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Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights

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Prudence and Loyalty in Selecting Plan Investments and Exercising Shareholder Rights

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General Comment

ERISA plans help create financial security for workers across the country. Until 2020, when the last Administration, acting more politically than with a careful examination of what the rule change they made would do, limited what could be considered in investment risk by specifically taking out climate change and corporate governance issues out of the list of potential risks that retirement plans could consider when providing investment choices for workers. This goes against trends in investing by financial advisors and investment companies everywhere. With the proposed rule you are returning ERISA to a less political stance by allowing these plans to have the freedom to consider these important factors in investment risk to continue to be considered as they were, appropriately.

You only have to look at the increased intensity and frequency of climate disasters to see how much they are part of our lives now and will be going forward into the future. That workers would not be allowed to have these trends considered in the choices that they are provided to invest in will put their investments and their financial security at risk. Whether a corporation has leadership choosing to act on these trends, even keeping shareholders from demanding that they do so, should be a sign that a corporation is likely to have performance problems, so corporate governance on this issue alone should also be considered. But increasingly, when corporations look away from establishing policies related to abuse of their workers, pay equity, and how transparent they are about the behavior of their managers, that company is only a major lawsuit away from huge losses, and these issue, too, should be allowed to be taken into consideration in ERISA regulated investment plans.

I strongly support the Proposed Rule change.

Thank You