Committee on Investor Responsibility (CIR)

Voting Guidelines

SWARTHMORE

Contents

1.0 Introduction

This document outlines voting guidelines as per recommendations from the Committee on Investor Responsibility (CIR) and the Swarthmore College Finance and Investment Office.

The CIR, after consultation with the Investment Committee, may vote potential shareholder resolutions involving four social issues:

- Coalition for Socially Responsible Economies (CERES) Principles
- Equal Employment Opportunity
- Global Reporting Initiative (The GRI was established in 1997 with a mission to evaluate sustainability reporting to equivalency with financial reporting.)
- International Labor Organization (ILO) Principles

CIR consists of student members; staff members, Suzanne Welsh, Mark Amstutz and Carmen Duffy; and Investment Committee members, Samuel Hayes, III and Christopher Niemczewski.

CIR will provide an update on the voting guidelines and voting results of specific company resolutions on an annual basis.

2.0 Voting Guidelines

2.1 CERES Principles

Issue Summary:

The Coalition for Socially Responsible Economies (CERES) is a coalition of over 80 organizations including environmental groups, investors, analysts and advisors representing over $300 billion in invested capital, and public and advocacy groups that are working towards creating a sustainable future.

Companies commit to continuous environmental improvement and a single set of consistent standards for environmental reporting, by endorsing the CERES principles, a ten-point code of environmental conduct.

CERES Principles

1. **Protection of the Biosphere**
   We will reduce and make continual progress toward eliminating the release of any substance that may cause environmental damage to the air, water, or the earth or its inhabitants. We will safeguard all habitats affected by our operations and will protect open spaces and wilderness, while preserving biodiversity.

2. **Sustainable Use of Natural Resources**
   We will make sustainable use of renewable natural resources, such as water, soils and forests. We will conserve non-renewable natural resources through efficient use and careful planning.

3. **Reduction and Disposal of Wastes**
   We will reduce and where possible eliminate waste through source reduction and recycling. All waste will be handled and disposed of through safe and responsible

methods.

4. **Energy Conservation**
   We will conserve energy and improve the energy efficiency of our internal operations and of the goods and services we sell. We will make every effort to use environmentally safe and sustainable energy sources.

5. **Risk Reduction**
   We will strive to minimize the environmental, health and safety risks to our employees and the communities in which we operate through safe technologies, facilities and operating procedures, and by being prepared for emergencies.

6. **Safe Products and Services**
   We will reduce and where possible eliminate the use, manufacture or sale of products and services that cause environmental damage or health or safety hazards. We will inform our customers of the environmental impacts of our products or services and try to correct unsafe use.

7. **Environmental Restoration**
   We will promptly and responsibly correct conditions we have caused that endanger health, safety or the environment. To the extent feasible, we will redress injuries we have caused to persons or damage we have caused to the environment and will restore the environment.

8. **Informing the Public**
   We will inform in a timely manner everyone who may be affected by conditions caused by our company that might endanger health, safety or the environment. We will regularly seek advice and counsel through dialogue with persons in communities near our facilities. We will not take any action against employees for reporting dangerous incidents or conditions to management or to appropriate authorities.

9. **Management Commitment**
   We will implement these Principles and sustain a process that ensures that the Board of Directors and Chief Executive Officer are fully informed about pertinent environmental issues and are fully responsible for environmental policy. In selecting our Board of Directors, we will consider demonstrated environmental commitment as a factor.

10. **Audits and Reports**
    We will conduct an annual self-evaluation of our progress in implementing these Principles. We will support the timely creation of generally accepted environmental audit procedures. We will annually complete the CERES Report, which will be made available to the public.

Over 70 companies have endorsed the CERES principles including several small and medium sized companies and multinational corporations such as Coca-Cola, Ford Motor Company, General Motors Corporation, Nike and Bank of America.

Given the growing consensus regarding the importance of the CERES principles, highlighted especially by the growing number of companies endorsing them, and for the reasons stated below, **we propose that Swarthmore adopt a general policy of voting in favor of such resolutions during this and future proxy seasons.**

Arguments supporting resolutions calling for the endorsement of the CERES principles

- Given investors' needs for credible information about a firm's environmental performance and given the number of companies that have already endorsed the CERES Principles and adopted its report format, it is a reasonable, widely accepted step for a company to endorse these Principles if it wishes to demonstrate its seriousness about superior environmental performance.

- Recent studies show that the integration of environmental commitment into business operations provides competitive advantage and improves long-term financial performance for companies. (Source: Investor Research Responsibility Center)

- In addition, the depth of a firm's environmental commitment and the quality with which it manages its environmental performance are indicators of prudent foresight exercised by management.

- Endorsing the Principles provides a mechanism that helps managers move a company beyond a focus on compliance to that of continuous innovation and improvement in resource productivity and safety.

Arguments against supporting resolutions related to the endorsement of the CERES principles

- Companies can argue that their ongoing environmental programs may already follow many of the tenets of the CERES principles, thus making a formal endorsement of these principles redundant.

- Compliance with the CERES principles and payment of the associated administrative dues may be an administrative burden and a financial drain on the company's resources.

Economic Impact Analysis:

The primary direct costs of endorsing the CERES Principles are the payment of annual dues and the completion of the annual CERES report form. The dues for a company differ according to the size of the company, but, for a large multinational corporation, are usually in the range of $50,000 dollars a year. The costs associated with dues are not prohibitive considering the size and the budget of the companies.

The completion the CERES report form may require considerable time and effort, and depending on the thoroughness of the company's existing environmental reporting system, some costs may be incurred in this area.

Another major cost for the company lies in the actual implementation of the principles to its various operations. By endorsing the CERES principles, a company is committing to improving environmental standards, and more specifically to "update their practices in light of advances in technology and new understandings in health and science" (Source: www.ceres.org). Updating and constantly improving their environmental standards may prove costly, but studies have shown that, integration of environmental commitment into long-term operations provides the company with a comparative advantage (Source: IRRC).

Precedent:

The CIR has, in principle, already endorsed the CERES principles in 1999. Swarthmore College has shown a commitment on this issue, by voting on a resolution calling for the endorsement of the CERES principles at Allstate Insurance, in the 2001-02 proxy seasons.

The issue of endorsing the CERES principles is in line with Swarthmore's commitment to better global environmental stewardship, which is illustrated in our efforts to harness recyclable energy sources like wind-energy to generate 2.5% of our energy needs and in our longstanding commitment to recycling.

Exceptions:

We believe that, in general, the interests of the company would be better served if it decides to endorse the CERES principles. However, each company at which we vote on such shareholder resolutions will be carefully scrutinized for extenuating circumstances which would contradict the points outlined above.

Therefore, assuming the CIR has done due diligence to determine that the company targeted by a shareholder resolution has no extenuating circumstances, Swarthmore College will vote YES on all resolutions proposing the endorsement of the CERES principles.

2.2 EEO Policy

Issue Summary:

In recent years, U.S. institutional investors and other interested parties have expressed wide support for expansion of corporations' equal employment opportunity, nondiscrimination and affirmative action policies, programs and performance.

While federal law prohibits discrimination in the workplace based on race, sex and other categories, no federal legislation protects gay, lesbian, bisexual and transgender (GLBT) workers in private employment from discrimination based on their sexual orientation. Only 13 states have made it illegal to fire someone based on their sexual orientation. American Corporations, though, increasingly recognize the importance of protecting GLBT individuals from unfair employment practices, with more than 60 percent of the Fortune 500 barring discrimination based on sexual orientation through their nondiscrimination policies. Over 85% of Fortune100 Companies have adopted written policies prohibiting discrimination and harassment on the basis of sexual orientation.

Pension funds, social investment firms, religious investors affiliated with the Interfaith Center on Corporate Responsibility, advocacy organizations and individuals have filed 28 shareholder resolutions for 2003 that address equal employment opportunity and affirmative action, down only slightly from 33 in 2002. Two-thirds of the 2003 resolutions focus on including sexual orientation in corporate nondiscrimination policies, and New York City pension funds have filed the bulk of these resolutions. Seven of these resolutions have been withdrawn.

Swarthmore joined in co-filing two of these resolutions, at the Masco and Dover corporations in 2003. The college was able to withdraw both resolutions after the companies agreed to broaden their nondiscrimination policies. Given this growing consensus on the importance of corporate nondiscrimination codes that include sexual orientation, and for the reasons stated below, **we propose that Swarthmore adopt a general policy of voting in favor of such resolutions during this and future proxy seasons**.

Arguments Supporting Equal Employment Opportunity Stockholder Proposals:

•Discrimination based on sexual orientation is a morally wrong and self-defeating business practice.

•Numerous surveys show that gay, lesbian, bisexual and transgendered (GLBT) workers often experience workplace harassment and employment discrimination.

•Banning discrimination based on sexual orientation will allow companies to more effectively compete for top talent in a tight labor market.

•Because there is no federal prohibition of discrimination based on sexual orientation, GLBT employees are dependent on local laws and corporate policies for protection. Being dependent on local laws in the absence of corporate policies, however, can hamper an employee's ability to transfer within a company or take advantage of other job opportunities.

•Bans on discrimination based on sexual orientation reduce turnover and associated costs, and allow employees to focus on their work.

•Prohibiting discrimination based on sexual orientation helps companies gain a public relations advantage with GLBT consumers and investors and their allies.

•Corporations that ignore the need for equal protection for GLBT employees will open themselves up to eventual litigation, as well as bad publicity.

•National public opinion polls consistently find [that] more than three-quarters of Americans support equal rights in the workplace for gay men, lesbians and bisexuals.

Arguments Against Equal Employment Opportunity Shareholder Resolutions:

•Adopting a non-discrimination policy based on sexual orientation could result in companies being criticized and perhaps targeted by conservative groups.

•Some companies question the need to "go beyond legal requirements" in its EEO policy.

Economic Impact Analysis:

If companies were to comply with the resolution, they would incur the costs of summarizing a certain amount of information, preparing a report that would include this summarized data along with some data that companies typically have already assembled, and making their report available. In addition to these immediate costs, some companies argue that statistical data on a work force can be misleading or taken out of context, and that providing such information could make the company vulnerable to unwarranted litigation. The proponents of sexual orientation EEO resolutions maintain that the requested review and modification of policy enhances the companies' competitiveness and increase accountability, helping to protect the company against expensive legal action, poor employee morale and the loss of business resulting from a substandard equal employment opportunity record. In general, the cost of amending nondiscrimination policies is low, while the potential benefits are moderate to significant.

Precedent:

Swarthmore College has shown a commitment to anti-discriminatory employee policy in the past. In fall of 2002 it filed a resolution that led Lockheed Martin to change its discriminatory employment polices with regard to sexual orientation. Swarthmore has voted in favor of EEO

resolutions at Home Depot and Dover. It voted against removing a ban on discrimination based on sexual orientation from AT&T's policy. It also co-filed EEO Shareholder Resolutions at Dover and Masco. The CIR believes that Swarthmore College should continue with the precedent it has set to support the prohibition of discriminatory employee policies at the corporations in which it invests and vote in favor of proxies on this issue. Furthermore, supporting equal employment opportunities for workers is in line with Swarthmore's Quaker values as well as its own EEO hiring policy.

Exceptions:

We can foresee no company that would not benefit from a non-discrimination policy in regards to sexual orientation. However, each company at which we vote on such shareholder resolutions will be carefully scrutinized for extenuating circumstances contradicting the points outlined above.

Therefore, assuming the CIR has done due diligence to determine that the company targeted by a shareholder resolution has no extenuating circumstances, Swarthmore College will vote YES on all resolutions proposing the extension of equal employment opportunity to gay, lesbian, bisexual and transgender employees.

2.3 GRI Standards

Issue Summary:

The Global Reporting Initiative was initially convened by the Coalition for Environmentally Responsible Economies (CERES), a non-profit coalition of over 80 investor, environmental, religious, labor and social justice groups. The GRI was established in 1997 with a mission to elevate sustainability reporting to equivalency with financial reporting. It has recently been established as an organization in its own right.

The GRI has developed a set of core metrics intended to be applicable to all business enterprises, sets of industry-specific metrics for specific types of enterprises and a uniform format for reporting information integral to a company's sustainability performance.

"GRI was established to develop, promote, and disseminate a generally accepted framework for sustainability reporting - voluntary reporting on the economic, environmental, and social performance of corporations and other organizations" (http://www.globalreporting.org) . The 11 principles, according to the GRI Sustainability Reporting Guidelines, are transparency, inclusiveness, auditability, completeness, relevance, sustainability context, accuracy, neutrality, comparability, clarity, and timeliness.

The GRI standards are structured around a CEO statement, key environmental, social and economic indicators, a profile of the reporting entity, descriptions of relevant policies and management systems, stakeholder relationships, management performance, operational performance, product performance and a sustainability overview. Given the growing consensus on the importance of transparency, and for the reasons stated below, **we propose that Swarthmore adopt a general policy of voting in favor of such resolutions during this and future proxy seasons.**

Arguments Supporting the endorsement of GRI:

- For financial reporting, companies follow a generally accepted reporting framework (GAAP) established by Financial Accounting Standards Board (FASB). GRI

guidelines provide a similar framework that will enhance an organization's credibility, consistency, and comparability.

- GRI guidelines address the full spectrum of stakeholder interests and combine this information into one concise document.

- Because the developmental costs of the guidelines and other GRI documents are shared across multiple users in the firm, the overall transaction costs for reporters is low.

Arguments Against the endorsement of GRI:

- There are 57 proposed core indicators. There are then a number of voluntary ones. There is no clear view as to which voluntary indicators should apply to all.

- GRI standards will take considerable company resources to gather.

- Some of the economic indicators are very complex, and it is often questioned if the organization and its stakeholders can correctly interpret the information.

- GRI standards lack performance measurement indicators.

Economic Impact Analysis:

The costs of implementing the GRI guidelines and reporting would generally occur on two fronts. Firstly, by adopting the GRI standards, an organization must commit itself to continually monitoring its adherence to the GRI standards. Secondly, an organization would have to prepare a public report. This might involve considerable time and effort and incur significant costs, depending upon the status of the company's existing reporting system.

Benefits resulting from the adoption of GRI standards are prevalent for both report preparers and report readers. For reporting organizations, the guidelines provide a tool for: management, increased comparability and reduced costs of sustainability, brand and reputation enhancement, differentiation in the marketplace, protection from brand erosion resulting from the actions of suppliers or competitors, networking and communications. For report readers, the Guidelines are a useful benchmarking tool, corporate governance tool and an avenue for long term dialogue with reporting organizations.

Precedent:

The issue of the endorsement of GRI standards is in line with the values of Swarthmore College, and more specifically aligned with the College's commitment to transparency, which is illustrated by the College's support of the CERES principles and our progressive culture.

Exceptions:

We believe that the interests of an organization and its stakeholders would be better served with the adoption of GRI standards. However, each company for which we vote on such shareholder resolutions will be carefully scrutinized for extenuating circumstances which would contradict the points outlined above.

Therefore, assuming the CIR has done due diligence to determine that the company targeted by a shareholder resolution has no extenuating circumstances, Swarthmore College will vote YES on all resolutions proposing the endorsement of GRI standards.

2.4 ILO Principles

Issue Summary:

The International Labor Organization is a specialized, independent agency of the United Nations, based in Geneva, Switzerland, with 175 member countries represented by workers, employers and governments. The ILO aims at promoting decent working conditions for all men and women.

By adopting **ILO 1998 Declaration of Fundamental Principles and Rights at Work**, companies commit to providing basic human and labor rights to their workers and ensure the continual improvement of the working conditions of their workers.

The **1998 Declaration on Fundamental Principles and Rights at Work** sets out the four principles which every ILO member must respect and promote:

1. **Freedom of association and the right to bargain collectively:** Establishes the right of all workers and employers to form and join organizations of their own choosing without prior authorization, and lays down a series of guarantees for the free functioning of organizations without interference by the public authorities. (1948 Freedom of Association and Protection of the Right to Organize Convention) Provides for protection against anti-union discrimination, for protection of workers' and employers' organizations against acts of interference by each other, and for measures to promote collective bargaining. (1949 Right to Organize and Collective Bargaining Convention)

2. **Abolition of forced labor:** Requires the suppression of forced or compulsory labor in all its forms. Certain exceptions are permitted, such as military service, properly supervised convict labor, and emergencies such as wars, fires, and earthquakes. (1930 Forced Labor Convention) Prohibits the use of any form of forced or compulsory labor as a means of political coercion or education, punishment for the expression of political or ideological views, workforce mobilization, labor discipline, punishment for participation in strikes, or discrimination. (1957 Abolition of Forced Labor Convention)

3. **Equal opportunity and treatment in the workplace:** Calls for equal pay and benefits for men and women for work of equal value. (1951 Equal Remuneration Convention) Calls for a national policy to eliminate discrimination in access to employment, training and working conditions, on grounds of race, color, sex, religion, political opinion, national extraction or social origin, and to promote equality of opportunity and treatment. (1958 Discrimination (Employment and Occupation) Convention)

4. **The elimination of child labor:** Aims at the abolition of child labor, stipulating that the minimum age for admission to employment shall not be less than the age of completion of compulsory schooling. (1973 Minimum Age Convention) Calls for the immediate elimination of the worst forms of child labor, including the sale and trafficking of children and child prostitution. (1999 Worst Forms of Child Labor Convention)

These principles are covered by the ILO's core conventions. In addition, many ILO labor standards define acceptable levels of working conditions and worker protection, such as:

1. Occupational safety and health.
2. Working time.
3. Social security pensions and health insurance.

Over the years, governments have changed 2,230 national laws or practices in response to concerns raised by ILO supervisory bodies. Many companies, including automobile giants such as Volkswagen and Daimler-Chrysler have adopted the ILO Labor Standards. As of October 2003, over 1000 companies across the world are participating in the U.N-led Global Compact program that commits the companies to the ILO Labor guidelines.

Labor standards are both an ethical and economic imperative. The increased transparency brought about by adopting the core ILO principles and creating procedures to report on their enforcement would protect the company's reputation and brand identity, improve its appeal to investors, and protect the company from the possibility of future litigation. Therefore, **we propose that Swarthmore College adopt a general policy of voting in favor of such resolutions during this and future proxy seasons.**

Arguments supporting resolutions calling for the endorsement of ILO's 1998 Declaration on Fundamental Principles and Rights at Work

- Given the investors' demands for credible information about a company's adherence to basic human and labor rights and given the number of workers, employers, organizations, and governments that have adopted the ILO standards as the bench mark on workplace rights, it is a reasonable, widely accepted step for a company to endorse the 1998 Declaration of the Fundamental Principles and Rights to protect its reputation and thus, retain its investor confidence and shareholder value.

- According to the U.S. State Department, adoption of ILO standards by all involved parties is integral to removing unfair trade competition. Parties found in violation of the basic ILO principles could face the risk of litigation and could jeopardize the economic well-being of the company. There are a substantial number of countries where organizations such as the U.S. State Department, Amnesty International and Human Rights Watch report that human rights "are not adequately protected by law and/or public policy." Implementation of ILO labor standards would help a company "manage the risk of being a party to human rights violations in the workplace" and serve the broader U.S. foreign policy objectives of promoting human rights.

- By committing itself to the welfare of its workers, through the implementation of ILO standards, a company can increase the levels of worker satisfaction and loyalty, thus boosting company efficiency and brand image.

- Adoption of the ILO labor standards would increase a company's attractiveness to institutional investors. More than 15 of the world's largest pension funds and institutional investors "have adopted responsible contractor and workplace practice guidelines."

Arguments against supporting resolutions related to the endorsement of 1998 Declaration on Fundamental Principles and Rights at Work

- Companies might argue that their labor code already subscribes to all the ILO standards, thus making a formal endorsement of the ILO standards redundant.

- Compliance with the ILO standards and payment of the associated administrative dues due to auditing, monitoring, and reporting may be an administrative burden and a financial drain on the company's resources.

Economic Impact Analysis:

The costs of implementing the ILO guidelines and reporting on the same would primarily occur on three fronts. Firstly, by adopting the ILO labor standards, a company would have to upgrade its

facilities to provide workers with decent working conditions, if that might not already be the case. Secondly, a company would have to continually monitor its adherence to the ILO standards and ensure that its suppliers are doing the same. This might lower the number of suppliers and thus, increase production costs. Thirdly, a company would have to prepare a public report concerning the implementation of ILO standards. This might involve considerable time and effort and incur some costs, depending upon the status of the company's existing reporting system.

Benefits resulting from the adoption of ILO labor standards would be an improved image for the brand and the possible avoidance of future lawsuits that might have been incurred by current business practices. Increased worker satisfaction and loyalty might result in productivity gains and lower retrenchment costs.

Precedent:

Swarthmore College has shown a commitment to this issue, by voting on a resolution calling for the endorsement of the ILO labor guidelines at Phillip Morris, in the 2001-02 proxy seasons. Earlier in 1999, the Committee for Socially Responsible Investing agreed to endorse resolutions supporting the ILO 1998 Declaration on Fundamental Principles and Rights at Work in principle, while carefully scrutinizing each resolution.

The issue of endorsing ILO **1998 Declaration on Fundamental Principles and Rights at Work** is in line with Swarthmore College's commitment to basic human and labor rights for all, which is illustrated by our progressive anti-discriminatory policies and our Quaker heritage.

Exceptions:

We believe that, in general, the interests of the company would be better served if it decides to endorse the ILO 1998 Declaration on Fundamental Principles and Rights at Work. However, each company at which we vote on such shareholder resolutions will be carefully scrutinized for extenuating circumstances which would contradict the points outlined above.

Therefore, assuming the CIR has done due diligence to determine that the company targeted by a shareholder resolution has no extenuating circumstances, Swarthmore College will vote YES on all resolutions proposing the endorsement of the ILO 1998 Declaration on Fundamental Principles and Rights at Work.

2.5 Reporting on Political Contributions

Issue Summary:

The issue of political contributions came to the fore nationally when the Bipartisan Campaign Reform Act (BCRA), sponsored by Sens. John McCain (R-Ariz.) and Russ Feingold (D-Wis.) (with House sponsors Christopher Shays (R-Conn.) and Marty Meehan (D-Mass.)) passed Congress in March 2002 and took effect on Nov. 6. The law bans contributions by corporations, labor unions and other groups to national political parties, doubles the limit on the amount of hard money that individuals can give to candidates and leaves the regulation of political action committees unchanged.

Soft money, given to national political parties for party-building activities such as get-out-the-vote campaigns, became illegal as of Nov. 6, 2002. Local parties will be permitted to collect soft money donations of up to $10,000 per donor per year. Under current federal election law, individuals may contribute $2,000 per election, per candidate (with primary election and general election counting as separate contests).

Not all avenues of political contributions have been addressed by the BCRA as it does not restrict contributions made to tax-exempt 527 organizations. These 527 organizations are non-profit political committees used by corporations, labor unions, and special interest organizations to raise money to influence political campaigns.

Since political contributions made by a corporation to 527s are not regulated by the BCRA, there is a need for corporations to report to the shareholders the nature and the amount of the contributions made.

Arguments Supporting the Reporting on Political Contributions:

- Transparency allows shareholders to make sure that corporate dollars are backing candidates in a way that will truly benefit the corporation.
- While information on the corporation's political donations is available on various websites, a comprehensive list including the rationale behind any donations is necessary for shareholders to understand the corporation's policy.
- Information about all corporation's political donations can be found through the Federal Election Commission (FEC). However, it is difficult to access for the average shareholder and synthesizing all information about contributions in a single report would make the whole process easier.
- The increased transparency would improve the corporation's reputation for honesty and compliance with the law, which would in turn bolster the corporation's public image.

Arguments Against Reporting on Political Contributions:

- This resolution may be unnecessary: information on corporate political donations is available through the FEC.
- Information about political contributions could carry the implication of wrongdoing and could damage the corporation's reputation if readily available to the public
- Adoption of this resolution could unfairly tilt the playing field to the corporation's disadvantage since the disclosure requirements would not be binding on all corporations.

Economic Impact Analysis:

Providing a report on political contributions made is not likely to incur significant costs to the corporation. Some costs could result from the time required to assemble the report, but it seems unlikely that these would be significant since the corporation already keeps records of its political contributions and provides some information to the FEC.

Precedent:

Swarthmore College has already shown a commitment in the past on reporting on political donations. In the 2003-04 proxy season, the College in favor of resolutions calling for the reporting of political donations at American Express, GE, Wal Mart Stores, Wells Fargo and IBM following the recommendations of the Committee for Socially Responsible Investing.

Exceptions:

We can foresee no company that would not benefit from not reporting the political contributions it makes to its shareholders. However, each company at which we vote on such shareholder resolutions will be carefully scrutinized for extenuating circumstances which would contradict the points outlined above.

For instance, in the 2003-04 proxy season, the CIR recommended abstaining from voting on a resolution at Pepsico that called for the publication of all the donations made by the corporation in the major national newspapers, on account of the prohibitive economic costs associated with implementing the resolution.

Therefore, assuming the CIR has done due diligence to determine that the company targeted by a shareholder resolution has no extenuating circumstances, Swarthmore College will vote YES on all resolutions proposing the reporting of political contributions made to the shareholders by a corporation.