

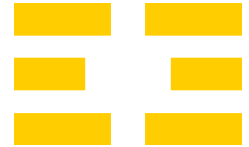


Polen Capital Management

Locations: United Kingdom (HQ)

Industries: Diversified Financials

RISK LEVEL:



Medium Risk

DESCRIPTION:

Polen Capital Management has not publicly terminated business relationships based on views or beliefs. The company is a signatory of the Principles for Responsible Investment, incorporating ESG issues into investment analysis, decision-making, and other business practices. Polen Capital integrates DEI into all of its business practices, prioritizing diversity in its hiring and funding the Toigo Foundation which promotes that practice. The company also supports the LGBTQ group Out In Finance. However, it does protect its employees against viewpoint discrimination and does not appear to discriminate against religious organizations in its charitable giving. For these reasons, Polen Capital receives a Medium Risk rating.

Corporate Weaponization

Has denied service to customers, suppliers, or vendors due to their political views or religious beliefs OR corporately boycotts, divests, or sanctions regions, people groups, or industries. Medium Risk

Polen Capital is a signatory of the Principles for Responsible Investment, incorporating ESG issues into investment analysis, decision-making, and other business practices (1)(2). The company integrates ESG into all of its business practices, “consider[ing] ESG issues and business issues as one and the same” (3). Polen Capital prioritizes diversity in its hiring (4). However, Polen Capital has not publicly fired customers, suppliers, or vendors based on political views or religious beliefs.

Charitable giving (including employee matching programs) policies or practices discriminate against charitable organizations based on views or religious beliefs. Lower Risk

Polen Capital does not appear to discriminate against religious organizations in its charitable giving. It “sponsors the Polen Capital Charitable Diversity Fund, a donor-advised fund granting charitable contributions to support diversity-focused organizations” (1).

Employment policies fail to protect against discrimination based on political affiliation/views and/or religion. Lower Risk

Polen Capital likely protects its employees against viewpoint discrimination. It “does not discriminate against individuals, employees or applicants in any way”, which should include no discrimination on the basis of viewpoint (1).

Corporate Governance and Public Policy

Uses corporate reputation to support ideological causes and/or organizations hostile to freedom of expression. Medium Risk

Polen Capital integrates DEI into all of its business practices. It "is committed to embedding diversity, equity, and inclusion across our business" (1). Otherwise, it has not supported ideological causes or policies (2).

Uses corporate funds to advance ideological causes, organizations, or policies hostile to freedom of expression. High Risk

Polen Capital funds Out In Finance, which pushes for LGBTQ equality (12)(3).

Uses corporate political contributions for ideological, non-business purposes.

N/A

Polen Capital does not operate a PAC or engage in lobbying at this time (1)(2)(3).

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