



CONCAP
ADVISORY

ConCap® Conscious Investing Policy

At ConCap®, we implement a Conscious Investing Policy. Our desire to maximize our clients' returns for their individual risk profile cannot come at the detriment of the environment or material social costs. As a result, we have placed certain individual companies and industries on our company's blacklist. These companies have demonstrated a disregard for their ethical treatment of the environment, their consumers, or their employees. By no means, do we consider this list comprehensive and each company/industry is reviewed periodically and is listed or removed from our blacklist at ConCap®'s discretion.

Therefore, individual equities on our black list will not be purchased for clients' accounts at ConCap®, although clients may choose to invest in them on their own outside of ConCap®. Given the increasingly integrated environment of the market, we cannot guarantee that the companies on our blacklist are not held in various financial instruments that we purchase for our clients, but greater consideration will be given to funds that mitigate such exposures as much as possible.

We consider and subsequently incorporate into our investment decisions, including but not limited to, the following factors:

Climate Change and Social Harm

We have blacklisted companies that produce products that are damaging to consumers. This includes the tobacco industry and weapons manufacturers. We believe it is not only good common sense for our clients to avoid in companies whose products are harmful for people and the environment and in some cases are literally killing people, but we furthermore believe it to be morally reprehensible to do so.

In addition, we recognize that climate change is a pivotal issue that serves as a potentially existential threat to our entire planet and its inhabitants. We have therefore blacklisted investment in fossil fuels, which includes all companies in the oil, gas, and coal industries. These three industries alone account for 75% of all greenhouse gases and 90% of all carbon dioxide emissions.

Please see the appendix below for a comprehensive list.

Ethical Corporate Governance

Without sound governance among companies, we believe that we cannot have a sustainable, vibrant, and healthy marketplace. We have therefore blacklisted investment in companies that have had major lapses in their corporate governance and companies that have willfully participated in unethical business practices.

Please see the appendix below for a comprehensive list.

Appendix

Blacklisted firms include, the following publicly-traded companies in the **tobacco industry**:

Name	Ticker
Philip Morris	PM
Altria Group	MO
British American Tobacco	BTI

Blacklisted firms include, the following publicly-traded companies in the **weapons manufacturing industry**:

Name	Ticker
Smith & Wesson	SWBI
Strum, Ruber & Co.	RGR
Vista Outdoor	VSTO
Ammo Inc.	POWW
Outdoor Brands	AOUT
Lockheed Martin	LMT
Northrop Grumman	NOC
General Dynamics	GD
Raytheon Technologies	RTX

Blacklisted firms include, the following publicly-traded companies in the **fossil fuels industry**:

Name	Ticker
Exxon Mobil	XOM
Chevron	CVX
Shell	SHEL
Total Energies	TTE
ConocoPhillips	COP
British Petroleum	BP
PetroChina	HK.0857
Petrobras	PBR
Schlumberger	SLB
Halliburton	HAL
Duke Energy	DUK
Occidental Petroleum	OXY
Phillips 66	PSX
Valero	VLO

Alliance Resource Partners	ARLP
Arch Resources	ARCH
Peabody Energy Corp	BTU

Blacklisted firms include, the following publicly-traded companies with major lapses in corporate governance and have participated in unethical business practices:

Name	Ticker	Notes
Wells Fargo	WFC	<p>In 2016, Wells Fargo was charged for fraudulently created millions of savings and checking accounts without their client's consent. Approximately 85,000 accounts incurred fees totaling \$2 million. The Consumer Financial Protection Bureau fined Wells Fargo \$185 million and the total of the additional civil and criminal lawsuits reached \$2.7 billion.</p> <p>Sources: Attorney general Shapiro announces \$575 million 50-state settlement with Wells Fargo Bank for opening unauthorized accounts and charging consumers for unnecessary auto insurance, mortgage fees. Pennsylvania Office of Attorney General. (2018, December 18). https://www.attorneygeneral.gov/taking-action/attorney-general-shapiro-announces-575-million-50-state-settlement-with-wells-fargo-bank-for-opening-unauthorized-accounts-and-charging-consumers-for-unnecessary-auto-insurance-mortgage-fees/</p> <p>Levine, M. (2016, September 9). Wells Fargo opened a couple million fake accounts. Bloomberg.com. https://www.bloomberg.com/view/articles/2016-09-09/wells-fargo-opened-a-couple-million-fake-accounts</p>
Meta Platforms	META	<p>In 2021, an internal document leak released by whistleblower, Frances Haugen, showed that Meta (formerly Facebook) was aware of harmful societal effects from its platform and prioritized profits above seriously addressing these concerns. Among the harmful affects were depression particularly among teenage girls, violence in developing countries, ignoring concerns from Facebook employees that the platform was spreading conspiracy theories about the 2020 US Election, promoting anger-provoking posts, and the spread of vaccine misinformation.</p> <p>Facebook has characterized the information in these leaks as misleading.</p> <p>We want to add that although ConCap® currently has a company Facebook account, we are actively looking at alternatives and no longer run Facebook ad campaigns.</p> <p>Sources: Dow Jones & Company. (2021, October 1). The Facebook Files. The Wall Street Journal. https://www.wsj.com/articles/the-facebook-files-11631713039</p>

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