



**The Pension Boards**  
United Church of Christ, Inc.

# **Diversity, Equity, Inclusion, and Belonging (DEI&B) Investment Policy Background**

# Diversity, Equity, Inclusion, and Belonging (DEI&B) Policy Background

## Current State of Diverse Asset Managers

The global asset management industry was \$115 trillion<sup>1</sup> in assets as of year-end 2022 but continues to be predominantly managed by large institutions or non-diverse teams. Multiple studies have proven that diverse teams and organizations drive innovation and better performance. A study published by the Knight Foundation in 2021<sup>2</sup> found that only 1.4% of total U.S.-based Assets Under Management (AUM) in their sample of \$82.24T is managed by diverse owned firms. This is not proportional to the number of diverse owned firms, which is much greater. Thus, diverse managers are not even getting close to their equal share of assets.

## Reason to Act Now

The Global Impact Investing Network (GIIN) framework on integrating racial equity into investment strategies<sup>3</sup> says, “Integrating racial equity into investment strategies requires persistence and deep commitment both organizationally and personally. Existing racial inequities are a result of long-standing, systemic decisions with consequences borne over centuries; undoing them will happen neither quickly nor easily. Within the context of capital markets, people of color are dramatically under-represented as decision-makers and beneficiaries of capital alike. The resulting unequal and unjust allocation and distribution of capital has meant that dominant majority groups (mainly white) have benefited far more from the tools of capitalism than have groups that have been historically and currently marginalized due to race and/or ethnicity.”

The Knight Foundation report<sup>2</sup> says, “While our country has always been diverse, that diversity is not adequately reflected or represented in our financial system. Diversity shapes the future of our economy. Different viewpoints help assess risks, opportunities, and unseen possibilities in traditional and emerging markets. By diversifying who manages our nation’s wealth, we can better tap unforeseen opportunities and build a more equitable and prosperous future for us all.”

## Diversity as a Performance Driver

The Knight Foundation study<sup>2</sup> noted that funds managed by diversely owned firms were overrepresented in the top-performing quartile of mutual funds, hedge funds, and private equity funds. A 2021 report by the National Association of Investment Companies (NAIC)<sup>4</sup> concluded that “diverse managers again beat their benchmarks, including the Burgiss median, for net IRR, MOIC and DPI from 1998 to 2020, and from 2011 to 2020.” An older study by McKinsey in 2015<sup>5</sup>, found that companies in the top quartile of racial/ethnic and gender diversity were 35% more likely to have above median financial returns. A 2015 NYC Diversity Initiative Announcement<sup>6</sup> provided more details on two more studies: 1) The Proceedings of the National Academy of Sciences of the United States of America that racially and ethnically diverse traders had a 58 percent greater ability to calculate accurate pricing and true value of stocks; and 2) 2012 study by Credit Suisse that found that companies with women on their boards delivered higher average returns on equity, lower leverage, better average growth and higher price/book value multiples.

## Resources to Make Capital Accessible

The Global Impact Investing Network (GIIN) formed a 2023 Peer Cohort on Investing to Advance Racial Equity in which both Minoti Dhanaraj and Richard Walters participated. The participants included 16 individuals from 14 organizations to develop a framework to advance racial equity. Monthly discussions included racial equity frameworks, engaging with peers for feedback, and collaborations to find solutions to common implementation challenges. The GIIN racial equity theme has three strategic goals:

- 1) Shifting **Power** by Addressing Racial Bias and Ensuring Equitable Representation and Decision-Making;
- 2) Shifting the Perception of **Risk** through Equitable Deal Sourcing, Due Diligence, and Terms; and
- 3) Increasing Inclusive Capital to Create Equitable Outcomes for Communities of Color (**Justice**)

Other organizations that have resources to assist us in fulfilling our fiduciary duty include: 1) Diverse Asset Managers Initiative (DAMI)<sup>7</sup> which helps educate and raise awareness to key decision makers through studies. They also note the importance of partnering with consultants to diversify their existing pool of investment managers that they recommend to clients; 2) Institutional Allocators for Diversity, Equity, & Inclusion (IADEI) which is a consortium of asset owners that seeks to drive diversity, equity, and inclusion (DEI) within institutional investment teams and portfolios and across the investment management industry. “A recent IADEI survey<sup>8</sup> found that 91 percent of asset owners agreed with the business case to incorporate DEI into selection and monitoring of managers. Twenty-eight percent of members have incorporated DEI language in their investment policy statements, although the language tends to be general;” 3) The Association of Asian American Investment Managers (AAAIM); 4) Interfaith Center for Corporate Responsibility (ICCR); 5) National Association of Securities Professionals (NASP); 6) Toigo Foundation; 7) Sponsors for Educational Opportunity (SEO); 8) Grosvenor Consortium; and others.

A 2014 case study by the W.K. Kellogg Foundation<sup>9</sup> shares some lessons from their experience creating a diverse investment manager program. These include: 1) boards and senior executives must support diversity; 2) consider using a manager of emerging managers; 3) invest with diverse managers in all asset classes; 4) understand the nuances of “emerging managers” and how to “graduate” or hire them directly when they no longer qualify for an emerging manager program due to size; and 5) Conduct ongoing outreach to emerging MWBE manager communities.

## Pension Boards and the United Church of Christ (UCC) Historic Witness and Present Involvement in DEI&B

In 1967, the UCC General Synod declared social values and social justice ought to be given consideration. Then from 1969 to 1985, the UCC divested from all corporations doing business in South Africa in response to apartheid. The Pension Boards-United Church of Christ (PBUCC) has been involved in many activities to further diversity, equity, inclusion, and belonging. This includes being a founding member of ICCR which advocates for racial equity and racial audits. The UCC has a long and distinguished history of racial justice activism and anti-racism. From the defense of the enslaved men of the Amistad, the abolitionist movement, the Wilmington Ten, the ordination of African American Clergy, the modern civil rights movement with Rev. Andrew Young, UCC minister and associate of the Rev. Martin Luther King, to the Join the Movement Campaign led by Dr. Velda Love, the UCC has been at the forefront of civil rights for all.

The newest incarnation of the UCC commitment to anti-racism is the Join the Movement Campaign described at [jointhemovementucc.org](http://jointhemovementucc.org) as follows:

***Join the Movement toward Racial Justice is an invitation to demonstrate God’s love and to partner with others who are working for the transformation of racism in our world so that we might foster flourishing lives for all.***

*As evidenced in the wake of the May 25, 2020, murder of George Floyd, and numerous attacks on our siblings of color across the nation, the movement for racial justice cannot be separated from faith commitments to do justice and love our neighbors. As divides deepen across our country and world, we are being called to grow our capacity for interdependence and nurture connections that value difference and promote equity.*

*Every setting of the UCC, from local churches to global partners, has a role to play in expanding our practices of anti-racism and strengthening our capacities as partners and participants in the burgeoning racial justice movements of our time. In this effort, story-sharing is a key component. Our stories show us not only who we are, but also inspire who we may become. Providing opportunities to encounter the anti-racism journeys of others, Join the Movement will be a hub of story-sharing that draws others to participate and opens hearts to new possibilities and practices of racial justice.*

*The Christian church began as a movement towards a just world through the teachings of Jesus. As followers of Jesus, we believe it is our mandate to work for and seek justice, love, and compassion, as we join with and become our own Spirit-led movements toward racial justice.*

## **UCC biblical and Theological Understandings of Racial Justice<sup>10</sup>**

*For all of you are the children of God. —Galatians 3:28*

*“Each person is created in the image of God. But whenever we devise, maintain or perpetuate systems and structures that oppress people based on race and/or ethnicity, we interfere with God’s purpose and the opportunity for all God’s children to be fully who they are created to be. Racism is an affront to God.*

*Racism is racial prejudice plus power. It is rooted in the belief that one group has racial superiority and entitlement over others. Its power is manifested in every institution and system, both nationally and internationally, which was historically established and continues to function to benefit one group of people to the disadvantage of other groups. Awareness and education will help us to become anti-racist individuals and foster the development of anti-racist systems and institutions that can eliminate privilege for some and oppression for others.*

*The United Church of Christ and its predecessor churches have made a priority commitment to supporting policies and structures that make real our Christian commitment to racial justice. The UCC’s emphasis means more than simply challenging personal prejudices but involves a commitment to in-depth analysis of societal policies and structures that either work toward the elimination of racism or perpetuate it.*



## UCC biblical and Theological Understandings of Racial Justice<sup>10</sup> (continued)

*During General Synod 23 an addendum was added to the 1993 Pronouncement calling the UCC to become a Multiracial, Multicultural Church. The addendum called the UCC to also become an “Anti-Racist” denomination. In doing so, we encourage all Conferences and Associations and local churches of the UCC to adopt anti-racism mandates, including policy that encourages anti-racism programs for all UCC staff and volunteers.”*

## PBUCC’s Commitment to Racial Justice

PBUCC administers retirement, health and benefit plans, and financial services on behalf of UCC clergy and lay church workers. One of the important functions of PBUCC is to invest assets contributed on behalf of our members for their financial wellness.

In June of 2020, the PBUCC signed the “Investor Statement of Solidarity to Address Systemic Racism and Call to Action.” The statement and calls to action are noted below:

**“As investors, we stand in solidarity with protesters and call for the dismantling of systemic racism and recognize our responsibility to act.**

**We recognize that the investor community has contributed to and benefited from racist systems and the entrenchment of white supremacy.** We therefore take responsibility and commit to hold ourselves accountable for dismantling systemic racism and promoting racial equity and justice through our investments and work.

**We acknowledge the deep roots of structural racial inequity.** Since its founding, the United States’ society and economy have been rooted in racist beliefs and systems designed to extract wealth and maintain the power of a white elite.

**We denounce the racist tactics and brutality deployed by law enforcement** and the criminalization, policing, and incarceration of Black men, women, and children, and other people of color in the United States. We recognize that these systems are rooted in racial oppression and serve to perpetuate the racialized criminalization of poverty.

**We denounce the militarization of police and the anti-democratic response to protests,** which interfere with the right to peaceful assembly and only escalates conflict, sowing division and chaos.

**As a community of investors, we embrace and commit to the following five Calls to Action:**

- 1. Commit to actively engage with, amplify, and include Black voices in investor spaces and company engagements, taking direction and guidance from their expertise and lived experience, including on issues related to criminalization.**
- 2. Commit to embed a racial equity and justice lens into our own organizations.** This may include ensuring diversity, equity, and inclusion in hiring, promotion, and compensation at all levels; engaging with stakeholders of color to inform our work; hiring financial managers and consultants of color; and ending business relationships with entities that further white supremacy.

## PBUCC's Commitment to Racial Justice *(continued)*

- 3. Commit to integrating racial justice into investment decision-making and engagement strategies.** At the institutional level, commit to reviewing investment policies, due diligence, and risk management or controversy flags to investigate whether they adequately and explicitly integrate systemic racism concerns and update as necessary. Review portfolio holdings across asset classes to identify investments that reinforce systemic racism. Establish time bound goals to either engage with or divest from companies/issuers with practices or business relationships that further systemic racism or white supremacy, or that enable state violence and criminalization. Direct specific attention to those connected to the prison, military, and immigration industrial complex, including technology, communications, services, and financial sectors, and those that are complicit in state violence.
- 4. Reinvest in communities.** Commit to reinvestment in community-driven alternatives to policing and safety. Make investments in Community Development Financial Institutions, affordable housing, Black-led community development projects, and financing Black entrepreneurs, cooperatives, community land trusts. Make investments in other old and new vehicles to support Black employment, ownership and wealth creation, and community- driven alternatives to policing and incarceration. We commit to promote the goals of communities of color, as determined by those communities, ensuring the benefit of investments are retained by those communities through scaling-up capacities, skills, networks, and resources to facilitate growth in circuits of capital. Seek investments that address structural race gaps in wealth and minimize capital “leakages” by procuring supplies from Black-owned businesses, creating employment for Black people, and reinvesting proceeds in Black communities.
- 5. Use investor voice to advance anti-racist public policy.** Through investor statements, public comments, and collective action, advocate for policies that seek to reform and eliminate systemic racism in law and public policy as well as private ordering. These efforts may span Covid-19 relief package priorities, budget allocation processes, financial and tax policy, as well as policies related to housing, education, voting, criminal justice, corporate regulation, lobbying and campaign finance, public services, environmental health and safety, labor, immigration, political representation, infrastructure investments, research and development, and much more. We will proactively seek to understand and address public and private policies that discriminate against and disadvantage communities of color and advocate to scale-up programs and investments that close historical racial gaps in income, wealth, employment, political representation, access to housing, education and finance, longevity and health and safety.”

PBUCC has sought opportunities to develop and demonstrate a commitment to racial justice in concrete and varied ways. At the Pension Boards, diversity, equity, inclusion, and belonging (DEI&B) are at the heart of our mission. The inaugural “2021 Diversity in Our Workplace Report, 2022 Diversity in Our Workplace Interim Report, and 2023 Diversity in Our Workplace Report”<sup>11</sup> showcase our culture transformation journey, employee stories, demographic data points, Board composition, and how we are incorporating DEI&B into our investments and corporate social responsibility activities.

## PBUCC's Commitment to Racial Justice *(continued)*

Since the investment team's last update in the summer of 2022, we have met with over 20 diverse managers across asset classes. We have also attended various conferences and webinar sessions including IADEI, SEO, National Association of Investment Companies (NAIC), Big Path Capital, among others to learn from peers and gain access to more diverse managers. In early 2022, we surveyed our current managers on their DEI policies, practices, diversity of staff and Board, and targets/goals. We have been using that information to have open conversations with and monitor our managers through meetings with both the portfolio management team and heads of DEI.

We are currently investing in Channing Capital Management, Lumos Capital Group, Neuberger Berman, and Just Climate that are either managed by diverse teams and/or investing to positively impact diverse communities.

One of our current private equity impact managers, **Lumos Capital Group**, invests in companies within the global \$10 trillion human capital development sector focused on education technology, human capital technology & services, and knowledge services & training. The team is led by a group of individuals that include both gender and ethnic diversity. Their portfolio companies can bring positive impact by addressing equity gaps for persons of color in learning and workforce development.

**Neuberger Berman's** Private Equity group has a core objective of improving Equity, Inclusion & Diversity (EID). This includes engaging with their general partners (GPs) during due diligence and encouraging them to create their own policies around hiring, succession, and talent retention. The team also supports GPs to sign onto the Institutional Limited Partner Association (ILPA) Diversity in Action Initiative. The Pension Boards, through the Participating Annuity, is invested in the **Neuberger Berman Private Equity Impact Fund I** which is focused on supporting diverse managers and underserved communities. In addition, the senior leadership team is comprised of women and other leaders from underrepresented groups in the financial system.

Our consultant, **Goldman Sachs Asset Management** (GSAM) is helping us to create a framework for our goals, objectives, and policy development. In addition, we have access to their due diligence of diverse investment managers on their platform and DEI survey results of our investment managers. GSAM is using their platform and network to invest in both diverse investment managers and diverse-led companies. GSAM has a multi-layered DEI evaluation process of investment managers, which not only gathers insights into the demographic makeup but also their DEI policies and implementation efforts, with a goal of tracking progress over time. This includes the firm's commitment to recruiting and retention practices. They believe diverse teams and inclusive cultures can benefit from higher-quality decision-making, broader deal sourcing, and the ability to attract and retain talent.

Regarding collaboration, the investment team works together with our investment committee, investment consultant, investment managers, peers, and other industry organizations to learn about and implement best practices. Some organizations we currently collaborate with include ICCR, Ceres, GIIN, and United Nations Principles for Responsible Investment (UNPRI).

## PBUCC's Commitment to Racial Justice *(continued)*

The 2023 Proxy Season has been a very busy and productive example of the power of engaging corporations on their DEI policies and records and engaging with them to improve their work in developing under representative leadership at the highest levels of corporate America.

The Pension Boards is a founding member and participating faith-based member for over 50 years in the Interfaith Center for Corporate Responsibility. ICCR sponsored resolutions were the second largest number of shareholder actions this year. ICCR members filed 85 resolutions this season asking that many publicly traded companies commit to improved DEI policies and goals.

There were 26 resolutions calling for greater material disclosure of DEI data. The second largest number of proposals called for racial equity audits by companies (25).

A comprehensive racial equity audit (REA) helps companies identify, prioritize, remedy, and avoid adverse impacts on Black, Indigenous, and people of color (BIPOC) stakeholders. The Pension Boards is proud to be a primary supporter of this collaborative and ecumenical work.

At the PBUCC, diversity encompasses all the ways in which people are different. That includes visible differences like race and ethnicity, gender and age as well as invisible aspects like cultural background, class/caste, religion, sexual orientation, disability, and socio-economic position. We hope to incorporate more data supporting the invisible aspects as it becomes more accessible.

### Peer Examples

#### 1. Church Pension Group <sup>12</sup>

Committed to Diversity, Equity, and Inclusion (DEI)

Diversity, equity, and inclusion is fundamental to our efforts across the spectrum of socially responsible investing. We are committed to:

- actively seeking out firms owned by diverse individuals,
- raising diversity as part of investment manager due diligence,
- advocating for more diverse leadership in portfolio companies, and
- participating in industry working groups on advancing DEI issues.

#### 2. Wespath Investment Beliefs <sup>13</sup>

Culture Based Upon Professionalism, Integrity and Diversity

- We strive to build, sustain and grow an inclusive organization. An inclusive culture and decision-making process drives diversity of thought, resulting in improved investment decisions and better client outcomes. We measure our progress and engage with industry participants to advance best practices.
- A disciplined and innovative strategy executed by experienced investment professionals utilizing robust investment tools and information will add value relative to performance benchmarks.
- Our success depends on exercising sound judgment and making ethical decisions aligned with Wespath's core values of integrity, teamwork, mutual respect, customer satisfaction, spirituality and stewardship.



## Peer Examples

### 3. Wespath Investment Policy Statement <sup>14</sup>

Women and/or Minority-Owned Manager Program: UMCBB supports and shall endeavor to identify and retain qualified and sound investment management firms that are owned by women or members of an ethnic minority group or who integrate ESG criteria into their investment philosophies.

Provide the Board with a quarterly report of the investments directed through the Women or Minority-Owned Manager Program.

### 4. Wespath Proxy Voting Guidelines <sup>15</sup>

(G) Governance, G 1.3, Board of directors – Board diversity

Wespath/WII expects companies to disclose the diversity composition of boards and believes that boards are more effective when they are racially, ethnically, culturally and gender diverse. Therefore, WII may vote against directors if:

- They are incumbent members of the board, and the board does not have any female members
- They are incumbent members of the Nominating or Governance Committee, the company is headquartered in the U.S., and the board does not clearly disclose the diversity characteristics, including gender and racial/ethnic identity, of individual board members
- They are incumbent members of the Nominating or Governance Committee, the board is headquartered in the U.S., and the board does not have a minimum of three female directors or does not comprise 30% women, whichever is less
- They are incumbent members of the Nominating or Governance Committee, the company is headquartered in the U.S., and the board does not have any members from a racial/ethnic minority group (relative to the U.S. population)

When casting votes, Wespath/WII may consider whether the board has provided a reasonable explanation for its lack of diversity or disclosure, and whether a vote against a director would negatively impact the overall diversity composition of the board.



## Peer Examples *(continued)*

### 4. **Wespath Proxy Voting Guidelines** <sup>15</sup>

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### 5. **Peer Church Pension Plan**

#### **Diversity, Equity, and Inclusion**

- Our philosophy of active portfolio management recognizes the benefits of diverse teams.
- In searching for public markets managers, staff identifies and conducts additional research on female and minority owned firms that do not meet screening criteria related to levels of assets under management.
- Our diligence process includes an assessment of a manager's senior team diversity and a review of recruitment and hiring practices. The Board encourages management to engage with programs designed to attract candidates from under- served communities to careers in the financial services sector.

### 6. **Mercy Investment Services Proxy Voting Guidelines** <sup>16</sup>

Women and underrepresented persons, including indigenous persons, have long been subject to discrimination in the workplace, including as part of management and other high- income positions, whether through failure of promotion or hire. Companies are required to file federal Equal Employment Opportunity (EEO) reports with the federal government, reporting the diversity composition of their workforce at different levels. Underrepresented persons have also long been subject to discrimination in society and companies should not engage in activities which disparage them or discriminate against them.

## 6. **Mercy Investment Services Proxy Voting Guidelines** *(continued)*

- We support resolutions regarding equal employment opportunity and the elimination of discrimination against underrepresented persons, including assessments of leadership team diversity as well as the preparation of an annual diversity report.
- We support resolutions seeking company disclosure of EEO report filings or calling on companies to report compliance with EEO mandates.
- We support resolutions seeking companies to disassociate themselves from disparagement of women and underrepresented persons.
- We support resolutions requesting a company report on the use of and risk of racial discrimination in their current hiring and promotional practices including criminal background checks for the company's employees, independent contractors, and subcontracted workers.

Mercy Investments Board approved a five-year strategic plan from 2023-2027. This will include developing a comprehensive diversity, equity, and inclusion strategy that includes governance service, investment and organizational decisions.

## 7. **Rockefeller Brothers Fund**<sup>17</sup>

Increasing the percentage of our endowment invested in firms that reflect majority ownership by women and/or people of color and seeking to advance meaningful leadership and pipeline opportunities for women and/or people of color by all our asset managers.

## 8. **Illinois State Board of Investment**<sup>18</sup>

ISBI's Diversity Policy seeks to increase access and opportunities for managers, broker/dealers, and investment banks owned by minorities, women, and persons with a disability.

## 9. **Private University Endowment**

The Administration will align its investment management policies and practices with larger University efforts to foster and promote DEI. The University will develop an in-house ranking system for each manager across portfolios, which includes performance, ESG and DEI considerations.

For current managers, the in-house ranking system will assign ESG and DEI scores for each firm, based on their current demographics and policies related to staffing, compensation, investment banking and brokerage activities. Future goals and action items for each manager will be logged and monitored by the Administration, and If no meaningful progress is noted over a 12-month period, a search for a suitable alternative may be initiated and manager may be notified of being placed on our watch list.

For new investment mandates, the Administration will strive to include at least two (2) minority-owned investment firms in each search and keep detailed notes behind rationale for each final decision, including but not limited to, performance and DEI considerations. In the Growth Pool, the Administration will intentionally raise the percentage of market value with African American owned managers to approximately 13% of assets under management across each individual asset class by the end of fiscal year 2024. This would reflect total amounts committed to African American owned private funds that call capital, rather than just the amount called.

## 10. Employees' Retirement Fund of the City of Dallas<sup>19</sup>

### Next Generation Investment Manager Program

The Board approved a dedicated allocation to the Next Generation Investment Manager Program of a target of 10% within an acceptable range of 5% to 20% of the total portfolio (added 10/17). The assets allocated to this program may be invested in all asset classes. The purpose of the program is to: generate investment returns by identifying earlier stage investment managers with strong performance; provide access to investment opportunities that may otherwise be overlooked; discover and cultivate the next generation of external portfolio management talent; and increase diversification among the Fund's investment managers. The criteria for Next Generation Investment Managers are defined by the Board (added 07/15).

## 11. Large U.S. Based Foundation

The Investment department promotes the Foundation's values of diversity, equity, and inclusion ("DEI") by: (1) including investments with women- and minority-owned investment firms in the Foundation's investment portfolio; (2) undertaking DEI initiatives in collaboration with Foundation staff and in the investment community; and (3) incorporating these values in the day-to-day management of the Investment department.

## 12. United Church Funds (UCF)<sup>20</sup>

### Section: Investment Consultants

Within the construct of all these fiduciary duties, there are: (1) the duty to fully and equitably evaluate talent in all its forms and from all potential sources; (2) the recognition that diverse owned asset managers often represent undiscovered and overlooked sources of alpha; (3) the responsibility to leverage UCF's considerable breadth – both internally and externally – in the sourcing and identification of manager skill; (4) the authority to implement a diversity, equity and inclusion (DEI) approach to manager selection that emphasizes inclusion; (5) the duty to manage assets principally through the lens of justice; and (6) the ability to implement and enforce the highest standards of excellence within a comprehensive ESG framework where diverse governance structures are valued.

### Section: Investment Guidelines

#### Diversity, Equity & Inclusion

UCF acknowledges that the investor community, through intentional and unintentional practices, has historically constructed and perpetuated systems of patriarchy and racism. This includes practices that uphold white privilege.

We believe that investors also hold the power to dismantle these systems. We also believe that justice includes a prophetic, restorative invitation to include those that have been denied access to participate in the resources and wealth of the community. We further believe that diverse teams build stronger businesses, make better decisions and can drive outsized returns

## Section: Investment Guidelines (continued)

In the U.S. context and setting, UCF views DEI in terms of historically under-represented groups (HUGS), particularly the experiences of the black community. We seek to implement DEI commitments across all of our organizational activity including, but not limited to, staff, board and investment committee membership; investment manager and consultant selections; investment holdings; and shareholder engagements, proxy voting and public advocacy.

In global settings outside the U.S., UCF acknowledges that the understanding of DEI is highly contextual, varying widely across regions and countries. Therefore, UCF will seek to fulfill its DEI commitments as appropriate for particular settings and will do so in consultation and dialogue with organizational partners, investment managers and subject-matter experts.

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