



**PROXY STATEMENT DISCLOSURE
TRENDS AND ANALYSIS**

DECEMBER 2019

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Introduction

This year Labrador introduced the U.S. Transparency Awards, which ranked the companies in the S&P 250 based on the quality of disclosure in their proxy statements, 10-Ks, and investor relations websites. This report will explain shifts and trends in proxy statement disclosure, using our 2018 Proxy Statement Benchmark report as a baseline. To be clear, the 2018 Benchmark focused on the Fortune 250, which is a different group of companies than we reviewed for the Transparency Awards. In fact, only 138 companies appear on both lists. That means that, while the trends we identified for 2019 will be instructive, our year-over-year comparisons are not perfect.



Not only do regulators now demand increased transparency, but investor activism is on the rise, which heightens scrutiny of company messages by increasingly larger audiences.

In this year’s analysis, we uncovered some interesting new trends, found missed opportunities, and gained insight into what we may see in the future. Overall, we remain optimistic that companies are considering their readers’ informational needs when drafting their documents.

Although standards of best practice evolve over time, certain concepts are evergreen. We find that the best proxies emphasize distinct document structure, jargon-free plain language, and enhanced design features. We are particularly

Spotlight on human capital

Although human capital management disclosure is largely unregulated right now, demands from a cadre of influential voices—including some of the largest institutional investors—are prompting companies to disclose their HCM approach and practices. Investor interest is driven in part by concerns over societal challenges and a growing belief that corporations can help address them (and have an obligation to do so). However, another reason for investor interest is the proven link between effective HCM strategies and strong financial results. For example, BlackRock argues that, in today’s tight labor markets, investors want “companies [to] explain as part of their corporate strategy how they establish themselves as the employer of choice for the workers on whom they depend.” In the same Investment Stewardship Commentary, BlackRock argues that “[p]roduct

The results of our study provide insight into how public companies approach their proxy filings and how they can improve disclosure transparency for all of their readers.

In the seven years we have conducted this review, we have seen significant progress in proxy statement disclosure—in terms of the topics addressed, the information offered, and the clarity of the discussion. Clearly, companies recognize the importance of the proxy statement as a means to communicate their story directly to shareholders. After all, the proxy is one of the few communication vehicles that reaches all shareholders, large and small.

So how does a company cater to diverse readership? Efforts to provide more transparent disclosure geared toward different types of readers benefit companies and their stakeholders alike. That is exactly what we at Labrador work so hard to promote. We firmly believe that clear and transparent disclosure is key to establishing investor confidence in a company, its management, and the board.

pleased that it has become a best practice for proxies to incorporate easily understandable graphics and other visual elements, which are simple tools for disclosing information more clearly. In addition, effective proxies provide summary overviews of each major section and use call-out boxes or similar devices to draw readers’ attention to main ideas. Many companies have adopted this more accessible and readable approach, moving away from the dense text seen in the past.

quality and reputation can suffer when employees are not fully engaged and supportive of the company, its business and goals.” Investors that don’t understand how companies recruit, train, develop, and retain their employees are missing important information.

In response to these pressures, a number of companies have taken steps to voluntarily disclose their approach to ensuring the diverse, engaged pool of talent required to create value and achieve company growth objectives. However, although 81 companies mentioned human capital management in their most recent proxies, only 12 companies indicated that they had integrated HCM into their analysis for performance-based compensation. We will be interested in seeing whether these numbers climb in the coming years.

Hold the board accountable

Another trending issue is the scope of the Board's responsibility, and what information is provided about how the Board discharges its duties. For example, revelations over the past few years about sexual misconduct at the highest corporate levels has put a spotlight on company policies—and particularly on how they are monitored and enforced. Following a recent executive departure from McDonald's in the wake of an "improper personal relationship," New York Comptroller Scott Stringer urged McDonald's to elevate sexual harassment to a Board-level concern:

"[T]he board should formally acknowledge its responsibility for overseeing sexual harassment prevention system-wide, charge a standing committee with this responsibility, and add sexual harassment prevention to the director skills matrix. Additionally, the board should commit to a comprehensive review of Company policy – including executive pay, promotion, recruitment, and retention policies – to ensure that the prevention of sexual harassment throughout the McDonald's system is understood to be a top priority at every level of the Company. Finally, the board should report back to shareholders on its efforts by December 31, 2020."

It is entirely possible that McDonald's and its peers, even those that don't think they have a live problem, will heed Comptroller Stringer's advice. If that happens, we can expect disclosure on the issue in 2021 proxies.

Diversity remains at the forefront

One area that remains a hot topic is boardroom diversity. Despite the increased focus on diversity by both investors and companies, data shows that gender diversity in the boardroom is increasing at a slow rate. There was just a small increase (from 24% to 26%) in the number of women among the S&P 500 directors from 2018 to 2019, and the 2019 figure is not dramatically better than the 16% a decade ago. Still,

But sexual harassment is just one piece of the puzzle. Boards understand that they need to implement the right risk oversight practices and procedures to ensure they detect any potential problem—be it harassment, accounting fraud, a privacy breach, or any other significant risk—and address it promptly and effectively. This year we did see an increase in risk oversight disclosures, with 26% of companies including a graphic to show the different responsibilities assigned to each committee and to the overall board, up from 17% in 2018. We saw an even larger increase (from 63% to 79%) in the number of companies that identify cybersecurity as a risk overseen at the board level.

Finally, investors want to know that directors are doing the most basic parts of their jobs. For example, Glass Lewis now generally recommends voting against the governance committee chair when directors' individual records for board and committee meeting attendance are not disclosed, or the company discloses that someone attended less than 75% of board and committee meetings but does not identify the specific director. Despite those policies, only 36% of companies currently disclose the board's exact aggregate attendance rate for meetings, and only 2 companies (Caterpillar and Regeneron Pharmaceuticals) provide the attendance rate per board member.

In the future, we expect to see companies disclose more details regarding the board's year-round activities, involvement, and oversight.

Consistent compensation disclosures

Approximately 97.3% of Russell 3000 companies received at least majority support on their say-on-pay proposals, with approximately 91% receiving above 70% support. On an aggregate level, these results are largely consistent with results for 2018.

There are several possible reasons for these generally favorable results. First, companies are putting more effort into improving their CD&A disclosures. Overall, we believe that a transparent, well organized, CD&A written

in plain language can persuade investors that a particular compensation structure is best for the company's strategy and long-term interests. On the other hand, the unfavorable votes likely reflected substantive concerns about the rejected executive compensation programs. Some companies granted excessive special grants, and other companies didn't meet rigorous performance targets. It is not at all a sure thing that better graphics or clearer explanations would have changed investor opinions.

<https://comptroller.nyc.gov/wp-content/uploads/2019/11/Investor-Letter-to-McDonalds-re-Clawback-11.26.19.pdf>

2019 U.S. Spencer Stuart Board Index, https://www.spencerstuart.com/-/media/2019/ssbi-2019/us_board_index_2019.pdf

Semler Brossy, 2019 Say on Pay & Proxy Results, <https://www.semlebrossy.com/wp-content/uploads/SBCG-2019-SOP-Report-2019-10-03.pdf>

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

2 Methodology

This marks our first year of benchmarking the S&P 250. Specifically, we studied 248 proxy statements (in PDF and HTML format) filed between September 30, 2018, and August 1, 2019, by the largest S&P 500 companies by market cap. (Two proxies were not available due to mergers or acquisitions.) Our 2018 data covered 238 companies within the Fortune 250, so the year-over-year comparisons we present in this report are not exact. See Appendix A for a list of the 248 companies we used in this benchmark.

We conducted our analysis with the idea that transparent disclosure influences reader behaviors, engenders positive feedback for management, and can affect investors' voting decisions. Proxy statements have evolved considerably since we began this study in 2013, and we have added criteria over the years to reflect those changes. We now look at over 100 unique features, from details like the use of headers and footers, to the bigger picture, such as whether companies include business performance graphics.

3 Analysis

We define general information as the elements that fall outside the governance and compensation sections, including document attributes like page count, color, and design features. These non-verbal elements can add value, helping to ensure clear and accessible disclosure.

Document structure

The average page count was **86 pages**—or three pages longer than the average from 2018.

The number of pages in a proxy statement varies greatly, often because of non-standard proposals and appendices. In our review, we excluded any outliers (such as stock plans up for approval), but we did include non-GAAP reconciliation annexes.

Approximately **65%** use page headers, up markedly from 49% in 2018. (We could not get the exact figure either year

because some companies only post the Edgar version of their document rather than a PDF that reflects the printed proxy.)

71% include footers, including the company name, the year, and the document title. This is consistent with 2018.

Headers and footers—that is, identifiers at the top or bottom of each page—are simple tools for showing readers what they are reading and where they are in the document. Their impact can be significant. For example, if someone prints several proxies to review and the loose pages get mixed up, headers and footers will help the reader quickly identify whose document they are holding.

Document covers

Include a document front cover



36% of front covers include the company logo and the time, date, and place of the Annual Meeting

The cover is the most important page of the proxy because it is the first page your reader will see. We are pleased that

an increasing number of companies are creating brand-reinforcing cover pages. If you forego a designed cover, we recommend using a letter (from the Chair or Lead Director) rather than the Notice of Meeting.

35% include a back cover with substantive information (directions to the annual meeting, sustainability highlights, or links to additional publications), which is an increase from 21% in 2018.

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

- 9% include the table of contents on the inside front cover
- 13% include either the mission or values on the inside front cover

There are many thoughts on how to use the inside front cover most productively, but one thing is certain: leaving it blank is a bad idea. The first page your reader sees should make an impact.

Secondary color

- 86% include a secondary color

We think the simple use of color in both online and printed documents makes it easier for readers to find important information and, if a company is identified with a distinctive color, can be an opportunity to reinforce branding. Adding a second color to an online version carries no cost and makes a document more attractive.

Notice of annual meeting

- 29% include voting icons (mail, phone, internet)

This is not a feature we looked at in 2018, but we think these icons are a simple way to make the Notice of Meeting look more interesting and draw readers’ attention to their voting options.

Letters within the proxy statement

- 39% include a substantive letter from the Chairman or CEO (or combined role) summarizing governance and business highlights (as opposed to just meeting information). (We did not look at this specific data point last year.)
- 4% include a letter from the entire Board of Directors, which is consistent with last year.
- 7% include a letter from the Compensation Committee explaining key updates to the compensation program, which is a slight increase from 5% last year.

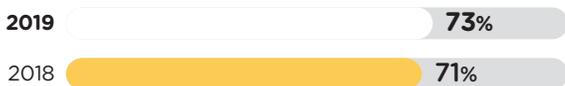
Opening the proxy statement with a well-written letter is an effective way to introduce the reported year, engage

shareholders on specific topics, and set the tone of the document. Unfortunately, companies do not always take advantage of this page to reinforce business highlights, governance decisions, or other company news. While we are certainly in favor of making sure investors know when, where, and how to attend the annual meeting, we don’t believe that administrative information should come from the CEO.

Even though only sixteen companies included a letter from the compensation committee, we see this as a feature that could be readily incorporated into many CD&As, particularly by companies that wish to highlight changes to the program or issues with shareholder support.

Proxy summary

Include a proxy summary



Average page count of proxy summary	5 (consistent with last year)
Maximum page count of proxy summary	11
Minimum page count of proxy summary	1

The rise in proxy summaries—from just 36% in 2013—has been dramatic and (we think) for the good. You can address the demand for understandable and transparent proxy statements, and simultaneously provide useful information for the “skimmers” among your readers, by offering an easy-to-read proxy summary section. The summary shouldn’t simply repeat information that appears later in the document. Instead, use these pages to highlight important overall themes and significant changes to the company’s compensation program or governance practices or the composition of the board.

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

At the heart of a company’s investment story is corporate governance—the framework of rules and practices a board of directors relies on to ensure accountability and fairness in its relationship with stakeholders. In addition, readers want to understand why nominees are considered qualified to oversee management and strategic decisions, and how the board manages risk and remains current on emerging issues.

Director nominees

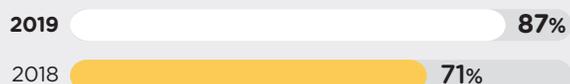
BOARD SIZE

- The average board size is **11.42 directors**
- BlackRock and M&T Bank have the largest boards with **18 directors**
- Microchip Technology has the smallest board with **5 directors**

These numbers are largely unchanged from last year.

DIRECTOR PHOTOS

Include director photos



Photos introduce a human element— literally putting a face to a name. They also make your document look more attractive, and the contrast of images with text draws

in readers. For better or worse, photos can wordlessly highlight diversity (or a lack of it). We expect the number of companies using director photos to continue to steadily grow towards 100%.

DIRECTOR BIOGRAPHIES

Director biographies often include a large block of solid text to describe professional background and affiliations, but 73% of the proxies we reviewed also use distinct formatting (such as subheads or bullets) to call out at least three of the following:

- Age (**82%**)
- “Director since” (**87%**)
- Committee memberships (**69%**)
- Other public directorships (**34%**)
- Nationality (**four companies**: Cognizant Technology, General Electric, LyondellBassell, and Microsoft)

Diversity

In 2009, the SEC adopted rules calling for disclosure about whether and how nominating committees consider diversity in their process. A company that believes its board composition is strong should highlight the mix of skills and traits, clearly showing how the mix is right for the business. A company whose board composition is evolving should consider explaining the long-range plan.

65% include a graphic highlighting tenure diversity, which is a significant increase from 49% in 2018

Number of directors with tenure of 10+ years



34% include a graphic highlighting age diversity, which is a significant increase from 20% last year

3
average number
of women on
the board

50%
include a graphic
highlighting
gender diversity

While no consensus has emerged to support the use of quotas in the U.S., the investor community, regulators, and lawmakers are pushing for more female representation. Perhaps oddly, although the average number of women on boards has barely budged from 2.8 in 2018, the number of companies using a graphic to highlight their gender diversity has increased from 41%.

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

Include individualized skills matrix



Include aggregated skills matrix



Use icons to describe skills and qualifications



Board responsibilities

The average number of board meetings was **8**

Disclose the exact attendance rate for board meetings



Companies are required to say how many directors attended at least 75% of the board and committee meetings they should have attended. We think it is a step in the right direction for companies to disclose more precise information. Some companies do this in the aggregate (i.e., “our directors attended XX% of the applicable meetings”), while others give an attendance figure for each individual director. Going beyond disclosure requirements to offer a precise figure provides better transparency and inspires investor trust.

18% include a graphic or call-out box to describe their current leadership structure, compared to roughly 5% last year

47% split the Chairman and CEO roles, which is a slight increase from last year

53% include a section on director education or training

Companies are beginning to disclose how they ensure their directors are well-versed on strategy and operations so they can fully discharge their Board responsibilities. The most common way we see this information is through the addition of a section devoted to onboarding, training, and continuing education. We believe more companies will adopt this practice in 2020.

A skills matrix of board qualifications is an efficient way to illustrate the board’s diversity of background and experience, and we expect this to become standard when presenting board composition. We are beginning to see companies take the matrix concept one step further, by explaining, for each skill or qualification, why it is valuable to the company, which helps readers understand how board members fit the company’s strategic needs. Finally, the small but not insignificant use of icons to describe skills and qualifications is worth noting. These icons can be repeated in several places other than the skills discussion (such as in the committee membership chart and director biographies) for greater impact.

4.36 average number of committees

69% include a matrix showing committee assignments per director, which is consistent with last year

22% of companies have a Sustainability, CSR, or Public Responsibility Committee

26% include a graphic to show how risk oversight is allocated among the committees and the board as a whole, which is an increase from 17% in 2018

Cybersecurity identified as a risk overseen at the board level



51% list sustainability as a board-level responsibility

The relationship between a company’s management and board of directors continues to be a focus area for both shareholders and regulators, particularly when it comes to monitoring and addressing risk. Given this high level of scrutiny, and increasing concerns about cybersecurity in particular, we can expect more companies to expand their disclosures—possibly with graphics—in the future.

68% of companies have only one non-independent director. In most cases, this is the CEO. This is fairly consistent with last year.

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

Shareholder engagement

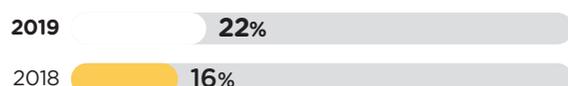
16% of companies include a shareholder engagement graphic within the governance section

This number will likely increase in the coming years given the importance of shareholder engagement and the need for companies to emphasize their commitment to seeking feedback. Including this information in the proxy helps drive

home the point that a company is paying attention to what the investment community thinks, ultimately fostering a closer relationship. Companies should illustrate information (such as the percentage of investors that participated in a dialogue, or key investor concerns and the company's responses to them) rather than describing it. Graphics highlighting these details will draw more attention.

Board evaluation or self-assessment

Graphic illustrating the evaluation process



8% of companies include the evaluation results and steps in place to address any issues

Due to heightened focus on board effectiveness, companies are beginning to include additional disclosure on matters like the director nomination and board evaluation processes to demonstrate that they are focusing on creating and maintaining an effective board. Some companies are using creative flow charts to show the different steps and parties responsible for evaluating the current and future makeup of the board. While the number of companies using graphic techniques for this information remains low, we believe it will continue to increase in 2020.

ESG

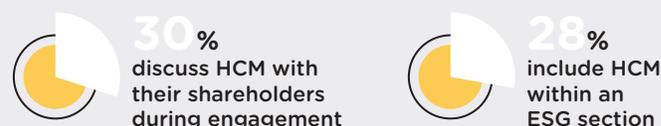
Graphics included in the ESG section



Addressing environmental, social, and governance issues is becoming more important, especially since a growing number of shareholder proposals request deeper disclosure in this area. In 2019, shareholder proposals relating to social topics increased at a quicker rate than environmental proposals. During the first nine months of 2019, 141 proposals on social topics went to vote, nine of which passed with over 50% support.¹⁵⁾ We believe the large increase in graphics included in ESG sections this year is a product of this increased interest, and we expect the trend to continue. Even companies that produce a standalone Sustainability Report should think about including a callout box or a section in the proxy statement to highlight key information. (This content will get a lot of attention if you put it on one of the inside covers.) If nothing else, provide a link to the Sustainability Report within the proxy statement.

HUMAN CAPITAL MANAGEMENT

81 companies discuss human capital management. Within these companies:



- **37%** list HCM as a board skill or experience
- **45%** identify HCM as a risk that is overseen by a committee or the full board
- **12 companies** indicate they integrate HCM into their analysis for performance-based compensation

Due to the heightened focus on human capital management, including shareholder proposals on gender parity, it is important to have this topic on your radar for 2020. For a start, consider explaining how your board is actively involved in HCM through its committees and engagement with management. Within the ESG or HCM section of the proxy, explain how you invest in your workforce through informal and formal training programs. You should also provide key figures, highlighting things such as workforce diversity, gender pay equity, and employee retention. Finally, if your annual incentive program includes individual performance criteria, consider explaining how each NEO has contributed to workforce diversity and employee retention.

Semler Brossy, 2019 Say on Pay & Proxy Results, <https://www.semlebrossy.com/wp-content/uploads/SBCG-2019-SOP-Report-2019-10-03.pdf>

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Director compensation

9 companies (Accenture, BlackRock, Coca-Cola, Cognizant Technologies, CVS Health, Goldman Sachs, PepsiCo, UPS, and Zoetis) included a graphic to break down compensation in cash vs. stock, which is a slight increase from 3 companies in 2018.

Director pay has been receiving a great deal of scrutiny in the press of late, so it makes sense for companies to start using

whatever tools are available to them to ensure their director compensation programs are shown in the most appealing (but always truthful) light. That may mean emphasizing how much of director compensation is in the form of equity, and explaining what restrictions (such as holding periods and ownership requirements) apply to that equity.

The most-read section of any proxy, the CD&A tells a company's compensation story. The challenge here is to be both informative and accessible while respecting regulations that require extensive details. This is where color, graphics, and a clearly defined document hierarchy are particularly useful. You can use these tools to pull out important elements of information and make it easier for readers who prefer not to wade through dense narrative sections to see the big picture.

Include a table of contents



Any complex section that is longer than 20 pages should have a mini table of contents.

61% have an executive summary, which is consistent with last year

Summaries are an important tool in proxy statements because they quickly engage readers who might otherwise turn to proxy advisor reports (or, let's be honest, toss the document in the recycling bin). We are surprised that more companies have not elected to add an executive summary to their CD&A. Like a proxy summary, the executive summary should provide highlights, but not directly repeat content in the main part of the CD&A.

64% include a "what we do / don't do" table

88% mention they have a clawback policy

These numbers are consistent with last year.

Elements of the compensation program can be complex and scattered throughout the document, so it is important to highlight the main practices that a reader might otherwise have to search for.

Performance highlights



Graphics showing performance highlights are much easier to digest than straight text, and can help investors quickly understand how the company is performing against targets that affect compensation. They also are a great way to emphasize business results, especially when there is a positive story to tell. There are three things to keep in mind, though. First, you should be reasonably consistent with the metrics you highlight from year to year, even if the numbers aren't always rosy. Second, be sure to link business highlights to specific components of the pay program. Third, if you use non-GAAP figures, we suggest highlighting the corresponding GAAP numbers in graphical form as well.

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Other compensation-related graphics

Graphics are extremely useful for readers, especially when they convey information that would otherwise require a detailed narrative. Overall, 61% of companies use at least three graphics to depict the compensation of their NEOs. Compensation mix, payout scenarios, and peer comparisons are all good candidates for an effective graphic. To the right is a list of some graphics we believe all proxies could include, and the percentage of companies in our benchmark that already use them.

83% include a graphic showing the CEO/NEO pay mix (consistent with 2018)

13% include a graphic showing pay vs. peer company pay

16% include a graphic depicting CEO pay vs. TSR

11% include a graphic depicting realized vs. realizable (reported) pay

Pay decisions

ANNUAL INCENTIVES

- **25%** include a graphic highlighting the annual incentive metrics, up from 17% in 2018

Annual incentive calculation graphic



- **43%** include a table or graphic to present the target and final results under the annual incentive plan

LONG-TERM INCENTIVES

Long-term incentive awards mix graphic



- **33%** include a table or graphic to present the target and final results under the long-term incentive plan

Several companies included graphics to illustrate complex subjects such as long-term incentive plans, depicting payout scenarios as well as a breakdown of the long-term incentives actually awarded. We expect this practice to grow since it conveniently demonstrates a link between pay and performance.

4 What to expect in 2020

Proxy statements will continue to grow in length as companies respond to shareholder demands for more information on a broader range of topics. Because the target audience for proxies has grown, companies are responding to many different needs. For example, ESG investors are asking for more context around the company's beliefs and value creation model in order to understand why the board is fit for the business. We also expect shareholder proposals to remain focused on social and environmental issues, and potentially turn to political spending disclosures and gender pay equity. This will likely cause companies to disclose increasingly more ESG and HCM information.

Similarly, investors want to understand why particular metrics were selected for (and other metrics omitted from) the compensation program. We anticipate more companies will include a brief overview of their strategic objectives and key performance indicators to address such concerns.

Finally, companies must persist in their efforts around board diversity—both expanding it and talking about it. Some will decide it is time to adopt a well-defined diversity policy, or to enhance a policy already in place. NYC Comptroller Stringer and his Boardroom Accountability Project 3.0 might be the driving force on this point. The Comptroller's office recently sent a letter to the nominating/governance committee chairs of 56 S&P 500 companies that have not disclosed a diversity search policy that includes "Rooney Rule" language, insisting they work to increase gender and racial diversity at the highest corporate levels.

We encourage public companies to remain on the path toward more transparent disclosure. To that end, we will continue to develop creative ways to help our clients highlight corporate governance, business performance, executive compensation, ESG issues, risk management, and whatever other information the market demands.

<https://corpgov.law.harvard.edu/2019/10/30/nyc-comptroller-boardroom-accountability-3-0/>

<https://comptroller.nyc.gov/services/financial-matters/boardroom-accountability-project/boardroom-accountability-project-3-0/>

The 2018 data is based on our Benchmark using the Fortune 250 proxies filed between January 1, 2018, and August 15, 2018.

5 Appendix

The following **bolded** companies overlap between the 2018 and 2019 reports.

3M	Boeing	Eaton	Intuitive Surgical
Abbott Laboratories	Booking Holdings	eBay	IQVIA Holdings
AbbVie	Boston Properties	Ecolab	Johnson & Johnson
Accenture	Boston Scientific	Edison International	Johnson Controls
Activision Blizzard	Bristol-Myers Squibb	Edwards Lifesciences	JPMorgan Chase
Adobe	Broadcom	Electronic Arts	Kimberly-Clark
Advanced Micro Devices	Capital One Financial	Eli Lilly	Kinder Morgan
Aflac	Carnival	Emerson Electric	Lam Research
Agilent Technologies	Caterpillar	EOG Resources	Linde plc
Air Products and Chemicals	Centene	Equinix	Lockheed Martin
Alexion Pharmaceuticals	Charles Schwab	Equity Residential	Lowe's Companies
Allergan	Charter Communications	Estee Lauder	LyondellBasell
Allstate	Chevron	Eversource Energy	M&T Bank
Alphabet	Chubb Limited	Exelon	Marathon Petroleum
Altria Group	Cigna	Exxon Mobil	Marriott International
Amazon.com	Cisco Systems	Facebook	Marsh & McLennan
American Electric Power	Citigroup	FedEx	Mastercard
American Express	CME Group	Fidelity National	McDonald's
American International Group	Coca-Cola	Fiserv	McKesson
American Tower	Cognizant Technology	Ford Motor	Medtronic
Amgen	Colgate-Palmolive	Fortive Corp.	Merck
Amphenol	Comcast	General Dynamics	MetLife
Anadarko Petroleum	Concho Resources	General Electric	Microchip Technology
Analog Devices	ConocoPhillips	General Mills	Micron Technology
Anthem	Consolidated Edison	General Motors	Microsoft
Aon plc	Constellation Brands	Gilead Sciences	Mondelez International
Apple	Corning	Global Payments	Monster Beverage
Applied Materials	Costco Wholesale	Goldman Sachs	Moody's
Aptiv PLC	Crown Castle	Halliburton	Morgan Stanley
Archer-Daniels-Midland	CSX Corporation	HCA Healthcare	Motorola Solutions
AT&T	Cummins	Hewlett Packard Enterprise	Netflix
Autodesk	CVS Health	Hilton Worldwide	NextEra Energy
Automatic Data Processing	Danaher	Home Depot	NIKE
AutoZone	Deere	Honeywell	Norfolk Southern
AvalonBay Communities	Delta	HP	Northern Trust
Bank of America	Digital Realty Trust	Humana	Northrop Grumman
Bank of New York Mellon	Discover Financial	IBM	NVIDIA Corporation
Baxter International	Dollar General	Illinois Tool Works	O'Reilly Automotive
BB&T	Dollar Tree	Illumina	Occidental Petroleum
Becton Dickinson	Dominion Energy	Ingersoll-Rand	ONEOK
Berkshire Hathaway	DowDuPont	Intel	Oracle
Biogen	DTE Energy	Intercontinental Exchange	PACCAR
BlackRock	Duke Energy	Intuit	Parker-Hannifin

Paychex	Realty Income	Synchrony Financial	Ventas
PayPal	Red Hat	Sysco	Verisk Analytics
PepsiCo	Regeneron Pharmaceuticals	T-Mobile	Verizon Communications
Pfizer	Rockwell Automation	T. Rowe Price	Vertex Pharmaceuticals
Philip Morris	Roper Technologies	Target	Visa
Phillips 66	Ross Stores	TE Connectivity	Walgreens Boots Alliance
Pioneer Natural Resources	S&P Global	Texas Instruments	Walmart
PNC Financial Services	salesforce.com	Thermo Fisher Scientific	Walt Disney
PPG Industries	SBA Communications	TJX	Waste Management
PPL	Schlumberger	TransDigm Group	WEC Energy Group
Procter & Gamble	Sempra Energy	Travelers Companies	Wells Fargo
Progressive	Sherwin-Williams	Twitter	Welltower
Prologis	Simon Property	U.S. Bancorp	Williams Companies
Prudential Financial	Southern Company	Union Pacific	Willis Towers Watson
Public Service Enterprise Group	Southwest Airlines	United Parcel Service	Xcel Energy
Public Storage	Starbucks	United Technologies	Xilinx
QUALCOMM	State Street	UnitedHealth Group	Yum! Brands
Raytheon	Stryker	V.F. Corporation	Zimmer Biomet
	SunTrust Banks	Valero Energy	Zoetis

