

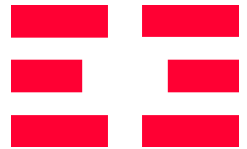


Wellington Management

Locations: Massachusetts (HQ)

Industries: Diversified Financials

RISK LEVEL:



High Risk

DESCRIPTION:

Wellington will not invest in portfolios that contain investments in a variety of industries, including tobacco and nuclear energy. Due to its implementation of ESG-based divestments and similar practices, Wellington was one of 53 asset managers to receive a letter from a coalition of 21 state attorneys general raising concerns about the legal dangers of ESG investing, activism, and hiring schemes that the company embraces. By complying with the HRC's controversial demands, Wellington increases the risk of dividing employees, alienating customers and harming shareholders. The company covers transgender-related medical costs for its employees and their children and provides specific sexual orientation and gender identity-based benefits. It also uses sex and gender ideology criteria in marketing and philanthropic support. Wellington forces employees to undergo multiple ideological trainings and uses its reputation, corporate funds, and political influence to support controversial sex and gender ideologies, organizations, and legislation. Wellington has engaged in a variety of corporate activism, including the Corporate Call to Action and CEO Action for Diversity and Inclusion. The company 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. Wellington Management does not provide viewpoint protections for employees, and the company has funded the National Urban League. For these reasons, Wellington Management receives a High 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. **High Risk**

Wellington will not invest in portfolios that contain investments in a variety of industries, including tobacco and nuclear energy (1). Wellington Management integrates ESG into all of its business practices. Wellington Management was one of the 53 asset management companies addressed in a letter issued by 21 state attorneys general regarding the legal dangers of ESG investing (2).

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

Wellington Management does not discriminate against charitable organizations based on views or beliefs. The Wellington Management Foundation funds "organizations that provide access for all youth in our communities to educational experiences that will enhance their chances for future success." Eligibility requirements state that the Foundation will fund "religiously affiliated organizations that are inclusive of all participants regardless of religious background and beliefs" (1). Wellington Management has an employee matching program, but nonprofit eligibility details are not publicly available (2).

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

High Risk

Wellington Management indicates the company forces employees to attend multiple, controversial trainings on gender identity, sexual orientation, transgender issues, and divisive racial ideology. The company provides gender transition guidelines for its employees and a specific benefits guide with a comprehensive explanation of transgender services funded by the company (1)(2). Wellington Management does not appear to provide viewpoint protections for its employees, though it defines diversity as including "beliefs and value systems" and "philosophical thought processes" (3). Wellington Management is a signatory of the CEO Action for Diversity & Inclusion pledge (4).

Corporate Governance and Public Policy

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

High Risk

Wellington Management indicates the company agrees to allow a controversial stakeholder group focused on sexual identity issues to dictate marketing or advertising strategy (1)(2). By doing so, the company risks dividing employees, alienating customers and harming shareholders. holds employee DEI training, including generational diversity, gender diversity, unconscious bias and micro-inequities, transgender awareness, and cultural diversity (3). Wellington Management supports ESG within its business practices. The company is a founding member of the Net Zero Asset Managers Initiative, which commits to net zero activist investing (4)(56)(7). Wellington is also a CERES Network Member and participant in Climate Action 100+ (8)(910)(11)(1213)(14)(15).

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

High Risk

Wellington Management indicates the company covers transgender related costs for its employees and their children, including paid short-term leave, puberty blockers, cross-sex hormones, chest surgeries, genital surgeries, medical visits and lab monitoring, travel and lodging. Additionally, the company has pledged philanthropic support of at least one organization or event that promotes sex and gender ideology (1)(2). By allowing a political stakeholder group to dictate operations, the company increases health care costs and risks dividing employees, alienating customers and harming shareholders. Wellington Management donates to The National Urban League, which engages in DEI and pro-abortion advocacy (3). Wellington is a Brass Sponsor of Out & Equal, an LGBTQ advocacy group (4).

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

High Risk

Wellington Management indicates the company publicly advocated for controversial sex and gender ideology through local, state or federal legislation or initiatives (1)(2). By allowing a political stakeholder group to dictate operations, the company risks dividing employees, alienating customers and harming shareholders. Wellington Management does not operate a PAC or report on its lobbying at this time (3)(4)(5).

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