



Polen Capital Management

Locations: Florida (HQ)
Industries: Diversified Financials

RISK LEVEL:



Medium Risk

DESCRIPTION:

Polen Capital Management is Medium Risk. The company often yields to political activism in shaping corporate governance, potentially alienating consumers, dividing employees, and harming shareholders. The company implements race and identity-based policies that replace merit, excellence, and integrity with preferential treatment and outcomes. Polen Capital occasionally embraces corporate initiatives that redirect its central focus from business goals to partisan policies and divisive issues at times. This approach fails to safeguard free exercise, free speech, and free enterprise.

Corporate Weaponization

Has canceled 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 its business practices, "consider[ing] ESG issues and business issues as one and the same" (3). However, Polen Capital has not publicly canceled customers, suppliers, or vendors based on political views or religious beliefs (4).

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 charitable organizations based on views or beliefs (1).

Employment policies fail to protect against viewpoint or other discrimination and/or are ideological in nature. **High Risk**

Polen Capital appears to prioritize diversity over merit in its recruitment and hiring process. From its 2023 Sustainability Report: "We are committed to leveling the playing field, and we encourage women, men, people of color, veterans, the LGBTQ+ community, and those returning to the workforce to apply for positions even if they do not necessarily check every box outlined in the job description, including education level."(1). Polen Capital does not provide viewpoint protections for its employees (2).

Corporate Governance and Public Policy

Uses corporate reputation to support causes, organizations, or policies hostile to freedom of expression.

High Risk

Polen Capital is a signatory to the CFA Institute's Diversity, Equity, and Inclusion Code, indicating its support of DEI in its recruitment, hiring, onboarding, and promotions. Furthermore, the company pledges to integrate DEI into its policies, promote DEI in the investment industry, and provide regular reporting on its DEI metrics to the CFA Institute (1)(2)(3)(4). Polen Capital supports DEI within its business practices. It "is committed to embedding diversity, equity, and inclusion across our business" (5).

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

High Risk

As part of its D&I recruitment and to "close the equity gap", Polen Capital partners with Out In Finance, The Pat Tillman Foundation, and the Toigo Foundation (1). Otherwise, there are no publicly known cases of Polen Capital using corporate funds to advance ideological causes, organizations, or policies (2).

Uses corporate political actions and/or financial 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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