Consistency between Capital Expenditures and Net Zero Greenhouse Gas Emissions by 2050 Commitment	SSgA	Page 598
Mitsubishi Corp.	24-Jun-2022	Amend Articles to Disclose Evaluation concerning Consistency between Capital Expenditures and Net Zero Greenhouse Gas Emissions by 2050 Commitment	Mellon Capital	Line 12018
Mitsubishi Corp.	24-Jun-2022	Amend Articles to Disclose Greenhouse Gas Emission Reduction Targets Aligned with Goals of Paris Agreement	SSgA	Page 485
Mohawk Industries, Inc.	25-May-2023	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 5691
Monster Beverage Corporation	14-Jun-2022	Report on GHG Emissions Reduction Targets Aligned with the Paris Agreement Goal	AllianceBernstein	Line 5627
Monster Beverage Corporation	14-Jun-2022	Report on GHG Emissions Reduction Targets Aligned with the Paris Agreement Goal	BlackRock	Line 4008
Netflix, Inc.	2-Jun-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 5155
Netflix, Inc.	2-Jun-2022	Report on Lobbying Payments and Policy	BlackRock	Line 4091
NextEra Energy, Inc.	19-May-2022	Report on Effectiveness of Diversity, Equity and Inclusion Efforts and Metrics	BlackRock	Line 4139
NextEra Energy, Inc.	19-May-2022	Report on Effectiveness of Diversity, Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 4295
PACCAR Inc	25-Apr-2023	Report on Climate Lobbying	AllianceBernstein	Line 1307
PACCAR Inc	25-Apr-2023	Report on Climate Lobbying	BlackRock	Line 4734
Phillips 66	11-May-2022	Report on Reducing Plastic Pollution	BlackRock	Line 4543
Republic Services, Inc.	16-May-2022	Report on Third-Party Environmental Justice Audit	BlackRock	Line 4860
Republic Services, Inc.	16-May-2022	Report on Third-Party Civil Rights Audit	BlackRock	Line 4861
Republic Services, Inc.	16-May-2022	Report on Third-Party Civil Rights Audit	AllianceBernstein	Line 3548
Restaurant Brands International Inc.	23-May-2023	Report on Lobbying Payments and Policy	SSgA	Page 471
Restaurant Brands International Inc.	23-May-2023	Report of Efforts to Reduce Plastic Use	SSgA	Page 471



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Rockwood International A/S	6-Apr-2022	Disclose Report on Political Contributions	SSgA	Page 12
Salesforce, Inc.	9-Jun-2022	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 5546
Salesforce, Inc.	9-Jun-2022	Oversee and Report a Racial Equity Audit	BlackRock	Line 4965
SVB Financial Group	21-Apr-2022	Report on Third-Party Racial Justice Audit	AllianceBernstein	Line 841
Sysco Corporation	18-Nov-2022	Report on Third-Party Civil Rights Audit	AllianceBernstein	Line 636
Sysco Corporation	18-Nov-2022	Report on Efforts to Reduce Plastic Use	AllianceBernstein	Line 638
Sysco Corporation	18-Nov-2022	Report on Efforts to Reduce Plastic Use	BlackRock	Line 620
Targa Resources Corp.	23-May-2023	Report on Efforts to Reduce Methane Emission Venting and Flaring in Supply Chain	BlackRock	Line 5599
Tesla, Inc.	4-Aug-2022	Report on Corporate Climate Lobbying in line with Paris Agreement	AllianceBernstein	Line 115
Tesla, Inc.	4-Aug-2022	Report on Corporate Climate Lobbying in line with Paris Agreement	BlackRock	Line 658
The Boeing Company	18-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 753
The Boeing Company	18-Apr-2023	Report on Climate Lobbying	AllianceBernstein	Line 754
The Boeing Company	18-Apr-2023	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 755
The Boeing Company	29-Apr-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1870
The Boeing Company	29-Apr-2022	Report on Net Zero Indicator	AllianceBernstein	Line 1873
The Boeing Company	29-Apr-2022	Report on Net Zero Indicator	BlackRock	Line 5397
The Cigna Group	26-Apr-2023	Report on Congruency of Political Spending with Company Values and Priorities	AllianceBernstein	Line 1566
The Coca-Cola Company	25-Apr-2023	Report on Congruency of Political Spending with Company Values and Priorities	AllianceBernstein	Line 1349
The Goldman Sachs Group, Inc.	26-Apr-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 1583
The Goldman Sachs Group, Inc.	26-Apr-2023	Report on Median Gender/Racial Pay Gap	AllianceBernstein	Line 1590
The Home Depot, Inc.	19-May-2022	Report on Congruency of Political Spending with Company Values and Priorities	AllianceBernstein	Line 4344
The Home Depot, Inc.	19-May-2022	Report on Efforts to Eliminate Deforestation in Supply Chain	AllianceBernstein	Line 4346
The Home Depot, Inc.	19-May-2022	Oversee and Report a Racial Equity Audit	AllianceBernstein	Line 4347
The Home Depot, Inc.	19-May-2022	Report on Efforts to Eliminate Deforestation in Supply Chain	BlackRock	Line 5513
The Home Depot, Inc.	19-May-2022	Oversee and Report a Racial Equity Audit	BlackRock	Line 5514
The Kansai Electric Power Co., Inc.	28-Jun-2023	Amend Articles to Disclose Transition Plan through 2050 Aligned with Goals of Paris Agreement	Mellon Capital	Line 12781
The Kansai Electric Power Co., Inc.	28-Jun-2022	Amend Articles to Disclose Transition Plan through 2050 Aligned with Goals of Paris Agreement	Mellon Capital	Line 12792
The Kroger Co.	22-Jun-2023	Report on Gender/Racial Pay Gap	AllianceBernstein	Line 6818
The Kroger Co.	22-Jun-2023	Report on Gender/Racial Pay Gap	BlackRock	Line 5982
The Kroger Co.	23-Jun-2022	Report on Efforts to Eliminate HFCs in Refrigeration and Reduce GHG Emissions	AllianceBernstein	Line 5898
The TJX Companies, Inc.	6-Jun-2023	Report on Third-Party Assessment of Human Rights Due Diligence in Supply Chain	AllianceBernstein	Line 6190
The TJX Companies, Inc.	7-Jun-2022	Report on Assessing Due Diligence on Human Rights in Supply Chain	AllianceBernstein	Line 5301
The Travelers Companies, Inc.	24-May-2023	Oversee and Report on a Third-Party Racial Equity Audit	AllianceBernstein	Line 5496
The Travelers Companies, Inc.	25-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 4769
The Travelers Companies, Inc.	25-May-2022	Report on Efforts to Measure, Disclose and Reduce GHG Emissions Associated with Underwriting	BlackRock	Line 5678
The Walt Disney Company	9-Mar-2022	Report on Gender/Racial Pay Gap	AllianceBernstein	Line 353
The Walt Disney Company	9-Mar-2022	Report on Gender/Racial Pay Gap	BlackRock	Line 5699
Tokyo Electric Power Co. Holdings, Inc.	28-Jun-2023	Amend Articles to Require Disclosure of Asset Resilience to a Net Zero by 2050 Pathway	Mellon Capital	Line 12795



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Tokyo Electric Power Co. Holdings, Inc.	28-Jun-2022	Amend Articles to Require Disclosure of Asset Resilience to a Net Zero by 2050 Pathway	Mellon Capital	Line 12814
TotalEnergies SE	26-May-2023	Align Targets for Indirect Scope 3 Emissions with the Paris Climate Agreement (Advisory)	Mellon Capital	Line 9877
Toyota Motor Corp.	14-Jun-2023	Amend Articles to Report on Corporate Climate Lobbying Aligned with Paris Agreement	Mellon Capital	Line 10569
Twitter, Inc.	25-May-2022	Report on Political Contributions	AllianceBernstein	Line 4795
Twitter, Inc.	25-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 4796
Tyson Foods, Inc.	10-Feb-2022	Report on Sustainable Packaging Efforts	BlackRock	Line 5857
Tyson Foods, Inc.	10-Feb-2022	Report on Sustainable Packaging Efforts	AllianceBernstein	Line 195
United Parcel Service, Inc.	4-May-2023	Report on Effectiveness of Diversity, Equity, and Inclusion Efforts	AllianceBernstein	Line 2837
United Parcel Service, Inc.	5-May-2022	Report on Lobbying Payments and Policy	AllianceBernstein	Line 2578
United Parcel Service, Inc.	5-May-2022	Report on Corporate Climate Lobbying Aligned with Paris Agreement	AllianceBernstein	Line 2579
United Parcel Service, Inc.	5-May-2022	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	AllianceBernstein	Line 2583
United Parcel Service, Inc.	5-May-2022	Report on Effectiveness of Diversity Equity and Inclusion Efforts and Metrics	BlackRock	Lin 5926
Walmart Inc.	31-May-2023	Commission Third Party Racial Equity Audit	AllianceBernstein	Line 5903
Walmart Inc.	1-Jun-2022	Report on Animal Welfare Policies and Practices in Food Supply Chain	AllianceBernstein	Line 5107
Walmart Inc.	1-Jun-2022	Report on Lobbying Payments and Policy	BlackRock	Line 6140
Waste Management, Inc.	10-May-2022	Report on Civil Rights Audit	AllianceBernstein	Line 2963
Waste Management, Inc.	10-May-2022	Report on Civil Rights Audit	BlackRock	Line 6153
Wells Fargo & Company	25-Apr-2023	Report on Political Expenditures Congruence	AllianceBernstein	Line 1412
Wells Fargo & Company	25-Apr-2023	Report on Climate Lobbying	AllianceBernstein	Line 1413
Yum! Brands, Inc.	18-May-2023	Report on Lobbying Payments and Policy	AllianceBernstein	Line 4883

Note: Mellon Capital files can be opened by using the password "355."

