



Domini's Commitment to Justice, Equity, Diversity, and Inclusion



Introduction

We believe in the inherent dignity and the equal and inalienable rights of all members of the human family as the foundation of freedom, justice, and peace in the world.

The UN Guiding Principles on Business and Human Rights state:

“Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.”¹

We agree with these principles and therefore seek to promote diversity, equity and inclusion and join efforts to eliminate racial injustice and end all forms of discrimination. We have a commitment to non-discrimination and seek to address manifestations of systemic racism. Diversity generally refers to the different characteristics or identities between people and within teams, companies, communities and systems. We view the term 'diversity' broadly to include race, ethnicity, gender, gender identity, income, age, disability status, sexual orientation, and religion among other biological, socio-economic characteristics. In our approach, racial justice refers to “the systematic fair treatment of people of all races, resulting in equitable opportunities and outcomes for all”² which enables all people to have the dignity, resources, power, and self-determination to fully thrive. We also recognize the importance of considering intersectionality, and the way in which different dimensions of someone's identity may influence their experience, opportunities, or discrimination.³ We strive to take responsibility for, and where necessary, take action to address our impact on justice, equity, diversity, and inclusion (“Justice and Diversity”) across our portfolios, firm, and global community.

Our written Commitment to Justice, Equity, Diversity, and Inclusion (the “Plan”) recognizes the dual roles we serve in our society – as investors and as a business. Our impacts primarily occur through our investments; however, our firm's nexus to Justice and Diversity is an area for potential human rights impact that we seek to recognize and address here. We recognize that the system is not external to us, we are of it, affecting it and affected by it. Therefore, we believe that addressing Justice and Diversity requires deliberate and proactive efforts from all stakeholders including companies, investors and policy makers.

As a founding signatory of the UN Guiding Principles, we use the human rights framework to guide our development of the Plan and our planned actions.

¹ https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

² <https://www.racialequitytools.org/glossary>

³ Crenshaw, Kimberle, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics," University of Chicago Legal Forum: Vol. 1989: Iss. 1, Article 8. Available at: <http://chicagounbound.uchicago.edu/uclf/vol1989/iss1/8>.

Section I. As Investors

Goals and Actions

As an organization, our greatest leverage point for influence on Justice and Diversity is as investors. Domini has had leading human rights standards and practices in our investment processes since our inception. As a respected and long-standing impact investor, our voice has the potential to impact corporations globally, as well as the financial community. As such, we will work to redouble our commitment to human rights by taking more explicit and focused action on Justice and Diversity. We will use our tools of standards, engagement and investing to help support and promote diversity and justice.

The following chart documents the goals we seek to achieve and related actions, as well as providing the context and history of our past work:

<p>Standards</p>	<p><u>Goal:</u> <i>Elevate Justice and Diversity considerations</i> in our decision-making across all industries in order to promote justice, equity, diversity, and inclusion.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Annually consider additional or amended key performance indicators that explicitly address issues of Justice and Diversity as guided by our processes. <ul style="list-style-type: none"> ○ Monitor emerging best practices on data, company expectations, and regulatory frameworks and consider relevant updates to Domini’s Impact Investment Standards (“Standards”). ❖ We consider companies ensuring Indigenous communities have the right to free, prior and informed consent (FPIC) and recognize their right to self-determination as a positive indicator in our research and in certain industries is considered a key performance indicator in our assessment. ❖ We seek fixed income investments that support historically underserved communities and their access to capital for necessary infrastructure. ☑ In 2019, Domini formalized its practice of excluding private prison operators and immigration detention centers as a part of addressing systemic racism. ☑ In 2020, Domini formally adopted diversity and inclusion as a universal key performance indicator across all industries. Prior to that, Domini had informally implemented diversity as a singular universal KPI since 2018. ☑ In 2021, we updated our Standards to integrate racial equity into our Global Community theme. These Standards are core to the investments we make. Inclusion of our commitment to racial justice in our Standards will integrate this consistently across the research process, provide better communication and greater transparency to our investors and the financial community. ☑ In 2023, we updated and integrated intersectionality between race and gender as a part of our universal KPI with emphasis on representation of women of color at the board level as well as at the executive management level.
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	<p>☑ In 2023, we updated and integrated intersectionality between diversity and just transition in the context of climate change as a part of the universal KPI including race, gender, income among other characteristics. The integration specifically considers each of the stakeholders both for challenges and opportunities to ensure just transition relates to workers, customers, local communities including indigenous communities as well as suppliers in the context of climate change.</p> <p><u>Context and History:</u> Since Domini’s inception, we have incorporated several themes to promote Justice and Diversity, end discrimination, and ensure respect for communities that have been historically underserved, marginalized, and affected by poverty and inequality. Domini has considered diversity to be a core tenant of a well-managed, forward-looking company since its inception. We have considered race, ethnicity, and gender diversity on boards, executive management teams, and workforces as a positive indicator particularly in certain industries such as banking and media.</p> <p>We have included respect for the rights of Indigenous peoples in our Standards and expect companies and issuers to ensure Indigenous communities have the right to free, prior and informed consent (FPIC) and recognize their right to self-determination. In addition, we have existing key performance indicators that are industry-specific and capture many issues related to race, ethnicity, and gender, e.g., composition of board and executive management, predatory lending, affordable housing loans, or community health impacts. We have sought and invested in fixed income investments in communities and regions that have historically been deprived of access to capital for necessary infrastructure such as affordable housing, healthcare, education, sanitation, and transportation. We have been a voice at the table for environmental justice to call for a safe, clean, and equitable environment for all, with fair treatment and involvement of communities.</p> <p>Historically we avoided investment in publicly traded companies significantly involved in for-profit prison and immigration detention operations due to the serious civil and human rights abuses that occur, particularly for communities that have been historically underserved, marginalized, and affected by poverty and inequality, when operated to extract profit rather than as a public good. This policy was formalized in 2019.</p>
<p>Engagement</p>	<p><u>Goal:</u> <i>Stimulate disclosure and respond</i> to the data; encourage business models and stakeholder relationships that further diversity including race, ethnicity, gender, income, and disabilities.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to engage with companies to encourage assessment of impacts of the business on Justice and Diversity. As needed, encourage the adoption of policies and practices to further racial justice and diversity through business models and relationships with stakeholders, including by identifying and taking remedial measures (reparations) for any harm caused related to systemic and structural racism, systemic and structural discrimination based on gender or sexual

orientation or identity, and other forms of discrimination. Encourage best practices to foster inclusive and equitable representation, access and opportunity and to remove barriers to access to products and services for historically underrepresented groups.

- ❖ Continue to engage with companies on workforce equity issues, worker-driven solutions, just transition, and related disclosures, noting potential disparate impacts on Black, Indigenous and People of Color (BIPOC) workers and consider the intersectional effect of other socio-economic characteristics such as race, gender, gender identity, disability, religion, and income.
- ❖ Continue to apply a racial justice lens, center affected communities, and look to affected communities for guidance and leadership on expectations and priorities.
- ❖ Regularly review and update proxy voting guidelines regarding diversity (subject to oversight and approval by the Domini Funds Board of Trustees) and amplify the impact of our voting practices through communications with issuers and our impact reporting.
- ❖ Continue to engage on relevant public policy and support corporate reporting that enables more robust analysis of diversity and justice.
- ❖ While acting independently and exercising its sole discretion on investment decisions, proxy voting, or engagement with issuers, continue to build relationships, foster industry collaboration and field building to advance justice and diversity through investing, coherence of expectations, and investor momentum.
- Evaluate opportunities to assess and transparently communicate outcomes of engagements on advancing racial equity, gender and racial diversity and building a society that is fair and equitable for all.
- ☑ Since Domini's inception in 1991, our proxy voting guidelines have included diversity requirements for voting on board composition.
- ☑ Since Domini's inception in 1991, we have supported shareholder resolutions that have asked for reports that company undertake studies to assure that all women and historically underrepresented groups are paid comparably to their counterparts.
- ☑ In 2019, Domini adopted a new board diversity proxy voting standard and began opposing the election of some or all directors related to racial and gender diversity. We vote against some or all board members where historically underrepresented ethnic and racial groups make up less than 40% or at least three members of the board (whichever is greater). We vote against some board members where women make up less than 40% or three (whichever is greater) members of the board. We vote against the entire slate of nominees if there are no female or no persons from historically underrepresented racial groups on the board.
- ☑ In 2022 and through Q3 of 2023, Domini conducted 64 and 96 engagements, respectively, on justice and diversity, including on board diversity, racial equity audits, workplace discrimination, gender, industry proxy voting practices, public speaking about our Plan, engagements with policy makers on relevant public

	<p>policy, and incorporated a racial justice lens into 198 and 122 engagements for each period.</p> <ul style="list-style-type: none"> ☑ Regularly engage issuers on gender representation on corporate boards, with an emphasis on markets where women are under-represented. For many years, Domini has engaged with Japanese issuers to encourage increased representation of women on the board, recommending specific actions, including setting targets, building a pipeline of qualified candidates, hiring search firms to help them increase diversity, and joining organizations for peer learning. <p><u>Context and History:</u> We believe that racial and gender diversity on boards helps to mitigate governance risks and promote a more equitable workplace. Companies with diverse leadership are more likely to better understand customer needs, anticipate new societal trends and emerging issues, and foster cooperation with their workforce and communities. Having diverse leadership also helps deter discriminatory practices and fosters a culture of tolerance and inclusiveness throughout an organization.</p> <p>Throughout our history, Domini has engaged companies to promote racial and gender diversity in company management through letter writing campaigns, shareholder proposals, company dialogues, and voting our proxies.</p> <p>In 2019, we adopted a new proxy voting standard for diversity on boards. In markets where the information is available, the Domini Funds now oppose the election of some or all directors where historically underrepresented ethnic and racial groups make up less than 40% or at least three members of the board (whichever is greater). We apply the same standards across all markets and oppose the election of some or all directors where women make up less than 40% or at least three members of the board (whichever is greater).</p>
<p>Investment</p>	<p><u>Goal:</u> Seek investments that help fill capital gaps affecting historically underserved communities, including Black, Indigenous and People of Color (BIPOC) communities.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to seek investments that help finance and promote a more just economy for BIPOC communities. Where data is available, we seek to evaluate relevant information related to diversity and systemic racism and its impacts on business models, leadership, and stakeholders to inform decision-making. ❖ Continue to seek useful, consistent, relevant metrics that help evaluate portfolio impact. ❖ Continue to communicate investment impact through regular public reporting, where data is available. ☑ Since 2000, Domini has sought fixed income investments that seek to support BIPOC communities through access to capital, creation of public goods, and filling capital gaps left by current financial practices.

	<p>Context and History: Since its launch in June 2000, the Domini Impact Bond Fund has sought investments that help build healthy vibrant communities by addressing three key goals: to increase access to capital for those historically underserved by the mainstream financial community, create public goods for those most in need, and fill capital gaps left by current financial practice. We acknowledge the history of our financial systems and economy, which has roots in exploitation, dispossession of land and resources, and discrimination. These structures have contributed to inequality, disparate access to resources and opportunities, and the racial wealth gap. We seek to support access to affordable and quality housing, health care, education, jobs, transportation, energy, water, the transition to a low-carbon future, financial services, and other critical resources. Through fixed-income investments, we believe we can contribute to the sustainability of communities and help foster economic opportunity for generations to come.</p> <p>Examples of holdings that have addressed capital gaps in BIPOC communities are included regularly in our quarterly and annual impact reports. For example this has included bonds issued by a Historically Black Colleges and University (HBCU), a social bond to address the economic and social challenges resulting from the COVID-19 pandemic, particularly among communities of color, who were disproportionately affected, and to address systemic issues exposed by the pandemic and the protests in response to police use of violence against persons of color.</p> <p>Domini has a long history of investing in community development financial institutions (CDFIs) that help improve economic opportunity in low-income communities by expanding access to capital. This also includes investment in companies and securities with a commitment to provide access to credit, financial services, housing financing, and opportunities to historically marginalized BIPOC communities.</p>
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“As an Investor” Assessment

We refer to the guidance laid out by the Investor Alliance for Human Rights in the “[Investor Toolkit on Human Rights](#).”⁴ As per the toolkit, it has “...a primary focus on investment activities, the Toolkit’s viewpoint is for equity ownership investments in both public and private companies, as well as both active and passive investment strategies.” With its investment-centric approach, we use it to report on our progress in our “As Investors” section of this report.

The following assessment is consistent with the “Toolkit Annex” included in the guide:

Tool #1: Checklist for policy commitment

Approved at the most senior level of the institution.

⁴ <https://investorsforhumanrights.org/sites/default/files/attachments/2020-05/Full%20Report-%20Investor%20Toolkit%20on%20Human%20Rights%20May%202020c.pdf>

- The Domini Standards Committee, which is comprised of Domini’s most senior-level environmental and social expertise, is responsible for the Domini Standards and engagement activities.
- ☑ *Informed by relevant expertise.*
 - Informed by human rights expertise on our staff.
 - Collaborated with external consultant.
- ☑ *Describes expectations of relationships.*
 - Expand our human rights expectations in Domini Impact Investment Standards.
 - Seek to center affected communities and look to those communities for guidance and leadership in engagements.
- ☑ *Communicate publicly and actively, internally and externally.*
 - Published on Domini website and share on social media.
 - Disseminated detailed Plan internally containing information such as responsible party, timeline and budget.
- ☑ *Embedded throughout the business, including within other policies and procedures.*
 - Plan covers Domini overarching standards, detailed key performance indicators used in investment selection and engagement to hold companies and issuers accountable.

Tool #2: Checklist for human rights governance

- ☑ *Approach is grounded in the institution’s policy commitment and embedded into governance systems.*
 - Policy commitment integrated into Domini Impact Investment Standards (see Tool #1 above).
- ☑ *Allocation of responsibility and accountability is assigned to specific functions.*
 - Domini’s internal documents specify parties responsible, timeline and budget.
- ☑ *Ultimate responsibility and accountability for implementation assigned to senior leadership.*
 - Senior Domini leaders developed our “As an Investor” actions and goals and will monitor progress annually.
- ☑ *Board of Directors has oversight of and receives regular updates on implementation of the policy commitment from senior management.*
 - Domini reports updates to our Domini Impact Investment Standards Committee and to the Domini Funds Board of Trustees.
- ☑ *Resources are allocated for implementation of commitment.*
 - Domini’s internal documents specify parties responsible, timeline and budget.
- ☑ *Capacity building takes place across all functions*
 - Domini’s senior staff provide training to research and engagement departments.
 - External training conducted as needed.
- ☑ *Clear procedures for selection, engagement, and oversight (e.g., portfolio companies).*
 - Domini’s Impact Investment Standards and Key Performance Indicators provide clear procedures for selection and Domini’s Annual Engagement plan provides specific actions.

Tool #3: Asset owner questions for asset managers

Not applicable as Domini Impact Investments is an asset manager.

Tool #4: Template company profile

- ☑ *Provide a summary of the company’s disclosed human rights policies and processes, as well as key gaps in the implementation of the corporate responsibility to respect human rights.*
 - Domini maintains a proprietary database to maintain all data collected on a company’s environmental and social performance as directed by its subindustry key performance indicators. Diversity is a universal Key Performance Indicator and additional metrics on systemic racism have been identified and integrated into the research training and process.

Additional Assessment tools:

- ☑ Use internal implementation matrix to implement and monitor the goals and actions of our Plan.

Section II. As a Business

Actions and Goals

As a business, Domini has always been committed to the value of Justice and Diversity. In fact, it is integral to creating a product that our investors want. Environmental and social research depends on having a diverse range of perspectives, experiences, identities, and points of view in assessing corporate impacts.

In accordance with this belief, we have adopted several policies and practices to increase diversity more intentionally on our team and foster a sense of inclusion and belonging. (Note: BIPOC refers to Black, Indigenous and people of color).

Hiring	<p><u>Goal:</u> Increase diverse representation and inclusion on Domini’s workforce and the investment community .</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to seek to interview a diverse pool of candidates for each job opening. ❖ Continue to disseminate job postings widely to promote the opportunity for diverse pool of candidates and new hires. ❖ Seek to establish relationships with Historically Black Colleges and Universities (HBCUs) and schools with economically and racially diverse student bodies to build relationships and foster a hiring pipeline. ❖ Continue to communicate commitment to being an equal opportunity employer in job postings. ❖ Maintain a list of trade associations and relevant hiring resources to help identify a diverse pool of employment candidates as such entities become known. ❖ Request voluntary self-reported demographic data from new hires to allow measurement of workforce diversity. ☑ In 2022, Domini designed a summer internship program to promote the field of finance and impact investing to try and reach an increased pool of economically and racially diverse candidates for the summer of 2023.
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- ☑ In the summer of 2023, Domini engaged four interns from diverse backgrounds for a six-week experiential learning opportunity designed to introduce students to the field of finance, promote professional development, and stimulate awareness of impact investing.
- ☑ In 2022, Domini engaged a BIPOC recruiter to enhance our pipeline to economically and racially diverse candidates and participated in the recruiter’s webinar to promote careers in finance and impact investing broadly across the recruiter’s candidate base.
- ☑ In 2022 and 2023, Domini successfully considered at least one diverse candidate for each position filled during each year.
- ☑ In 2022 and 2023, Domini representatives presented information related to impact investing and financial services to student populations at colleges and universities with economically and racially diverse student bodies.
- ☑ In 2023, Domini representatives initiated complementary admission to industry events for economically and racially diverse students.

Context and History: With an understanding of the advantages diversity, equity and inclusion brings, Domini’s team has historically had relatively strong racial and gender representation.

Domini’s employment policies and procedures have historically included a commitment to being an equal opportunity employer and treating all employees fairly without regard to age, ethnicity, physical disability, national origin, race, religion, sexual orientation, actual or perceived gender identity or expression (including the status of being transgender), or any other characteristic protected pursuant to applicable federal, state or local law. Domini also prohibits discrimination and harassment in the workplace and maintains a no retaliation policy for filing or cooperating with an investigation of such complaints.

Certain historical demographic data regarding Domini’s workforce composition is reflected below. It provides a glimpse of our efforts to drive an inclusive culture for all Domini team members.

Number of employees who consider themselves	2023*	5-year average**	10-year average**
Female	60.7%	59.8%	57.3%
Male	39.3%	40.2%	42.7%
BIPOC	14.3%	15.2%	15.4%
White	85.7%	84.8%	84.6%

*Based on employee survey responses for those employed as of 12/31/2023

**Estimated average for those employed as of each 12/31 for years ending prior to 2021

All demographic data from 12/31/2022 on is self-reported by our employees. As a relatively small organization, we are working with our team to ensure that any

	<p>demographic data we report externally helps to support our Plan goals and desire for transparency, while also protecting individual privacy.</p> <p>For this survey, we utilized EEO-1 categories for racial/ethnic self-identification and aggregated all such categories except White in our BIPOC result. While we recognize the limitations of these categories, we believe that reporting in this framework allows for the most comparability with the data broadly available for our industry.</p>
<p>Culture</p>	<p><u>Goal:</u> <i>Build a multi-cultural community</i> where everyone can thrive.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to conduct regular firmwide training on topics including diversity, equity, inclusion, anti-racism, systemic racism, belonging, bias, respect, etc. to build capacity and a shared understanding. ❖ Maintain voluntary employee demographic data regarding race, ethnicity, and gender to measure workforce diversity and update it annually. ❖ Continue to periodically conduct compensation study to assess pay equity. ❖ Continue to seek opportunities to recognize and celebrate diverse history, culture and influence and support other practices to strengthen inclusion and belonging. ❖ Continue to include support of the Plan in the development goals that impact enterprise compensation and levels for all team members. □ Organize project to highlight Domini’s art and memorabilia to celebrate diverse culture and arts, and provide information on how it was curated. ☑ In 2020, Domini added Juneteenth (June 19th) to our paid holiday calendar to recognize and celebrate the emancipation of those who had been enslaved in the United States. ☑ In 2021, Domini added Martin Luther King Jr. Day to our paid holiday calendar to celebrate BIPOC history, influence, and leadership. ☑ In 2021, Domini conducted a voluntary employee diversity survey regarding race/ethnicity to help measure its workforce diversity and updated its employment process to help ensure that survey results could be updated at least annually. ☑ In 2022, Domini staff members visited the Smithsonian National Museum of the American Indian to deepen the understanding and celebrate Indigenous cultures. We held an educational session and discussion on Indigenous Peoples, cultures, and history in relation to finance. ☑ In 2023, Domini hosted a Black History Month learning and discussion session for staff, focused on Black Wall Street and the 1921 Tulsa Race Massacre. <p><u>Context and History:</u> We recognize the benefits of a diverse work community that brings together people from different cultures and life experiences. We seek to foster a work environment that honors each person’s identity, fosters a sense of belong, and enables them to thrive. Part of this includes our work location. Domini’s office was intentionally</p>

	<p>decorated by our Founder and Chair, Amy Domini, with personally selected art and memorabilia from the southern hemisphere, including Asia and Africa, to celebrate cultural diversity and to serve as a reminder of our global community.</p>
<p>Procurement</p>	<p><u>Goal:</u> <i>Stimulate disclosure and transparency.</i></p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to engage new and existing suppliers, consultants and other business partners with significant business relationships on their Justice and Diversity policies, leadership, and impacts. □ Develop guidance on procurement to integrate considerations on Justice and Diversity into decision-making. ☑ In 2022, we developed a framework for requesting and reviewing Justice and Diversity reporting and practices that was incorporated into our annual due diligence and onboarding process for significant business partners. <p><u>Context and History:</u> In the past, Domini has relied on our in-house ESG research when doing business with publicly traded companies and, when possible, sought to engage with only those that were considered eligible for investment. Beginning in 2021, Domini began exploring ways to formalize requests and collection of racial diversity data from significant vendors with the goal of stimulating reporting and transparency in future years. In 2022 we developed a framework for requesting and reviewing racial diversity and justice policies with respect to significant vendors that was incorporated into our annual due diligence and onboarding process for such entities. Vendors that are subject to annual due diligence will also be asked to update their reporting annually going forward.</p>
<p>Communications</p>	<p><u>Goal:</u> <i>Reflect our commitment</i> to Justice and Diversity</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to implement best practices across all communication channels, including marketing, such as: <ul style="list-style-type: none"> ○ Use of respectful and appropriate language and imagery. ○ Require inquiry on BIPOC and gender representation prior to Domini participation on all conference panels. ○ Seeking representation of at least one BIPOC representative for Domini organized events such as conferences and webinars. ○ Require inquiry on BIPOC and gender representation on speaking panels for Domini sponsorship of conferences. ☑ In 2022, Domini implemented guidelines firmwide to be utilized across all communication channels, including marketing, to help ensure compliance with best practices for use of respectful and appropriate language and imagery.

	<p><u>Context and History:</u> Domini has informally reviewed materials with a lens of racial and ethnic sensitivity and sought to use imagery that is culturally diverse. In 2021 Domini, began formally training its staff about the Plan annually and upon hiring. This training covers each employee’s obligation to consider BIPOC representation with respect to panels for all Domini- and non-Domini-related events. In 2022, Domini also implemented written guidelines applicable to the firm communications to help ensure compliance with best practices for the use of respectful and appropriate language and imagery.</p>
<p>Implementation</p>	<p><u>Goal:</u> Ensure we are taking steps to implement each component of the Plan to help detect and prevent systemic biases and fulfill our commitment to Justice and Diversity.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> ❖ Continue to maintain implementation matrix with timeline to monitor the goals and actions of our Plan. ☑ In 2022, Domini created an implementation matrix with timelines to implement and monitor the goals and actions of our Plan.

“As a Business” Assessment

For our “As a Business” section, we again turn to the “Investor Toolkit for Human Rights.” We use relevant items of tools #1 and #2, which are related to policy and governance, to assess our Plan and actions.

Tool #1: Checklist for our internal policy commitment

- ☑ *Approved at the most senior level of the institution.*
 - Our “As a Business” Goals and Actions have been approved by our most senior executives.
- ☑ *Informed by relevant expertise.*
 - Informed by human resources and human rights expertise on our staff.
 - Worked with external consultant.
- ☑ *Describes expectations of relationships.*
 - Our “As a Business” Goals and Actions provide clear, concrete description of expectations
- ☑ *Communicate publicly and actively, internally and externally.*
 - Published on Domini website and share on social media.
 - Disseminated detailed Plan internally containing information such as responsible party, timeline and budget.
- ☐ *Embedded throughout the business, including within other policies and procedures.*
 - ☑ To be integrated into Domini’s written procedures and training schedule.
 - Domini procurement guide to be created.

- On an ongoing basis, provide periodic staff training regarding Plan Goals and Actions.

Tool #2: Checklist for our internal human rights governance

- Approach is grounded in the institution's policy commitment and embedded into governance systems.*
 - Policy commitment integrated into Plan (see Introduction and Tool #1 above).
- Allocation of responsibility and accountability is assigned to specific functions.*
 - Domini's internal documents specify parties responsible, timeline and budget.
- Ultimate responsibility and accountability for implementation assigned to senior leadership.*
 - Senior Domini leaders developed our "As a Business" Goals and Actions and will monitor progress bi-annually.
- Board of Directors has oversight of and receives regular updates on implementation of the policy commitment from senior management.*
 - The Managers of Domini's limited liability company have participated and overseen the development of our "As a Business" Plan and will receive regular updates.
- Resources are allocated for implementation of commitment.*
 - Domini's internal Plan documents specify parties responsible, timeline and budget.
- Capacity building takes place across all functions*
 - Domini will conduct firmwide training and seek additional training where needed,
- Clear procedures for selection, engagement, oversight, and review of all business partners (e.g., consultants and other service providers).*
 - Domini senior staff is responsible for developing a plan for engagement and procurement standards to integrate into all business relationships where it is not yet in place.

Additional Assessment tools:

- Use implementation matrix to implement and monitor the goals and actions of our Plan.