Resource guide for plan sponsors:
Adding a socially responsible investment option to your DC plan

June 2007
Adding a socially responsible investing option to your DC plan: Six steps

This step-by-step guide assists plan sponsors considering the addition of a socially responsible investment (SRI) option to their defined contribution (DC) retirement plan. The Social Investment Forum (SIF) engaged Mercer Investment Consulting, Inc. (Mercer IC) to prepare this guide in response to results from a recent survey that shows that although plan sponsor interest in SRI is increasing, many plan participants still do not have access to or sufficient knowledge of SRI options. The survey indicates that many plans (41 percent) are considering adding an option within the next three years in addition to the 19% already offering an SRI option.

The steps outlined will help sponsors demonstrate the feasibility of SRI as an investment option and address their situation-specific concerns about SRI. The described framework assists in the review, consideration and addition of an SRI option.

Step #1: Gauge interest in adding an SRI option

With recent media coverage of corporate governance, climate change and other issues, public interest in SRI is on the rise. As a result, sponsors may increasingly field requests to add an SRI option to their DC plans. In fact, recommendations from board members, and pension, investment and management staff, as well as requests from participants are leading drivers for adding an SRI option. However, the most significant driver cited by sponsor survey respondents for adding this option is to demonstrate an alignment with the mission or values of the sponsor. The inclusion of an SRI option is often viewed as an element of a company’s commitment to corporate responsibility. For this reason, boards and investment and pension committees receive requests from their own executives, such as managers of corporate social responsibility (CSR), to consider adding an SRI option to the organization’s retirement plan.

Steps to adding an SRI option to your DC plan

- Step #1: Gauge interest in adding an SRI option
- Step #2: Increase your knowledge of SRI
- Step #3: Check with your consultant and/or plan administrator
- Step #4: Make the case: Addressing performance and fiduciary concerns
- Step #5: Choose a fund (and monitor performance)
- Step #6: Educate participants

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1 Defined Contribution Plans and Socially Responsible Investing in the United States. June 2007. The SIF commissioned Mercer Investment Consulting, Inc. to complete a survey of plan sponsors and administrators on SRI options in DC plans. SIF’s project partners made this survey possible by providing input and funding to SIF: Altrushare Securities, Calvert, FTSE Group, Neuberger Berman, Northern Trust, and TIAA-CREF. This survey report is available at www.socialinvest.org, www.mercerIC.com/sri, or any of the project partners’ websites.

Surveying participants

Some sponsors have found that surveying plan participants is an excellent way to gauge demand for an SRI fund and to uncover specific social issues of concern (for example, the environment, corporate governance or diversity). Surveys need not focus solely on interest in SRI but can also be broad enough to determine interest in adding other investment options to plans and satisfaction with the current line-up. It would be helpful to include explanatory information about SRI at the beginning of such a survey to ensure a level of understanding. A number of sample survey questions follow:

1. Would you like your retirement fund options to include an SRI option (one that uses social and environmental criteria to help choose its holdings)?

2. How familiar are you with SRI?

3. Please rate the following in terms of importance in your retirement plan options:
   - A. Good financial returns
   - B. Investing with your values
   - C. Low risk
   - D. High risk
   - E. Risk that adjusts downwards as I get closer to retirement
   - F. Low fees

4. SRI funds utilize a variety of approaches, sometimes in combination. Which aspect of SRI is most important to you to achieve financial and social objectives?
   - A. Screening and analysis. Applying environmental, social and corporate governance (ESG) criteria to portfolio constituents
   - B. Shareholder advocacy. This may include proxy voting, dialogue with portfolio companies and/or filing of resolutions
   - C. Community investing. Capital is directed toward individuals, businesses and organizations in underserved communities

5. What specific social issues are you most concerned about?
   - A. Environment/climate change
   - B. Corporate governance
   - C. Diversity
   - D. Employee safety
   - E. Other

6. What type of SRI investment would you prefer as an option in your plan?
   - A. Multiple funds
   - B. Core investment fund
   - C. Asset allocation fund
   - D. Other

7. If you had an SRI option available, would you use it? If yes, approximately what percentage of your assets would you place in such a fund?
   - A. Less than 5 percent
   - B. Between 5 and 10 percent
   - C. Between 10 and 20 percent
   - D. Greater than 20 percent

8. Do you believe your company is committed to social responsibility?

9. Do you believe adding an SRI option would help demonstrate your company’s commitment to corporate responsibility?
Connecting with CSR managers
Many companies have dedicated staff managing CSR or sustainability issues. Often they are already networked with SRI research and investment firms and can relay their experience with various SRI investment strategies available. You should identify early on if such a position exists in your company. As you’ll read later, Intel’s Director of Corporate Responsibility Dave Stangis provided this type of support in the company’s decision to add SRI options to its DC plan.

Step #2:
Increase your knowledge of SRI
Once you assess a high level of participant interest and wish to proceed, it’s time to turn your attention to learning more about SRI and the various investment options available. The SIF (www.socialinvest.org) is the membership association for SRI practitioners; it offers comprehensive information, contacts and resources on SRI.

There is also a growing number of media outlets covering or dedicated to issues related to CSR and SRI. The following links provide easy access to information on a range of SRI issues including SRI fund performance, shareholder activities and the implications of environmental, social and governance (ESG) issues for investors:

- www.greenmoneyjournal.com: A newsletter that provides resources and contacts for SRI
- www.socialfunds.com: Website featuring information on SRI mutual funds, community investments, corporate research, shareowner actions and daily social investment news
- www.sristudies.org: Resources for investment professionals, academics and other people interested in the quantitative aspects of SRI

Investor initiatives
In addition to SRI-specific sources, there are a number of initiatives for investors that focus on deriving long-term enhanced returns from the analysis of ESG factors. The signatories to these initiatives are primarily investment managers, public pension funds and mission-based organizations seeking to align investments and ownership activities with their fiduciary mandate to minimize risk and provide long-term returns. The secretariats of these initiatives often serve as clearinghouses for information on SRI issues such as climate change.

The United Nations’ Principles for Responsible Investment (PRI) (www.unpri.org) offer a framework enabling investors to address ESG considerations within their investment strategies. The six principles, each associated with several possible actions, were developed by an international group of institutional investors reflecting the increasing relevance of ESG issues to investment practices and fiduciary duty. Since April 2006, over 50 asset owners and 50 asset managers from around the world representing assets of over US$8 trillion have committed to the PRI.4

United States funds that are signatories include Connecticut Retirement Plans and Trust Funds (CRPTF), CalPERS, Illinois State Board of Investment, New York City Employees Retirement System (NYCERS), New York State and Local Retirement System, The General Board of Pensions and Health Benefits of the United Methodist Church, and the Nathan Cummings Foundation.

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4 Mercer Investment Consulting was the original consultant to the PRI and continues to support the UN as a signatory and the consultant in developing the PRI reporting and assessment framework.
Sponsors can also delve into issues of ESG risk management through the following collaborative engagement initiatives:

- **Carbon Disclosure Project (CDP) (www.cdproject.net):** The CDP is the largest registry of corporate greenhouse gas emissions in the world. This initiative combines the efforts of many institutional investors by collectively signing a single global request for disclosure of information on greenhouse gas emissions.

- **Investor Network on Climate Risk (INCR) (www.incr.com):** This network of institutional investors and financial institutions is dedicated to promoting better understanding of the financial risks and investment opportunities associated with climate change.

- **Investor Environmental Health Network (www.iehn.org):** Inspired by INCR and CDP, this network of institutional investors and financial institutions encourages companies to address the environmental health questions raised by their products.

There are also industry groups that work with investors in different arenas to improve corporate governance, investor rights and the integration of ESG risks into financial analysis:

- **Council of Institutional Investors (www.cii.org):** A not-for-profit association of 130 pension funds with assets exceeding US$3 trillion, the CII works to educate members and the public about corporate governance and advocates strong governance standards on issues ranging from executive compensation to the election of corporate directors.

- **Enhanced Analytics Initiative (www.enhancedanalytics.com):** This international collaboration between asset owners and asset managers is aimed at encouraging better investment research that takes into account the impact of extra-financial issues on long-term investment.

- **United Nations Environment Program Finance Initiative, Asset Management Working Group (www.unepfi.org/work_streams/investment/amwg):** This global platform of asset managers representing US$2 trillion is focused on understanding the various ways ESG issues affect investment value and the evolving techniques for the inclusion of such extra-financial criteria and metrics.

**Step #3:**
**Check with your consultant and/or plan administrator**
It is prudent early on to research your existing plan administrator platform and external advisers. They may well already have information about SRI and investment options.

**Plan administrator platforms**
Many major plan administrator platforms provide access to at least one SRI option or have an open structure – that is, they are able to include any fund option on their platform. You may be surprised to learn that it already offers an SRI option. If so, find out which fund(s) is available, and inquire as to how the fund(s) was chosen. If your plan administrator does not currently provide an SRI option, see if it is able to add one for your account.

Be sure to also inquire if there are significant fees and/or administrative issues associated with adding a new fund to your investment line-up. If that's the case, external advisers may be able to assist with negotiating lower fees.
External advisers
More consultants are developing expertise in SRI and offer opinions or information on SRI strategies. If you are currently working with a consulting firm, you might ask them the following questions:

1. What is your level of knowledge and experience with SRI?
2. What is your view of SRI as part of a DC line-up?
3. Have you conducted successful SRI searches for DC plans?
4. Do you have off-the-shelf research on SRI managers and strategies?
5. Do you have dedicated SRI staff?
6. How do you evaluate an SRI fund?
7. What is the universe of SRI funds that you consider for a DC plan?

Step #4:
Make the case: Addressing performance and fiduciary concerns

There has been a perception that SRI investing means giving up returns, either because you are limiting the investment universe or because the correlation between ESG factors and financial performance has not been adequately demonstrated. Numerous academic studies have challenged this assertion and shown that there need not be a performance cost to SRI on a risk-adjusted basis.5

In fact, certain factors, such as environmental management and workplace health and safety, show positive correlations to valuation and financial performance metrics. Reputational risk associated with environmental and social issues has also been found to play a significant role in long-term financial performance.6 Issues such as climate change, corporate governance and community relations are seen to have material impacts on some companies and sectors. Increasingly, financial analysts are incorporating a company’s management of these issues into their analysis.7

But other studies show that there can be a performance cost to SRI.8 For more information about SRI performance research, the Haas School of Business at Berkeley and Lloyd Kurtz of Nelson Capital Management have developed an annotated bibliography of studies (www.sristudies.org).

Fiduciary duty

There has been a long-running debate on whether or not pursuing SRI is consistent with fiduciary duty. Recent survey results underscore fiduciary responsibility as a major concern of plan sponsors.9 Over the past several years, private and public sector experts have supported SRI funds and the consideration of ESG factors within investment management practices. These experts were supportive of SRI, provided that the investor expected competitive returns and completed and documented its due diligence process.

For example, in A Legal Framework for the Integration of Environmental, Social and Governance Issues into Institutional Investment, a major law firm examined fiduciary law in seven developed markets including the US and found that “The links between ESG factors and financial performance are increasingly being recognized. On that basis, integrating ESG considerations into an investment analysis is clearly permissible and is arguably required in all jurisdictions.”10

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6 Orlitzky, Marc, Schmidt, Frank L., and Sara L. Rynes. “Corporate Social and Financial Performance: A Meta-analysis. 2003.” This is a meta-analysis of 52 previous studies and 33,878 observations that demonstrates a positive correlation between corporate social and financial performance.
8 For example, Lehman Brothers, UBS and Goldman Sachs have all published recent reports on the risks and opportunities associated with climate change.
Other sources have dealt more explicitly with the negative screening of certain sectors that is often a part of SRI funds. In a paper for the California County Retirement System, the law firm of Baker & McKenzie issued the following statement: “If the social investment’s rate of return is similar to the return on a similar type of investment sought, then it appears that public system retirement boards can make the social investment.”

Regulators have also weighed in on the implications of the Employment Retirement Income Security Act (ERISA) regarding SRI. In 1998, Calvert sought an opinion on the application of ERISA to an SRI option as part of a retirement plan. The response from the Office of Regulations and Interpretations reads, in part:

“. . . The fiduciary standards of sections 403 and 404 do not preclude consideration of collateral benefits, such as those offered by a ‘socially responsible’ fund in a fiduciary’s evaluation of a particular investment opportunity . . . The same standards set forth in sections 403 and 404 of ERISA governing a fiduciary’s investment decision, discussed above, apply to a fiduciary’s selection of a ‘socially responsible’ mutual fund as a plan investment or, in the case of an ERISA section 404(c) plan, a designated investment alternative under the plan. Accordingly, if the above requirements are met, the selection of a ‘socially responsible’ mutual fund as either a plan investment or a designated investment alternative for an ERISA 404(c) plan, would not, in itself, be inconsistent with the fiduciary standards set forth in sections 403(c) and 404(a)(1) of ERISA.”

The citations above agree on two main points relevant to adding an SRI option to your plan:

- SRI options are acceptable within ERISA plans.
- The same requirements for due diligence apply to SRI and non-SRI funds.

These comments do not apply to any particular fund or family of funds; they are interpretations of fiduciary standards by private and government experts. Actions around SRI, as with other decisions, should be taken with a comfort level appropriate for a fiduciary. Showing a clearly articulated plan and method for adding an SRI option with appropriate due diligence is key to supporting the plan’s fiduciary duty. Legal counsel, committees and external consultants/advisers can assist with procedural and reporting aspects of this process.

**Step #5:**

**Choose a fund (and monitor performance)**

SRI funds as a group exhibit similar characteristics to non-SRI funds. There is an ever-expanding range of asset classes, styles and vehicles. In addition, SRI funds, like other types of funds, have varied in performance and tracking error.

There are many options available to plans looking for SRI investment vehicles; domestic equity funds are the most popular. However, different types of funds (such as asset allocation, income, style-based and geographically focused) are also offered by SRI management firms and increasingly by larger financial institutions entering the SRI space. SRI fund vehicles have

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also expanded in recent years to include exchange-
traded funds and passively managed, commingled
and separate account vehicles. SRI hedge funds and
lifestyle funds are also emerging.

In terms of choosing the right type of fund, your com-
pany should explore the following questions with your
committee and/or consultant:

1. Will the SRI fund fill a gap for an asset class not
represented in your plan or will it be an additional
option within an existing asset class?
2. What is the appropriate asset class, style and vehi-
cle for an SRI option in your plan?
3. What performance benchmark is appropriate for
an SRI option in your plan line-up?

In addition to where the SRI option might fit within
your existing line-up, the specific SRI tools utilized by
the fund should be considered. Stringency on negative
screens for sectors such as tobacco, alcohol and
weapons differ by fund manager. The same is true for
screens on issues such as the environment, labor and
human rights. Some funds utilize positive or best-in-
class screening to seek out the leaders on an issue or
within an industry (and avoid screening out sectors
completely).

Specialized SRI funds are also an option. Investments
focusing on treatment of women, protecting the envi-
ronment and religious beliefs are available.

As you consider the types of screens, ownership activ-
ities and commitment to community investing most
appropriate for your plan, the following questions will
help lead you toward a decision and allow you to nar-
row the list of SRI fund candidates:

1. Do your plan participants have specific values or
beliefs that will affect your choice of an SRI fund?
2. Do your participants or trustees prefer a negative
screening or positive screening approach to SRI?
3. Do you or your participants have an interest in
community investment as part of the offered SRI
option?

SRI funds offer additional characteristics that may be
of interest to plan sponsors and participants, such as
how proxies are voted and whether portfolio companies
are challenged on ESG issues. Questions that will help
you to determine the importance of commitments to
active ownership (including proxy voting, shareholder
engagement and advocacy) include:

1. Is a proactive proxy voting policy an important part
of SRI for you or your participants?
2. Is shareholder advocacy an important part of SRI
for you or your participants?
3. Is shareholder dialogue an important part of SRI for
you or your participants?

Consultants are seeing more requests for proposals
(RFPs) issued by clients searching for SRI funds with
specific characteristics. RFPs that include the preferred
characteristics for the SRI fund help focus the search
on the most applicable funds and managers.
Monitoring SRI options
As with any investment decision, once you have selected a fund option, the next step is to set up a system for monitoring its performance. A monitoring program implemented internally or through a consultant should regularly assess that the SRI fund is meeting its objectives.

Questions to pose to your SRI fund manager or to your consultant to evaluate your SRI fund's performance include:

1. Is your fund meeting return expectations, net of fees, on an absolute basis?
2. Is your fund meeting return expectations, net of fees, in relation to its SRI benchmark or peers?
3. Is your fund meeting return expectations, net of fees, according to its non-SRI benchmark or peers?
4. Is your fund maintaining its stated investment style?

The plan should also monitor the other traditional data points typically reviewed for non-SRI funds, such as investment staff turnover, capitalization, etc.

Additionally, an SRI fund should also maintain its stated mandate regarding screening, active ownership and community investing. There may be several ways to assess whether the quality of a fund’s social investing approach has been maintained. Communications from the managers to shareholders and clients should announce any major changes to screens or other SRI activities. In addition, consultants, research providers or internal staff can review the holdings of the fund to determine if the portfolios continue to meet expectations in terms of the SRI mandate.

Communications regarding proxy votes, engagement and community investing are often provided by SRI funds utilizing those tools as part of their SRI strategy. These may be reviewed as part of the monitoring program to ensure that the fund’s social concerns are aligned with those of the plan and its participants.

Additional questions to pose to your SRI fund manager or your consultant to assist with evaluating your SRI fund’s performance could include:

1. Have there been changes in the screens applied to the fund (for example, changes in criteria, research providers or focus of the fund)?
2. Have proxy voting policies been maintained and executed as expected? Are policies reviewed periodically to address new issues?
3. Were any shareholder resolutions filed by the manager over the last year? Are there other efforts to effect change in corporate performance and behavior that the manager can share?
4. Does community investing remain a part of the SRI strategy? Are the investments appropriate for the overall fund and for your plan?
Step #6: Educate participants

This is a critical step. When an SRI option is added to your plan, plan participants should be alerted to it with appropriate educational materials. A 2006 TIAA-CREF report found that TIAA-CREF participants had wanted their social values reflected in their investments but had a need for more information about SRI strategies and accounts. Educational information may be provided as part of regular communications on plan options, or specific efforts can be made to educate participants on SRI, such as through presentations by SRI investment firms, consultants or industry experts.

Your plan administrator, SRI fund manager or consultant can provide specific materials about your SRI fund options. They should be able to provide information with additional context about the SRI options within your line-up, such as differences between SRI and non-SRI funds and differences among SRI strategies.

If the plan (or the sponsoring company) is involved in promoting ESG issues, communicating these activities may have numerous ancillary benefits. For instance, it may reinforce and enhance the brand of the employer among employees and participants. This may translate to improved attraction and retention of key staff. For example, a company that adheres to the guidelines of the Global Reporting Initiative for disclosing corporate social, environmental, economic and ethical information (www.globalreporting.org) or is a constituent in an SRI index may wish to share this information with participants. As a consequence, such positive impressions may actually boost participation in the SRI option itself.

Specific considerations for introducing SRI and your SRI option to participants include:

1. Does the information provided to participants enable them to compare an SRI with a non-SRI investment based on financial performance and fees?
2. Does the information provided to participants explain the specific ESG criteria utilized by the SRI fund manager?
3. Does the information provided to participants explain the active ownership and community investing aspects of the fund?
4. Are additional sources of information or education available to participants who want to learn more about the investment or SRI in general?

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One company’s experience with SRI: A conversation with Dave Stangis, Intel’s director of corporate responsibility

(March 9, 2007)
Participants of Intel’s DC plan have had an option to invest in an SRI equity or fixed income fund since 2000. Dave Stangis, Intel’s director of corporate responsibility, played an integral role in the decision-making process, and, in the following discussion, he explains some of the challenges, obstacles and opportunities SRI presented to Intel. Note that Intel’s inclusion of SRI options predates this guide and therefore the process is not completely aligned with the recommendations presented. However, Dave’s experience may assist you in your consideration of the potential role for SRI in your DC plan.

Question: Can you walk us through the process that led to Intel’s addition of two SRI options?

DS: As part of Intel’s program to continuously improve its corporate responsibility, the company began speaking with SRI researchers and fund managers on a regular basis several years ago. As director of corporate responsibility, I took part in many of these conversations and developed these relationships. Some SRI researchers and investors wanted to know if Intel’s 401(k) plan experienced the same drive toward corporate responsibility as the company. To participate more fully in these conversations, I began experimenting with SRI in my personal investments. At the same time, I heard of other major corporations adding SRI options to their plans.

As Intel was striving to improve its corporate responsibility and environmental management, the idea of an SRI option for the DC plan was introduced to the pension committee. It took a few years to get onto the agenda of the regular investment committee meetings. Eventually, Intel approved the addition of two SRI funds (one equity, one fixed income) at the same time that it changed plan administrators and increased the number of investment options from 14 to 70.

Question: How were the funds chosen? Were they already a part of the platform or was a search conducted?

DS: After the plan administrator was chosen, the funds were selected by the Investment Policy Committee.

Intel’s Investment Policy Committee was focused on core holding – type funds for the equity and fixed income options. The new plan administrator already offered two SRI funds that met the committee’s criteria, so these were the funds chosen.

Question: What kind of communication was provided to participants about the SRI options? Were there any SRI-specific materials?

DS: The SRI options were announced as part of the rollout of additional options in the plan. No additional communication was issued by Intel.

Question: What has the reaction been?

DS: Coincidentally just after the two SRI funds were added, Intel began receiving inquiries from participants requesting SRI options. The requests mostly arrived through Intel’s Employee Sustainability Network, a virtual community of Intel employees interested in sustainability issues, but not necessarily working on them day to day. The Employee Sustainability Network was very interested in this investment option for the 401(k) plan and communicated this change across its membership. Intel was and continues to be pleased to be able to tell its employees that fixed income and equity investment SRI options are already available that consider environmental, social and governance issues.
Compilation of resources

For your reference, we have compiled in this section the website links mentioned in this guide, as well as other sites, some of which address the role of SRI and ESG in DC plan management.

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14 The Lens-Library is hosted by the Corporate Library, a leading resource of research and analysis on corporate governance issues (www.thecorporatelibrary.com).