

# ENGAGEMENT REPORT

Philadelphia Gas Works Pension Plan

MSCI ESG Research LLC

**August 2018**

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In January 2018, MSCI ESG Research once again sent out letters on behalf of the City of Philadelphia Board of Pensions & Retirement requesting the companies in the covered company list to sign the Sandy Hook Principles. One month after initial engagement, companies will be sent a reminder to review said letter. Results from engagement efforts are detailed later in this document.

This document includes three sections: (i) Letter template sent to companies in the Covered Company List; (ii) Company narratives for companies in the covered company list, detailing their firearms involvement; and (iii) Response summary, for those companies who have replied to the letter. As a reference, a covered company list, a compliant list, and a non-compliant list will be provided in an Excel document for your convenience.

## ENGAGEMENT LETTER TEMPLATE

<<Month day, year>>

Dear Investor Relations:

The City of Philadelphia Board of Pensions & Retirement (the “Board”) has retained MSCI ESG Research to assist it in implementing the enclosed resolution (the “Resolution”) establishing the Sandy Hook Principles (the “Principles”), which the Board unanimously adopted on January 24, 2013. The Resolution states that the Principles are in remembrance of those who lost their lives in the shooting massacre on December 14, 2012 at Sandy Hook Elementary School and in remembrance of others who have lost their lives to gun violence. The Resolution further indicates that the Principles are designed to encourage positive corporate behavior by gun and ammunition manufacturers, distributors and retailers by establishing a baseline standard for responsible conduct and business practices to help ensure maximum safety to our citizens.

The Resolution prohibits the Board from being invested in any Covered Company (as defined in the Resolution) which has not adopted the Principles<sup>1</sup>. The Resolution sets forth an engagement process with Covered Companies pursuant to which such companies are encouraged to sign and abide by the Principles. Should a Covered Company decline to sign and abide by the Principles, then the Board will be prohibited from investing in, and will commence divesting itself of investments in such company.

In collaboration with the Board, MSCI ESG Research has identified your company as a Covered Company and placed it on a Covered Companies List. The identification is based on publicly available sources and is presented in the information box at the end of this letter. In accordance with the Resolution, the Board offers your company the opportunity to clarify its gun and/or ammunition-related activities and encourages you to take one of the following actions within 90 days of the date of this letter: (1) If you believe your company is not a Covered Company, please provide a written explanation to that effect; or (2) If you are a Covered Company, then the Board encourages a company representative with authority to bind the company to sign and return to MSCI ESG Research the enclosed copy of the Principles.

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<sup>1</sup> Unless otherwise defined in this letter, all capitalized terms used herein are defined in the Resolution. “Covered Companies” include companies which manufacture, distribute or sell at retail any guns or ammunition (including certain component parts manufacturers), except to the extent the activities are for a law enforcement or military purpose.

MSCI ESG Research will review the information you provide regarding your compliance with the Resolution and may contact you with additional questions. We ask that you provide a point of contact at your firm for future correspondence.

Based on your company's response, the Board will take one of the following actions:

If the Board determines based on your response that your company is not a Covered Company, then the Board will remove your company from the Covered Companies List and no further action will be taken.

If your company is a Covered Company and signs and agrees to abide by the Principles, then your company will be placed on a Compliant Companies List and no further action will be taken, provided it remains in compliance with the Principles.

If your company is a Covered Company and declines to sign and abide by the Principles, then your company will be placed on a Non-Compliant Companies List. The Board will be prohibited from investing in your company and will commence a process of divesting itself of all current investments in your company. Your company will remain ineligible for investment by the Board unless and until your company signs the Principles.

We look forward to your response within 90 days of the date of this letter. Please do not hesitate to contact me if you have questions.

Sincerely,

Joseph I. Williams  
Content Manager, Business Involvement Screening Research, MSCI ESG Research

Joe Yamut  
Research Lead, Business Involvement Screening Research, MSCI ESG Research

Enclosures: Philadelphia Board of Pensions and Retirement Resolution: Sandy Hook Principles

*Profile*

*<<Company's firearms profile>>*

## COMPANY NARRATIVES

The following companies are included in the City of Philadelphia Board of Pensions & Retirement covered company list:

### AMERICAN OUTDOOR BRANDS CORPORATION

Ticker	AOBC
CUSIP	02874P103
ISIN	US02874P1030
SEDOL	BD8ZGK9
Country of Domicile	US
Profile	<p>American Outdoor Brands (formerly Smith &amp; Wesson Holding), through its wholly owned subsidiaries Smith &amp; Wesson Corp. and Thompson/Center Arms Co. Inc., manufactures and exports revolvers, hand guns, modern sporting rifles with semi-automatic models, and hunting firearms for hunting, sports, and personal protection applications.</p> <p>In December 2016, the company changed its name to American Outdoor Brands.</p> <p>In FY 2014, the company ended its agreement with Carl Walther GmbH to manufacture Walther firearms. In FY 2015, the company also ended its exclusive import and distribution agreement for Walther firearms. Carl Walther continues to manufacture Smith &amp; Wesson's M&amp;P 22 pistols until the end of fiscal 2017.</p>

### BIG 5 SPORTING GOODS CORPORATION

Ticker	BGFV
CUSIP	08915P101
ISIN	US08915P1012
SEDOL	2958646
Country of Domicile	US
Profile	<p>Big 5 Sporting Goods retails semi-automatic shotguns, rifles, and ammunition for hunting. Its brands include Beretta, Colt, Mossberg, Ruger, Savage Arms, and Winchester.</p>

### CABELA'S INCORPORATED

Ticker	BSGRP
CUSIP	
ISIN	
SEDOL	
Country of Domicile	US
Profile	<p>Cabela's retails semi-automatic rifles and pistols, revolvers, handguns, shotguns, and ammunition for hunting and sport shooting. Its brands include Beretta, Bushmaster, Remington, Savage Arms, and Sig Sauer.</p> <p>In September 2017, the company was completely acquired by Bass Pro Shop.</p>

### CAMPING WORLD HOLDINGS, INC.

Ticker	CWH
CUSIP	13462K109
ISIN	US13462K1097
SEDOL	BDCBXH9
Country of Domicile	US
Profile	<p>Camping World retails and distributes firearms such as handguns, shotguns, and rifles through its subsidiary, Gander Outdoors.</p> <p>In May 2017, Camping World acquired Gander Outdoors (formerly known as Gander Mountain) through a bankruptcy auction.</p>

### CLARUS CORPORATION

Ticker	CLAR
CUSIP	18270P109
ISIN	US18270P1093
SEDOL	BF5QHG2
Country of Domicile	US
Profile	<p>Clarus through its wholly owned subsidiary, Sierra Bullets produces and sells bullets for hand guns, and rifles.</p>

## COLT DEFENSE LLC

Ticker	COESE
CUSIP	
ISIN	
SEDOL	
Country of Domicile	US
Profile	<p>Colt Defense develops and manufactures firearms, such as pistols, revolvers, carbines, and semi-automatic rifles used in sporting and hunting applications. Its products are sold to the commercial market through Colt's Manufacturing Co. LLC.</p> <p>In July 2013, the company acquired New Colt Holding Corp., the parent company of Colt's Manufacturing, which manufactures firearms for the civilian and sporting markets. The merger resulted to a single company developing, manufacturing, and selling firearms under the brand Colt for all markets and applications.</p> <p>In June 2013, Colt's Manufacturing entered into a partnership with Black Hills Ammunition, to manufacture and sell ammunition for competition rifles.</p> <p>In June 2015, Cold Defense filed for a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code in the United States Bankruptcy Court. In January 2016, the company completed its reorganization but also filed a suspension of duty to report. The company last reported revenue figures for FY 2013.</p>

## COMPAGNIE FINANCIERE RICHEMONT SA

Ticker	CFR
CUSIP	204319107
ISIN	CH0210483332
SEDOL	BCRWZ18

Country of Domicile	CH
Profile	<p>Compagnie Financiere Richemont, through its wholly-owned subsidiary James Purdey &amp; Sons, manufactures game guns, over &amp; under guns, hammer guns, double rifles, bolt action rifles, and cartridges for sport shooting.</p> <p>In April 2017, the company informed MSCI ESG Research that the sale of their rifles account for less than 0.05 percent of the company's sales and represent less than 150 units a year.</p>

### DAICEL CORPORATION

Ticker	4202
CUSIP	
ISIN	JP3485800001
SEDOL	6250542
Country of Domicile	JP
Profile	<p>Daicel (formerly Daicel Chemical Industries Ltd.) manufactures shotgun cartridges or shotgun shells for hunting and trapshooting.</p> <p>In February 2017, Daicel told MSCI ESG Research that its subsidiary, Daicel Pyrotechnics Ltd., is still producing and selling ammunition for hunting and clay shooting. The company also disclosed that its products are only for the Japanese domestic market, which is why ammunition sales represent only less than 0.10 percent of its consolidated net sales.</p>

### DICK'S SPORTING GOODS, INC.

Ticker	DKS
CUSIP	253393102
ISIN	US2533931026
SEDOL	2969637
Country of Domicile	US
Profile	<p>Dick's Sporting Goods retails semi-automatic rifles, shotguns, and ammunition for hunting and target shooting. Its brands include Beretta, Browning, Mossberg, Remington, and Savage</p>

Arms.

### FORJAS TAURUS S.A.

Ticker	FJTA3
CUSIP	
ISIN	BRFJTAACNOR5
SEDOL	B010W80
Country of Domicile	BR
Profile	Forjas Taurus manufactures, exports, and sells revolvers, handguns, rifles, pistols, shotguns, and ammunition for civilian use. The company also distributes semi-automatic rifles and pistols from the Diamondback brand, through its wholly owned subsidiary Taurus Holdings Inc.

### HECKLER & KOCH GMBH

Ticker	
CUSIP	
ISIN	XS1649057640
SEDOL	
Country of Domicile	DE
Profile	Heckler & Koch manufactures and sells pistols and rifles for civilian use.

### HOWA MACHINERY, LTD.

Ticker	6203
CUSIP	
ISIN	JP3840600005
SEDOL	6441283
Country of Domicile	JP
Profile	Howa Machinery manufactures the M1500 bolt action rifle for hunting. The company also exports and sells its products to the United States.

### IZHEVSKIY MASHZAVOD OAO

Ticker	ROSTE
CUSIP	
ISIN	
SEDOL	
Country of Domicile	RU
Profile	Kalashnikov Concern (formerly known as Izhevskiy mashzavod, Izhevskiy mashinostroitel'niy zavod, or Izhmash) manufactures semi-automatic rifles and semi-automatic shotguns for hunting and sports shooting.

### MIROKU CORPORATION

Ticker	7983
CUSIP	
ISIN	JP3910800006
SEDOL	6596354
Country of Domicile	JP
Profile	Miroku manufactures shotguns, rifles and ammunition for hunting and sporting applications. Its products include brands such as Browning, B.C. Miroku, and Winchester.

### NOF CORPORATION

Ticker	4403
CUSIP	
ISIN	JP3753400005
SEDOL	6640488
Country of Domicile	JP
Profile	NOF, through its subsidiary Nippo Kogyo Co. Ltd., manufactures gun ammunition for hunting and sporting rifles.

As of March 2017, the company owned 93.5 percent of Nippo Kogyo.

### NORTHROP GRUMMAN CORPORATION

Ticker	NOC
CUSIP	666807102
ISIN	US6668071029
SEDOL	2648806
Country of Domicile	US
Profile	Northrop Grumman through its wholly-owned subsidiary, Northrop Grumman Innovation Systems (formerly Orbital ATK.), develops and manufactures ammunition and cartridges for pistols, rifles, shotguns, and handguns, used in sporting and hunting applications.

### NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.

Ticker	AD9S
CUSIP	68557N103
ISIN	US68557N1037
SEDOL	BVWY2K0
Country of Domicile	US
Profile	<p>Northrop Grumman Innovation Systems (formerly Orbital ATK.) develops and manufactures ammunition and cartridges for pistols, rifles, shotguns, and handguns, used in sporting and hunting applications.</p> <p>In June 2018, the company was acquired by Northrop Grumman.</p> <p>In February 2015, Alliant Techsystems completed its merger with Orbital Sciences Corp. The combined company was renamed Orbital ATK. Vista Outdoor was formed when Orbital ATK spun off its firearms manufacturing business. Orbital ATK, however, will supply Vista Outdoor with ammunition products as part of a continuing agreement between the two companies.</p>

### OLIN CORPORATION

Ticker	OLN
CUSIP	680665205

ISIN	US6806652052
SEDOL	2658526
Country of Domicile	US
Profile	Olin, through its wholly owned subsidiary Winchester Ammunition Inc., produces sporting ammunition for rifles, shotguns, and handguns, as well as industrial cartridges for hunting and recreational applications. It also distributes and retails firearms and ammunition through its wholly owned subsidiary, Winchester Australia Ltd. The company's products include brands such as Winchester, Browning, CZ, Stey-Mannlicher, and Lanber.

### POONGSAN CORPORATION

Ticker	103140
CUSIP	
ISIN	KR7103140000
SEDOL	B3BDFS1
Country of Domicile	KR
Profile	Poongsan manufactures ammunition for pistols, revolvers, and rifles used for recreational hunting and shooting. Its products are sold under the Precision Made Cartridges brand.

### POONGSAN HOLDINGS CORPORATION

Ticker	005810
CUSIP	
ISIN	KR7005810007
SEDOL	6694474
Country of Domicile	KR
Profile	<p>Poongsan Holdings, through its minority ownership of Poongsan Corp. (Poongsan), manufactures ammunition for pistols, revolvers, and rifles used for recreational hunting and shooting. Poongsan's products are sold under the Precision Made Cartridges brand.</p> <p>As of December 2016, the company owned 35.08 percent of</p>

Poongsan.

### REMINGTON ARMS COMPANY, INC.

Ticker	REMIG
CUSIP	
ISIN	
SEDOL	
Country of Domicile	US
Profile	Remington Arms manufactures semi-automatic rifles such as the R-15. It also manufactures handguns, carbines, and shotguns for sporting applications. The company also manufactures its own ammunition in various calibers.

### S&T CORPORATION

Ticker	100840
CUSIP	
ISIN	KR7100840008
SEDOL	B2PDGC1
Country of Domicile	KR
Profile	<p>S&amp;T Corp is a majority owned subsidiary of S&amp;T Motiv. S&amp;T Motiv manufactures the DP-51 and DP-51C civilian variants of the K5 pistol.</p> <p>As of December 2016, S&amp;T Motiv owned 52.92 percent of S&amp;T Corp.</p>

### S&T HOLDINGS CO. LTD.

Ticker	036530
CUSIP	
ISIN	KR7036530004
SEDOL	6223328

Country of Domicile	KR
Profile	<p>S&amp;T Holdings, through its ownership of S&amp;T Motiv Co. Ltd., manufactures civilian variants of the K5 semi-automatic pistol.</p> <p>As of December 2016, the company owned 37.21 percent of S&amp;T Motiv.</p>

### S&T MOTIV CO., LTD

Ticker	064960
CUSIP	
ISIN	KR7064960008
SEDOL	6515434
Country of Domicile	KR
Profile	S&T Motiv manufactures the DP-51 and DP-51C civilian variants of the K5 pistol.

### SIG SAUER INC.

Ticker	SIGSR
CUSIP	
ISIN	
SEDOL	
Country of Domicile	US
Profile	Sig Sauer manufactures semi-automatic pistols and rifles for sporting and collection purposes. The company also manufactures ammunition.

### SPORTSMAN'S WAREHOUSE HOLDINGS, INC.

Ticker	SPWH
CUSIP	84920Y106
ISIN	US84920Y1064
SEDOL	BLM7DY0
Country of Domicile	US
Profile	Sportsman's Warehouse retails semi-automatic rifles and pistols, revolvers, handguns, shotguns, and ammunition for hunting and sport shooting. Its brands include Remington, Smith and Wesson, Ruger, and Browning.

### STURM, RUGER & COMPANY, INC.

Ticker	RGR
CUSIP	864159108
ISIN	US8641591081
SEDOL	2856289
Country of Domicile	US
Profile	<p>Sturm, Ruger &amp; Co. designs and manufactures firearms, such as semi-automatic rifles, shotguns, pistols, and revolvers for personal, hunting, and sports applications. It sells its firearms under the Ruger brand.</p>

### THE KROGER CO.

Ticker	KR
CUSIP	501044101
ISIN	US5010441013
SEDOL	2497406
Country of Domicile	US
Profile	<p>Kroger, through its wholly-owned subsidiary Fred Meyer, sells and retails semi-automatic rifles, pistols, and cartridge ammunition for hunting. Its brands include Glock and Remington.</p> <p>In March 2018, Kroger announced that its Fred Meyer division is working to phase out sales of firearms and ammunition.</p>

### TUL'SKIY ORUZHEYNYI ZAVOD PAO

Ticker	tozz
CUSIP	
ISIN	RU0007661203
SEDOL	4878225

Country of Domicile	RU
Profile	Tul'skiy oruzheynyi zavod, also known as the Tula Small Arms Plant, manufactures and sells hunting rifles, shotguns, and carbines for the civilian market.

### VERNEY CARRON SA

Ticker	MLVER
CUSIP	
ISIN	FR0006174496
SEDOL	5346505
Country of Domicile	FR
Profile	<p>Verney Carron manufactures and sells hunting rifles, shotguns, and other sporting guns. Its products include over-and-under shotguns, over-and-under rifles, bolt-action rifles, and custom-made hunting guns.</p> <p>In June 2013, the company informed MSCI ESG Research that it does not manufacture ammunition. It further clarified that Verney Carron-branded ammunition for hunters is marketed by a company called S.A.P.A. These are non-lethal, flashball and gas-cloud ammunition, and are therefore excluded from MSCI ESG Research's scope.</p>

### VISTA OUTDOOR INC.

Ticker	VSTO
CUSIP	928377100
ISIN	US9283771007
SEDOL	BVGC697
Country of Domicile	US
Profile	<p>Vista Outdoor produces rifles and shotguns for sporting and hunting applications, and retails ammunition. In addition, the company produces semi-automatic rifles under its Savage MSR product line.</p> <p>In February 2015, Vista Outdoor was formed when Orbital ATK Inc. (formerly Alliant Techsystems) spun-off its firearms manufacturing business. Orbital ATK, however, will supply Vista Outdoor with ammunition products as part of a continuing</p>

agreement between the two companies.

### WAL-MART DE MEXICO, S.A.B. DE C.V.

Ticker	WALMEX*
CUSIP	93114W107
ISIN	MX01WA000038
SEDOL	BW1YVH8
Country of Domicile	MX
Profile	<p>Wal-Mart de Mexico is a majority-owned subsidiary of Walmart. Wal-Mart Stores retails semi-automatic rifles, shotguns, pistols, and ammunition for hunting and sports shooting.</p> <p>As of January 2017, Walmart owns 71 percent of Wal-Mart de Mexico.</p>

### WALMART INC.

Ticker	WMT
CUSIP	931142103
ISIN	US9311421039
SEDOL	2936921
Country of Domicile	US
Profile	<p>Walmart (formerly Wal-Mart Stores) retails semi-automatic rifles, shotguns, pistols, and ammunition for hunting and sports shooting. Some of the brands it sells include CCI, Federal Ammunition, Mossberg, Remington, Savage Arms, and Winchester.</p>

### XXL ASA

Ticker	XXL
CUSIP	98386J106
ISIN	NO0010716863
SEDOL	BQZHXB9
Country of Domicile	NO
Profile	<p>XXL retails rifles and ammunition for hunting. Its brands include Heym, Tikka, and Weatherby.</p>

## COMPANY RESPONSES

MSCI ESG Research has received ten definitive replies to the engagement letters since the survey began. Compagnie Financiere Richemont SA, Dicks Sporting Goods, IMI PLC, Izhevskiy Mashzavod OAO, NOF Corporation, Verney-Carron SA, Walmart Inc, Xtek Ltd, and XXL ASA responded but did not sign the Sandy Hook Principles. Daicel Corporation has signed the Sandy Hook Principles in 2014 and has provided responses to the annual engagement survey.

In August 2018, Northrop Grumman Corporation was added to the Covered Company list. In June 2018, the company acquired Northrop Grumman Innovation Systems (formerly Orbital ATK), which develops and manufactures ammunition and cartridges for pistols, rifles, shotguns, and handguns that are used in sporting and hunting applications.

In August 2018, Xtek Ltd was removed from the Covered Company list. In May 2018, Xtek informed MSCI ESG Research that the company no longer retails firearms to civilians but only serves defense and law enforcement agencies within Australia, New Zealand, and the U.S.

In October 2016, Izhevskiy Mashzavod Oao was removed from the Covered Company list since the company is no longer part of MSCI ESG Research coverage. In January 2018, as a result of a methodology review, the company was added back to the Covered Company list.

In May 2015, Vista Outdoor Inc. was added to the Covered Company list when Orbital ATK Inc. (formerly Alliant Techsystems) spun-off its firearms manufacturing business.

In May 2015, Metalico, Inc. is no longer a covered company after it sold its lead fabricating segment, which manufactures lead shots for recreational shooting.

In February 2015, IMI plc was removed from the Covered Company list after it clarified that it had sold its Eley business, which manufactures sporting ammunition.

Summaries of company responses are detailed below.

**COMPAGNIE FINANCIERE RICHEMONT SA**

Compliant: No  
 Contact: Catherine Tek

On February 28, 2018, and April 06, 2017, Ms. Catherine Tek replied to the annual engagement request and on January 20, 2016, January 26, 2015 and January 10, 2014, Ms. Isabelle Janin replied to the annual engagement request on behalf of Ms. Sophie Cagnard. As per their response, their position remains the same as it was in August 2013.

On August 27, 2013 Compagnie Financiere Richemont SA declined to sign the Sandy Hook Principles.

Ms. Cagnard explained that the sale of their rifles account for less than 0.05% of the company’s sales and represent less than 150 units a year. All of these sales are generated by a single store located in London, Maison Purdey. Maison Purdey does not wholesale its rifles. Due to this situation the company is not able to sign the Sandy Hook Principles.

The company highlighted that Mr. Gary Saage, Richemont’s CEO, supports the efforts of the Philadelphia Board of Pensions & Retirement. Both Mr. Saage and his children attended the Sandy Hook Elementary School.

In the company’s February 2018 response, the sale of their rifles account for less than 0.05% of Richemont sales, which represents 51 new units in the 2017 fiscal year.

**DAICEL CORPORATION**

Compliant: Yes  
 Contact: Masahiro Hirokawa

On February 10, 2017 and April 18, 2018, Mr. Masahiro Hirokawa responded to the annual engagement requests. He noted that he was advised that they no longer need to submit and sign the Sandy Hook principles again since it was already signed in 2014. The company responded to the annual compliance survey sent in January 2018.

On March 4, 2016, Ms. Xue Yang responded to the annual engagement request on behalf of Mr. Hirokawa. She said that she was advised that they no longer need to submit and sign the Sandy Hook principles again since it was already signed in 2014. The company responded to the annual compliance survey sent in January 2016.

In Daicel’s 2017 and 2016 survey responses, the company mentioned that Japan Shotshell Ltd., the subsidiary that manufactures ammunition, changed its name to Daicel Pyrotechnics

Ltd. in October 2014. Daicel Pyrotechnics is in charge of the company's firearms and ammunition business but has restricted its sale only within Japan and strictly complies with Japan's "Act for Controlling the Possession of Firearms or Swords and Other Such Weapons" and "Explosives Control Act", which severely restrict possession and use of firearms and ammunitions, only to distributors located in Japan and having a legitimate license to sell the products. The company also said that an assessment by Japan's National Police Agency is required to obtain the certificate of receipt for gun and ammunition. Daicel and its distributors only sell its products to persons with this certificate.

Further, the company clarified that it does not manufacture any military style assault weapons for use by civilians. Daicel is a member of Japan Explosives Safety Association, which ensures the promotion of safety measures for guns and ammunition. Since the company only sells its products within Japan, Daicel mentioned that it cannot take part in efforts to strengthen legislative restrictions on guns in the United States. The company also added that it keeps track of the actual results of the manufacture and sale of their products and make periodic reports to the relevant administrative authorities in Japan. Daicel also noted that it regularly holds an exchange meeting with the distributors selling their products and exchange information with such distributors on the sale and handling of those products.

On February 26, 2014, Mr. Masahiko Hirokawa, on behalf of the company, signed the Sandy Hook principles. The signed document was sent along with a previous report. In his 2014 reply, Mr. Hirokawa described the procedures implemented by the company in relation to the sale and manufacture of their products. These measures involve restricting sales to include only to those distributors located in Japan and checking whether individual buyers possess valid certificates of receipt for explosives issued by the National Police Agency.

While Mr. Hirokawa clarified that they cannot take part in efforts to strengthen firearms restrictions in the United States on account of their operations being limited only to the Japanese domestic market, he affirmed the company's commitment to promote background checks, firearms safety awareness, and transparency in disclosing firearms sales data to relevant authorities.

**DICK'S SPORTING GOODS, INC.**

Compliant: No  
 Contact: John Hayes III

On January 20, 2017, January 26, 2016 and January 26, 2015, Mr. John Hayes III responded to the annual engagement requests. He stated that as of those times, the company is not prepared to adopt the Sandy Hook Principles, but they will continue to monitor federal, state and local regulations regarding the sale and transfer of firearms and ammunition.

**IZHEVSKIY MASHZAVOD OAO**

Compliant: No  
 Contact: Jay Portz

Izhevskiy Mashzavod Oao was previously removed from the Covered Company list since the company is no longer part of MSCI ESG Research coverage. However, in January 2018, as a result of a methodology review, the company was added back to the Covered Company list.

Mr. Jay Portz from RWC Group LLC contacted MSCI ESG Research on behalf of Izhevskiy mashzavod OAO, also known as Izhmash and declined to sign the Sandy Hook Principles.

Izhevskiy mashzavod OAO is fully owned by a single shareholder and therefore considers it will remain unaffected by any action the City of Philadelphia Board of Pensions & Retirement will take if it does not sign the Sandy Hook Principles. The company states, "Izhmash is in compliance with all firearm laws and regulations. Safe and responsible firearm use is always Izhmash's and our goal."

**NOF CORPORATION**

Compliant: No  
 Contact: Not provided

In January 2018 and February 2016, NOF Corporation requested to be removed from the covered company list.

In January 2018 and February 2016, the company told MSCI ESG Research that Nippo Kogyo Co. Ltd., a subsidiary of NOF Corporation, manufactures ammunition for hunting and sporting rifles and sells hunting rifles. Nippo Kogyo Co. Ltd. is compliant with the Swords and Firearms Control law in Japan. Nippo Kogyo Co. Ltd. does not export to other countries and limits its sales to Japan. For this reason, NOF Corporation believes they should be removed from the Covered Company list.

## VERNEY CARRON SA

Compliant: No  
 Contact: Jean Verney-Carron

On January 14, 2016, January 24, 2015 and January 8, 2014, Verney-Carron responded to the annual engagement request. Mr. Verney-Carron stated that there are no changes in their reply since July 2013. Mr. Verney-Carron requested to stop receiving these requests.

In June 2013, Verney-Carron SA declined to sign the Sandy Hook Principles followed by a confirmation of this decision on July 2013. The company considers the principles are not applicable to them as a non-US company. On July 2013, MSCI ESG Research had clarified to the company that these principles are not exclusive to US based companies.

Verney-Carron SA explained it is a small family owned company that does not seek investment. They also expressed to be “shocked” whenever a shooting rampage occurs in the United States, but do not believe their company is in any way responsible for them, nor that it will be in the future. Verney-Carron SA states “gun laws” in France are more restrictive than in the US, and that they believe the US importer abides by local laws. The company makes special emphasis in two remarks:

1. Verney-Carron SA does not seek any investment from external entities.
2. They believe the principles are written for US based companies.

## WALMART INC

Compliant: No  
 Contact: Katherine Neebe

On April 20, 2018, Walmart Inc responded to the annual engagement request. Ms. Katherine Neebe noted that while the company is not a signatory to the Sandy Hook Principles, Walmart takes seriously its obligation to sell firearms and ammunitions in a responsible way. While the law allows the sale of a firearm if no response to a background check request has been received within three business days, the company requires such approval before a purchase. The company also have processes in place for hand gun ammunition to be locked up and inaccessible to customers without associate intervention. All ammunition sales also require identification and age verification.

The company also noted that Walmart announced its decision to place an age restriction for the sales of firearms and ammunitions to individuals over the age of 21 in February 2018. The company also removed items from its website resembling assault-style rifles including

non-lethal airsoft guns and toys. Walmart further stated that it has not sold AR-15 style firearms since 2015 and that it does not sell any AR-15 accessory, including bump stocks and high-capacity magazines. These products were also listed on its prohibited items list for online marketplace sellers.

Walmart also developed software designed to prevent sales where a person who is legally entitled to purchase a firearm attempts to purchase for a person who cannot legally obtain a firearm for themselves. The company is also a charter member and the first retailer to join Mayor Bloomberg’s coalition against illegal guns in 2008 and adopted the 10-point code established by the Responsible Firearms Retailer Partnership that goes beyond what the law requires.

**XXL ASA**

Compliant: No  
 Contact: Tolle Groterud

In April 2017 and April 2018, Mr. Tolle Groterud responded to the annual engagement request. He stated that XXL ASA is a Norway-based sporting goods retailer that sells its goods in Norway, Sweden, Finland, and Denmark. The company does not have US operations. Mr. Groterud noted that the company does not have handheld weapons, guns or revolvers, military weapons or equipment for practical shooting and that the company’s profile is directed towards outdoor life, wilderness, and hunting. He also noted that the company monitors the sale and storage of weapons, ammunitions, and fireworks closely. An approval from police authorities is required prior to the purchase of weapons. The company also makes its own considerations and assessments of suitability in each case.

Mr. Groterud noted that the laws and regulations regarding firearms are highly uniform in Norway, Sweden, Finland, and Denmark. In Norway, the “Norwegian Firearms Acts of 9 September 1961 no.1” governs the sale of weapons, as well as parts and ammunition for weapons. Among other requirements, XXL is required to have individual licenses to sell firearms for all stores in which firearms and ammunitions are sold. Relevant legislation in the aforementioned countries also regulates stores selling their products, including specific requirements for firearms sales personnel, storage of weapons and ammunition, use of alarm system, and other requirements to prevent theft, fires, and explosions.

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