

CEO name  
Company name  
Address line 1  
City  
Postal/zip code  
Country

26 May 2021

Dear CEO name,

As investor signatories to the Workforce Disclosure Initiative (WDI), we are writing to you to ask [company name] to take part in the 2021 WDI survey later this year. Our group of organisations represents \$7.5 trillion and we are seeking to better understand how companies are managing their key asset: their workforce.

As the world grapples with the ramifications of the COVID-19 pandemic, it has become increasingly clear that how corporations manage social issues and how they care for their workers is a key part of our fiduciary duty. When companies mismanage or overlook their responsibilities to their staff and supply chain, there are real world implications for people's lives and livelihoods, as well as the organisation's reputation, bottom line and future profitability.<sup>1</sup>

The WDI generates meaningful and comparable data about corporate workforce management for investors through an annual survey. Despite substantial efforts to date in company reporting, the information published in corporations' reports and online is not sufficient for us to fully understand how they are identifying and managing workforce risks, how they are attracting and retaining the best talent, and how they are ensuring their workers are safe and fairly remunerated; further there is now much research to prove that far from being a financial cost to the company, the workforce really is the key company asset and fundamental to its long-term success.<sup>2</sup>

We appreciate that you receive many requests for information; our aim is to help streamline this process by joining together in support of the WDI rather than each sending separate enquiries. Where applicable, the WDI survey aligns with other frameworks (the GRI, UNGP, CHRB etc) but its questions have a deeper and broader remit than those covered elsewhere to garner the level of information we as investors need. The WDI team can also pre-populate a response for you, with relevant information already in the public domain, to help you get started.

Last year, 141 companies from around the world took part, including the likes of BMO Global Asset Management, HSBC, The Toronto-Dominion Bank and Wells Fargo. To view the public findings report that resulted from the 2020 responses, please go to <https://shareaction.org/workforce-disclosure-initiative/why-disclose-to-the-wdi/workforce-disclosure-initiative-2020-findings/>.

The survey goes live on Monday 5 July and the submission deadline is Friday 29 October.  
**Please confirm, by email to [wdi@shareaction.org](mailto:wdi@shareaction.org), to whom we should send the survey.**

<sup>1</sup> [https://wp.law.harvard.edu/files/wp/files/final\\_human\\_capital\\_materiality\\_april\\_23\\_2015.pdf](https://wp.law.harvard.edu/files/wp/files/final_human_capital_materiality_april_23_2015.pdf)

<sup>2</sup> [https://corporatejustice.org/2018\\_good-business-report.pdf](https://corporatejustice.org/2018_good-business-report.pdf)

Thank you for your consideration of this important process, which is of substantial value to us as investors and, based on experience in previous years, also provides participating companies with considerable rewards through better workforce management and working conditions.

Yours sincerely,

The WDI investor signatory group

Please see below for the full list of 55 organisations

### *Purpose of the Workforce Disclosure Initiative*

The Workforce Disclosure Initiative survey requests information on workforce management in the company's direct operations and supply chain. It covers workforce composition, stability, training and development, and supply chain structure and relationships. The WDI provides clear guidance to companies on the type of information investors want to access in order to better understand investee companies' overall business models and strategies.

In completing the survey, we invite your team to be open about the challenges you may face in collecting and reporting the requested information. We positively encourage this transparency. As we improve our understanding of these barriers over time, the survey will be refined to ensure it continues to be a useful tool for companies and investors alike. Where applicable, the WDI survey aligns with other frameworks (the GRI, UNGP, CHRB etc) but its questions have a deeper and broader remit than those covered elsewhere to garner the level of information we as investors need.

*Guidance on completing the WDI survey ahead of the **Friday 29 October deadline**.*

**On 5 July, a link to the online reporting platform will be emailed to your company.** Please ensure your company is in touch with the WDI team to confirm with them who the most appropriate contact for our request is by emailing [wdi@shareaction.org](mailto:wdi@shareaction.org).

To assist those in the company who will complete the questionnaire, guidance and resources will be available on the WDI website. Webinars and online workshops will be provided to aid completion and provide further information on why increasing numbers of investors see workforce issues as important. And the WDI team will be available to help them through the process.

### *How the data submitted to investors via the Workforce Disclosure Initiative is used*

Following receipt of the completed surveys, the WDI team will evaluate companies based on level of completeness of their response and on the substance of their answers in comparison to peer groups. A **Disclosure Score** – only viewable to your company, us as WDI signatories and our partners – will be applied with reference to the amount of the survey completed by your company. Companies will also be acknowledged for their efforts in their 2021 response through the **Workforce Transparency Awards** that will be revealed in March 2022.

In the interests of transparency, we encourage you to make all sections of your response fully public, though this is not a requirement. Data not submitted publicly will be available only to investor signatories and those administering the survey on our behalf.

The WDI team will analyse all the data submitted in 2021. Their analysis will focus on identifying major trends identified in company responses. In addition, several best practice examples will be highlighted, in order to share learning from companies that are leading the way on workforce management.

## Signatories:

Caroline Le Meaux  
Head of ESG Research, Engagement, and Voting  
**Amundi**

Dina Ciarmatori  
ESG Research Analyst  
**Neuberger Berman**

Rogier Krens  
CIO  
**Achmea Investment Management**

Stephen Bird  
Chief Executive  
**Abrdn**

Kelly Christodoulou  
ESG Investment Manager  
**AustralianSuper**

Rachel Elwell  
Chief Executive Officer  
**Border to Coast Pensions Partnership**

Helen Price  
Stewardship Manager  
**Brunel Pension Partnership**

James Corah  
Head of Ethical and Responsible Investment  
**CCLA**

Dieter Waizenegger  
Executive Director  
**CtW Investment Group**

Corey Klemmer  
Director of Corporate Engagement  
**Domini Impact Investments**

Matthias Narr  
Head Engagement International  
**Ethos Engagement Pool International**

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Naim Abou Jaoude  
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**Candriam**

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Head of Risk and Compliance  
**Ardevora Asset Management**

Erica Cadbury  
Chair  
**Barrow Cadbury Trust**

Amy Augustine  
Director, ESG Investing  
**Boston Trust Walden Company**

Mark Elliott  
Partner and Head of Investment  
**Castlefield Investment Partners**

Adam Matthews  
Director of Ethics and Engagement  
**Church of England Pensions Board**

Duane Roberts  
Director of Equities  
**Dana Investment Advisors**

Neville White  
Head of Responsible Investment Policy & Research  
**EdenTree Investment Management**

Vincent Kaufmann  
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**Ethos Foundation**

Brenda Warrington  
Chair

## **Friends Provident Foundation**

Mary Delahunty  
Head of Impact

### **HESTA**

Lottie Meggitt

## **Independent Franchise Partners**

Ashish Ray  
Head of Governance & Sustainability

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Mark Fawcett  
CIO  
**Nest**

Gerald Cooney  
Chair

## **Northern LGPS**

Clare Reilly  
Chief Engagement Officer

## **PensionBee**

Jonathan Gillett  
Chair of Trustees

## **Polden-Puckham Charitable Foundation**

John David  
Investment Director,  
Head of Rathbone Greenbank Investments

## **Rathbone Greenbank**

Natasha Landell-Mills  
Head of Stewardship

## **Sarasin and Partners**

## **Greater Manchester Pension Fund**

Gema Esteban Garrido  
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## **Joseph Rowntree Charitable Trust**

Roland Rott  
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## **La Franaise Asset Management**

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Governance and Stewardship Manager

## **Liontrust Asset Management**

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Head of Responsible Investment  
**Local Pensions Partnership Investments (LPP)**

Mason Gregory  
Associate Director - Investment Solutions

## **MFS Investment Management**

Andrew Parry  
Head of Sustainable Investment and Member of the Executive Committee

## **Newton Investment Management**

Mari Schwartzer  
Director, Shareholder Activism & Engagement

## **NorthStar Asset Management**

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Deputy Executive Director, ESG

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Chief Executive of Investment Management  
**Universities Superannuation Scheme (USS)**

New company

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26 May 2021

Dear CEO name,

As investor signatories to the Workforce Disclosure Initiative (WDI), we are writing to you to ask [company name] to take part in the 2021 WDI survey. We requested your participation in 2020 but you did not submit a response.

The WDI is intended to generate meaningful and comparable data about corporate workforce management for investors through an annual survey. Despite substantial efforts to date in company reporting, our view is that the information published in corporations' reports and online is not sufficient for us to fully understand how they are identifying and managing workforce risks, how they are attracting and retaining the best talent, and how they are ensuring their workers are safe and fairly remunerated. In the current circumstances brought about by the Covid-19 pandemic, which we appreciate that companies like yours are navigating right now, it is more crucial than ever that companies are transparent about their workforce and their policies and practices.

In order to help us understand your approach to these issues more fully, we therefore request that you complete the WDI survey, when it goes live on 5 July.

We appreciate that you receive many requests for information; our aim is to help streamline this process by joining together in support of the WDI rather than each sending separate enquiries. The WDI investor signatory group now numbers more than 55 investors representing over \$7.5 trillion of assets.

Last year, 141 companies from around the world took part, including the likes of AstraZeneca, GlaxoSmithKline and Sanofi. To view the public findings report that resulted from the 2020 responses, please go to <https://shareaction.org/workforce-disclosure-initiative/why-disclose-to-the-wdi/workforce-disclosure-initiative-2020-findings/>.

**Please confirm, by email to [wdi@shareaction.org](mailto:wdi@shareaction.org), to whom we should send the survey.**

Thank you for your consideration of this important process, which is of substantial value to us as investors and, based on experience in previous years, also to you and your team. We look forward to your response and further dialogue to develop our understanding of your firm's approach to managing people.

Yours sincerely,

The WDI investor signatory group

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Non-responding company

CEO name  
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City  
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26 May 2021

Dear CEO name,

As investor signatories to the Workforce Disclosure Initiative (WDI), we would like to thank [company name] for your participation in the 2020 WDI. We acknowledge the leadership you have demonstrated by engaging with this process, and anticipate that many more companies will be following your lead by disclosing data via the WDI survey this year. In the current circumstances brought about by the Covid-19 pandemic, it is more crucial than ever that companies are transparent about their workforce and their policies and practices.

We hope that you found the Disclosure Scorecards useful and that they helped to guide internal conversations about where there are data gaps, and how you can change your policies and practices to ensure workers are well treated and that your organisation is identifying and adequately mitigating workforce risks.

As an ongoing data gathering exercise to inform our engagement and future assessments, especially in the light of the Covid-19 crisis, we request your completion of the WDI 2021 survey by the deadline of **29 October**.

Please direct any questions or comments to [wdi@shareaction.org](mailto:wdi@shareaction.org). Thank you in anticipation of your continued commitment to this important process, which is of substantial value to us as investors and, based on experience in previous years, also to you and your team. We look forward to your response and further dialogue to develop our understanding of your firm's approach to managing people.

Yours sincerely,

The WDI investor signatory group

Please see below for the full list of 55 organisations

## *Guidance on completing the WDI survey ahead of the 29 October deadline*

**On 5 July, a link to the online reporting tool will be emailed to your company but the survey is ready to view now on the WDI website.** The contact email addresses that we currently have on file for your company are:

belen.barcelo@servexternos.gruposantander.com,  
elena.minguez@servexternos.gruposantander.com fedgomez@gruposantander.com and  
mara.zabala@gruposantander.com. If there is a more suitable contact, please ensure your company is in touch with the WDI team within the next month so we can update our records: [wdi@shareaction.org](mailto:wdi@shareaction.org).

To assist those in your team who will complete the questionnaire, guidance and resources will be available on the WDI website. Webinars and online workshops will be provided to aid completion and provide further information on why investors increasingly see workforce issues as important. And of course the WDI team will be available to help you through the process.

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# ShareAction»



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Simon Pilcher  
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Responding company