CATALYZING CORPORATE CHANGE

2026 PROXY SEASON RECAP

INTERFAITH CENTER ON CORPORATE RESPONSIBILITY

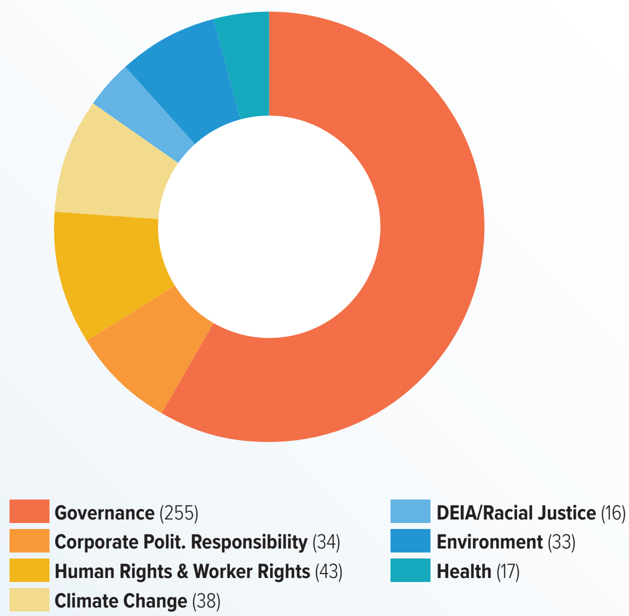
A REVIEW OF ICCR'S 2026 PROXY SEASON

During the 2026 proxy season, ICCR's members continued to press their portfolio companies for changes in policies and practices to mitigate harmful environmental and social impacts. While engagement progress most often results from ongoing dialogues with companies, when dialogues stall or become unproductive, investors may file shareholder proposals as a means of escalation. What follows is a review of the outcomes of the 436 shareholder proposals that our members filed this season on a range of climate, worker rights, human rights, governance, health equity, and supply chain issues. With 58 withdrawal agreements and some exciting new proposals, we're excited to share with you some highlights from the 2026 proxy season.

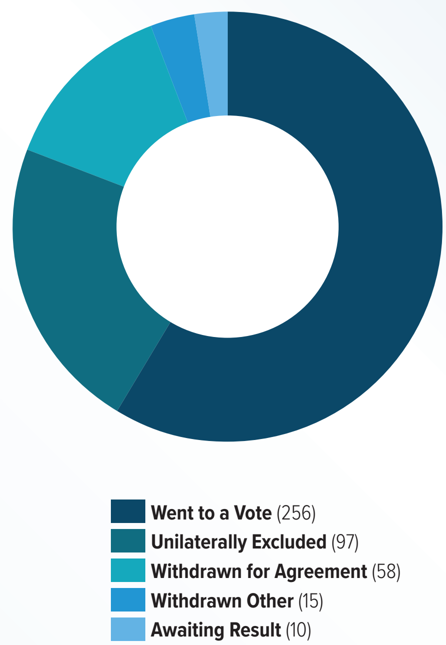
2026 PROPOSALS BY ISSUE

This season, corporate governance themes led the way with 255 proposals*. Proposals focusing on human rights and worker rights were the second most active category of filings at 43, followed by the climate crisis (38), corporate political responsibility (corporate lobbying & political spending) (34), and the environment (33).

2026 PROPOSALS BY ISSUE



2026 PROPOSALS BY OUTCOME



Fifty-eight percent of resolutions filed by our members (256 proposals) went to a vote, achieving an overall average vote of 27.40%, an increase from 20.18% last year. Eighteen of these won majority votes, up from thirteen one year ago. Four votes reached or surpassed 90 percent. The increase in average vote was primarily driven by higher votes on governance-related filings.

In a dramatic departure from a decades-long practice, in mid-November 2025 the SEC Staff announced it would not be issuing determinations on the validity of companies' challenges to shareholder resolutions. Traditionally, if a company sent the Staff a request outlining why it believed it could exclude a proposal from its proxy statement, the proponent could respond, and the Staff would consider both sides' arguments before deciding whether to concur with a company's request. As a consequence of the SEC's decision, multiple companies chose to unilaterally omit our members' proposals from their proxy ballots this season. These are indicated in the chart as "Unilaterally Excluded".

**The majority of this year's governance proposals were filed by one ICCR member – Chevedden Corporate Governance.*

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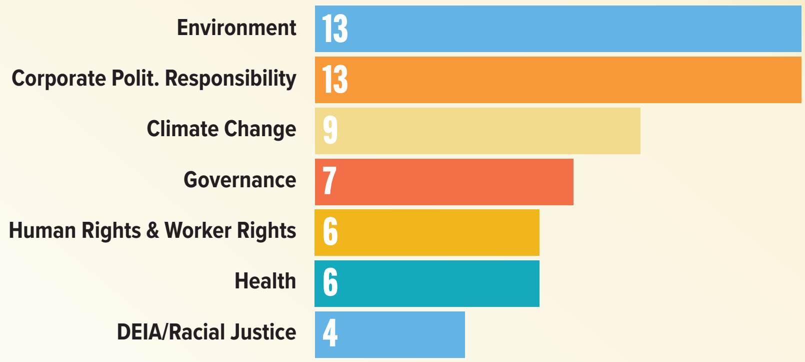
2026 CORPORATE COMMITMENTS BY ISSUE

Once a proposal is filed, the company will often reach out to the proponents to negotiate. If the company agrees to satisfy the main requests of the proposal, proponents will voluntarily withdraw it. This year, our members successfully negotiated 58 corporate commitments. Most of this year's commitments related to the environment (13) and corporate political responsibility (13), followed by climate change (9). A more detailed discussion of key withdrawals appears on page 3.



NEW PROPOSALS THIS YEAR

Assess Risks to Customers' Data Privacy Rights Due to Company's Sharing of Data: To better protect customer's privacy rights when companies collect & share their sensitive race, biometric and geolocation data with law enforcement and government authorities.

Avoid Shifting Costs of New Infrastructure for Data Centers: So that residential and small business customers are not unfairly burdened with the costs of electric system expansion needed for data center buildouts.

Assess / Manage Risks from Chemicals and Food Additives in Food & Beverage Products: To improve nutrition and better protect human health.

Assess Healthcare Consequences of Acquisitions: To shed light on the ways vertical integration in the healthcare sector may be negatively impacting patient care and health outcomes.

Directors Who Fail To Obtain A Majority Vote: To ensure that in the event of failed elections, directors leave their boards promptly, enhancing corporate accountability.

Horseshoe Crab-Derived Endotoxin Testing: To encourage pharmaceutical companies to adopt synthetic alternatives to horseshoe crab blood to protect declining global horseshoe crab populations.

Assess Impact of Recent U.S. Immigration Changes: on the U.S. meatpacking industry, which relies on immigrant labor and is increasingly turning to illegal child labor in response to a severe labor shortage.

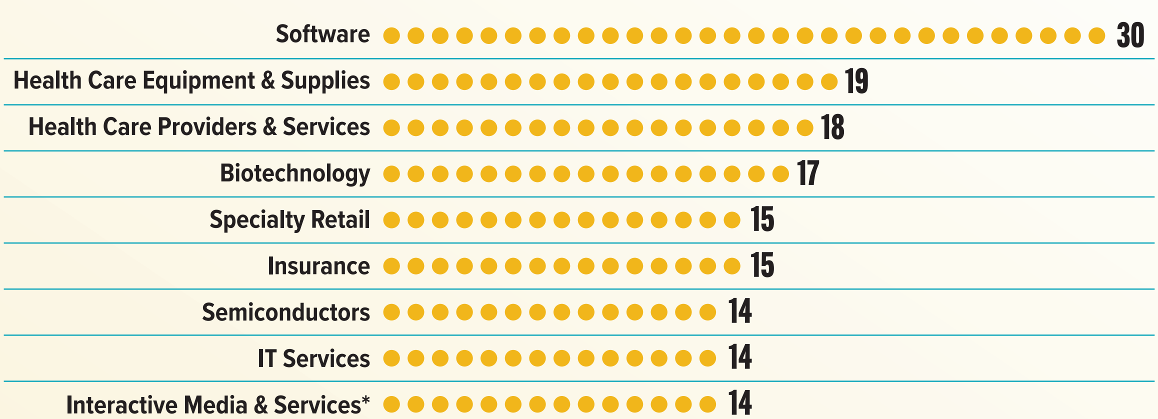
Adoption of Regenerative Agriculture Programs: To protect soil health, water quality, and reduce greenhouse gas emissions, while making global food supply chains more resilient in the face of disruptions caused by climate change and associated severe weather events.

Report on Human & Environmental Harms Associated with Waste Lagoons: To improve air and water quality for communities living near concentrated animal feeding operations.

Share Aggregation to Facilitate Shareholder Proxy Access: So that shareholders can have more opportunities to nominate candidates to boards of directors, increasing shareholder democracy.

Subrogation as Strategy to Reduce Climate-Related Risk: To help combat the nationwide homeowners insurance crisis, driven by catastrophic losses due to climate change and intense weather-related disasters.

2026 RESOLUTIONS FILED BY INDUSTRY



***The Interactive Media industry includes tech companies such as Alphabet and Meta (Facebook)*

2026 FEATURED WITHDRAWALS FOR CORPORATE COMMITMENTS

CORPORATE POLITICAL RESPONSIBILITY AGREEMENTS

Chipotle: Added additional language to its Government Relations Policy outlining the steps it is taking to reduce lobbying misalignment between its publicly stated values regarding an inclusive workplace and its indirect public policy advocacy in opposition to raising the sub-minimum wage (Friends Fiduciary).

CoStar Group, F5, Floor & Decor Holdings, Marsh & McLennan Companies, Teradyne, and WESCO International: Agreed to take actions that would significantly improve their respective scores in the CPA-Zicklin Index of Corporate Political Disclosure and Accountability, in response to a shareholder proposal (Chevedden Corporate Governance).

Hasbro: Is a member of the Toy Association, which lobbies against regulation of chemicals in toys. The company has agreed to disclose on its website how it how it assesses and manages situations where the lobbying done by its toy trade associations is misaligned with the company's policies, including its work to ensure the safety of chemicals in its toys (Green Century).

Incyte: Spent $480,000 in lobbying in 2026 alone; it has now agreed to publish a Political Activity and Public Policy Statement that lists how its board oversees it public policy spending and lobbying activities (United Church Funds).

Intercontinental Exchange: Agreed to enhanced disclosures regarding its advocacy priorities, clarifying its Board governance oversight, and has agreed to create spending bands for its trade association spending (United Church Funds).

Cheniere Energy: Agreed to annually disclose its contributions to political candidates, parties, and committees; its independent political expenditures made in direct support of or in opposition to a campaign; its payments made to influence the outcome of ballot measures; and the amounts given to trade associations and other tax-exempt entities engaging in political activities (Nathan Cummings Foundation).

GOVERNANCE AGREEMENTS

CVS Health Corp: CVS Health is making major investments in AI, even as the number of AI-enabled cyber-attacks on businesses rose approximately 47% in 2025. It has agreed to expand its disclosure on AI-related matters, and to take additional steps to help ensure that its board has an adequate level of cybersecurity & AI expertise (Open MIC).

Exact Sciences, Intellia Therapeutics, Ionis Pharmaceuticals, Marriott, Nino, United Therapeutics, Upwork, Veracyte, and Yext: Agreed to adopt "right to cure" bylaw amendments in response to shareholder engagement. The amendments give shareholders a specified period to correct facial defects, such as missing or obviously incorrect information, in director-nomination notices. This is expected to reduce legal expenses for both sides (Corporate Governance).

United Therapeutics: Agreed to replace supermajority voting with a majority voting standard on shareholder proposals – a more democratic voting standard already used by more than 90% of the companies in the S&P 500 — and to add a "right to cure" (Corporate Governance).

Citigroup: Agreed to not enter into any new employment agreement, severance agreement or separation agreement, or establish any new executive severance plan that provides for cash severance benefits exceeding 2.99 times the sum of the Executive Officer's base salary and bonus, without seeking stockholder ratification (Chevedden Corporate Governance).

Arlo Technologies: Agreed to adopt a "proxy access" right, permitting a stockholder (or a group up to 40) owning at least 3% for at least three years, to include director nominees in the company's proxy materials (Corporate Governance).

Invesco: Agreed to amend its bylaws so that shareholders may remove directors even without proving misconduct or another specific reason (Corporate Governance).

CLIMATE CHANGE AGREEMENTS

Albertsons and Sprouts: Illegal conversion of forests to agricultural production is widespread throughout the Mexican avocado supply chain. The burning associated with conversion releases greenhouse gases, reduces carbon storage, and increases floods and landslides. Both companies agreed to require Pro Forest Avocado certification for their avocado suppliers, ensuring that suppliers do not source avocados from orchards sited on recently deforested land (Amalgamated Bank).

Costco: Following a 2025 dialogue and a resolution filed in 2026, Costco introduced new commitments aimed at reducing deforestation risks in its avocado supply chain, including requiring suppliers to avoid sourcing from illegally deforested lands, increasing third-party certifications, and committing to annual supply chain mapping and risk assessments (As You Sow).

Bank of America: After 2 years of engagement, BoA has agreed to stop lending to companies driving deforestation. Such a policy coming from the second largest bank in the U.S., and sixth largest bank in the world, means that companies seeking financing from BoA will have to protect the world's forests to receive a loan for their operations (Green Century).

Columbia Sportswear: Has pledged to decrease climate pollution from its buildings over the next decade. Columbia says it will publish its plans, which will include using more solar power and becoming more energy efficient. The company also agreed to share its timeline for reporting greenhouse gas (GHG) emissions from its supply chain, the largest source of its carbon contribution (Green Century).

Chubb Limited: In response to a shareholder proposal, Chubb, one of the largest insurance companies in the world, included, for the first time, examples of its engagements with government regulators and industry leaders on climate-related legislation in its most recent sustainability report (Green Century).

Toll Brothers: Toll Brothers – the fifth largest home builder in the U.S. – had not previously disclosed its GHG emissions or set a GHG reduction target. In response to a new shareholder proposal, it has agreed to report its Scope 1& 2, and Scope 3 Category 1 and Category 11 GHG emissions, for three years (Amalgamated Bank).

**Organizations listed in parentheses are lead filers.*

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2026 FEATURED WITHDRAWALS FOR CORPORATE COMMITMENTS

WORKER RIGHTS / HUMAN RIGHTS AGREEMENTS

Equifax: **Sells and shares sensitive consumer data records with lenders, employers, landlords, and others who incorporate it into important decisions affecting consumers. It agreed to disclose information related to the risks and opportunities posed by its use of AI technologies with a focus on governance refinements, risk and value proposition, and human impacts.** (Nathan Cummings Foundation).

Aramark: **In response to a shareholder proposal asking the Board to develop a compensation philosophy that ensures a living wage for all its employees, Aramark committed to enhanced disclosure of its hourly employees' wages – an important first step towards a more empowered rank and file workforce** (Sisters of St. Francis of Philadelphia).

Eaton: **Has in recent years grown increasingly reliant on income from defense contracts. It has now agreed to add end-use monitoring language to its Human Rights Policy, specifically regarding defense systems, to help ensure that its products do not become linked to human rights violations in conflict zones** (NorthStar Asset Management).

HEALTH EQUITY AGREEMENTS

Gilead Sciences: **Has been criticized for limiting access to its lifesaving medications, but has recently committed to strengthening its human rights policy by adding internationally recognized standards, including the human right to health** (Mercy Investment Services).

DIVERSITY, EQUITY AND INCLUSION AGREEMENTS

Advance Auto Parts, Goodyear Tire: **Agreed to greater transparency regarding the effectiveness of their efforts to create meritocratic workplaces.** (Amalgamated Bank)

Insulet Corporation, Molina Healthcare: **Agreed to disclose their EE0-1 reports annually.** (Friends Fiduciary)

ENVIRONMENT AGREEMENTS

Gap: **500,000 tons of plastic microfibers from textiles enter the world's oceans annually. Gap will include a microfiber shedding section in its 2025 Impact Report outlining the steps it is taking to reduce shedding and mitigate this ocean pollution. Gap will also issue guidance for its customers on which fabrics shed more, and ways to minimize shedding** (Amalgamated Bank).

Lululemon: **Committed to continuing its efforts towards more precise measurement of the microfiber shedding rate of its fabrics, and of the current level of reduction of microfibers being achieved at the supplier level as a means of mitigating the environmental impacts of their manufacturing processes. It will also continue to collaborate with leading industry groups working on microfiber research** (Amalgamated Bank).

Digital Realty: **Provided the information requested in a water impacts resolution. Within the report, DLR listed WUE by regions and provided a water stress map of its operations.** ***While this was not a withdrawal agreement, the company met the asks of the proposal*** (NorthStar Asset Management).

Sunrun Inc: **Following a dialogue, Sunrun, the nation's largest residential solar and storage company, joined the growing number of businesses calling for a moratorium to ensure that no deep seabed mining operations proceed unless and until comprehensive scientific assessments demonstrate that such activities can be managed to avoid biodiversity loss and ecosystem degradation** (As You Sow).

**Organizations listed in parentheses are lead filers.*

ACTIONS TAKEN IN DEFENSE OF SHAREHOLDER PROPOSALS

179 EXEMPT SOLICITATIONS PUBLISHED

41 CALLS TO VOTE AGAINST DIRECTORS

17 INVESTOR STATEMENTS/ COMMENTS

4 LAWSUITS FILED

3 AMICUS BRIEFS FILED