

Updated: June 22, 2021

Endorsements for Public Country-by-Country Reporting

*marks endorsement of House or Senate legislation (H.R.3007, S.1545). Other entries signify endorsement of the concept of public country-by-country reporting.

Analysts

• David Gonzales, VP-Senior Accounting Analyst, Corporate Finance Group, Moody's Investors Service, Inc.²⁴

Business (Large):

- Anglo American Plc ¹²
- BHP Billiton ¹⁶
- ENI 21
- Equinor ²⁵
- Repsol 17
- Rio Tinto 15
- Royal Dutch Shell ¹³
- Vodafone Group Plc ¹⁴

Business (Small):

- *American Sustainable Business Council 7, 22, 23,28
- Coalition for a Prosperous America
- *Main Street Alliance 4,7, 22, 23,28
- *National Small Business Network 7, 22, 23
- *Small Business Majority 7, 22, 23,28
- *South Carolina Small Business Chamber of Commerce ⁹

Investors (Firms, with Over \$103 Trillion in Assets under Management):

- Accountancy Europe ^{10,11,12}
- *ACTIAM 8,27
- *Æquo, Shareholder Engagement Services ^{8,12,27}
- *American Federation of Labor and Congress of Industrial Organizations (AFL-CIO)²⁷
- *American Federation of State, County and Municipal Employees (AFSCME)^{8,12}
- *American Federation of Teachers ²⁷
- Amundi ²⁹
- Australian Council of Superannuation Investors (ACSI)
- Australian Shareholder's Association ¹²
- *Bâtirente 8,27,29
- BMO Global Asset Management ^{1,3}
- Brunel Pension Partnership (BPP) ²⁹
- *Boston Common Asset Management 1,2,3,8,12,27

- *Canadian Labour Congress Employee Pension Plan 8,27
- Candriam Investors Group 29
- *CCLA Investment Management ²⁷
- CCOO, FP ²⁹
- Cheshire Pension Fund ¹²
- *Church Commissioners for England 8,12,27,29
- *Church of England Pensions Board ²⁷
- *Clean Yield Asset Management ^{8,27}
- CLP Holding Limited ¹²
- *Communication Workers of America (CWA)²⁷
- *Congregation of Sisters of St. Agnes^{8,27}
- *CorpGov.net ^{8,27}
- Change to Win Investment Group ^{1,2,3}
- *CtW Investment Group 8,12,27
- *Dana Investment Advisors 8,27
- *DBAY Advisor Limited ²⁹
- *Decatur Capital Management ^{2,8,12,27}
- *Domini Impact Investments LLC 1,2,3,8,12,27,29
- *Dominican Sisters ~ Grand Rapids ^{8,27}
- Dutch Association of Investors for Sustainable Development (VBDO) ¹¹
- Ecofi Investissements ²⁹
- Engagement International ²⁹
- ERAFP (Etablissement de Retraite Additionnelle de la Fonction Publique Pension Scheme)²⁹
- Eumedion ¹²
- *Ethos Engagement Pool International 27,29
- *Ethos Foundation 27,29
- *Etica Sgr Responsible Investments 1,3,8,12,27,29
- *Everence and Praxis Mutual Funds ²⁷
- Fondo de Pensiones de Empleados de Telefónica ¹²
- *First Affirmative Financial Network ^{1,2,8,12,27}
- *Franciscan Sister of Perpetual Adoration ^{1,3,8}
- *Friends Fiduciary Corporation 1,2,8,12,27
- *Fund for Constitutional Government ^{8,27}
- *Harrington Investments, Inc. 1,2,8,12,27
- Hermes EOS ^{11,12}
- *Hexavest ^{27,29}
- Illinois State Treasurer's Office 1,11
- Impax Asset Management ²⁹
- *Interfaith Center on Corporate Responsibility 1,2,3,8,12,27
- *International Brotherhood of Teamsters ²⁷

FACTCOALITION

- *Investor Advocates for Social Justice ^{3,8}
- *Ircantec ^{1,12,27,29}
- JLens Investor Network 1,2,3,12
- KLP 29
- Kutxabank Gestion SGIIC SAU ²⁹
- *Lady Lawyer Foundation ^{27,29}
- LBPAM (La Banque Postale Asset Management)²⁹
- *Legal & General Investment Management (LGIM) 11,12,27,29
- *Legal & General Investment Management America (LGIMA)⁸
- LGPS Central Limited 12,29
- Lincolnshire Pension Fund ¹²
- *Local Authority Pension Fund Forum ^{1,3,8,12,27,29}
- LocalTapiola Asset Management Ltd²⁹
- LUCRF Super ¹²
- *Maryknoll Fathers and Brothers 1,2,3,8,12
- *Maryknoll Sisters 3,8,27
- *Mercy Investment Services, Inc. 8,27
- MFS Investment Management ¹¹
- *Middletown Works VEBA 8,27
- Midwest Coalition for Responsible Investment¹
- *Miller/Howard Investments, Inc. 1,2,8,12,27
- Mirova 29
- *Missionary Oblates/OIPTrust ^{1,2,3,8,12,27}
- *National Education Association ²⁷
- *Natural Investments ^{1,2,8,12,27}
- *NEI Investments 8,27,29
- *Newground Social Investment 8,27
- *New York City Office of the Comptroller ^{1,12,27}
- The New York State Common Retirement Fund ^{2,12}
- Norges Bank Investment Management (NBIM) ¹²
- *NorthStar Asset Management, Inc 8,27
- *Northwest Coalition for Responsible Investment ^{1,8,27}
- *Oxfam America 27
- P+ 29
- PenSam 12
- Pension Fund of Early Childhood and Youth Educators (PBU)¹²
- Pension Plan for the Employees of the Canadian Labour Congress ^{1,8}
- Pensions Caixa 2 Pension Fund ¹²
- PFA ¹²
- PKA 12,29
- *The Province of Saint Joseph of the Capuchin Order 3,8,27
- Principles for Responsible Investment ^{10,11}
- Rathbone Greenbank Investments ^{1,12}
- Repsol II, Fondo de Pensiones 12
- *RRSE (Regroupement pour la Responsabilité Sociale des Entreprises)^{8,27}
- *Reynders, McVeigh Capital Management, LLC^{8,27}
- Robeco ²⁹
- Royal London Asset Management ¹¹
- Sampension ²⁹
- Scherman Foundation ^{2,12}

- *School Sisters of Notre Dame Cooperative Investment Fund ^{1,27}
- *Seventh Generation Interfaith Coalition for Responsible Investment ^{1,2,3,8,12,27}
- *Shareholder Association for Research and Education 1,8,12
- Shareholders for Change (SfC) ²⁹
- *Sisters of Charity of Saint Elizabeth ^{1,2,12,27}
- *Sisters of St. Dominic of Caldwell, NJ ^{1,2,8,12,27}
- *Sisters of St. Francis of Philadelphia ^{2,8,9,12,27}
- *Sisters of the Incarnate Word and Blessed Sacrament⁸
- *Skye Advisors LLC ^{8,27}
- *Stewart R. Mott Foundation ^{1,2,8,12,27}
- *Sustainalytics ⁸
- Sycomore Asset Management ²⁹
- The Sustainability Group of Loring, Wolcott & Coolidge ¹
- *Toniic Institute 27
- *Trillium Asset Management ¹
- Triodos Asset Management ²⁹
- Tri-State Coalition for Responsible Investment 1,2,12
- TWU Superannuation Fund ¹²
- Tyne and Wear Pension Fund ¹²
- UAW Retiree Medical Benefits Trust ^{1,2,3,12}
- U Ethical 12,29
- UFCW Pension Plan for Employees ³
- *UNISON 8,27
- *Unitarian Universalist Association 8,27
- *UNITE HERE 8,27
- Unite Pension Scheme ¹²
- *United Church Funds ²⁷
- United Food and Commercial Workers International Union Pension Plan for Employees¹
- Ursuline Sisters of Tildonk, U.S. Province¹
- *Vert Asset Management ⁸
- *Vision Super Pty Ltd ^{1,8,12,27,29}
- Wallace Global Fund ^{2,12}
- *Zevin Asset Management 1,2,3,8,12,27

Investors (Individuals):

- Joel Kanter, President, Windy City Inc. ¹⁹
- Josh Kanter, President, Chicago Financial, Inc. ¹⁹
- Art Lipson, CIO, Western Investment LLC ¹⁹
- Terence Meehan, Chairman and CEO, Azimuth Trust ¹⁹
- Morris Pearl, former Managing Director, BlackRock Inc.¹⁸
- Jonathan Ruga, CEO, Sentry Financial ¹⁹
- Whitney Tilson, former Managing Partner, Kase Capital Hedge Fund¹⁹

Labor Unions:

- ACFO-ACAF ¹²
- *AFL-CIO 1,2,3,4,6,8,9,12,26
- *American Federation of Government Employees (AFGE) ²⁶

- *American Federation of State, County and Municipal Employees (AFSCME) ^{1,2,3,6,8,12}
- American Federation of Teachers ^{3,26}
- *Communications Workers of America (CWA) 6,8,9,26
- CCOO (Federación de Servicios) ¹²
- CCOO FP ¹²
- CCOO INDUSTRIA 12
- FNV 12
- IndustriALL Global Union ¹²
- *International Association of Machinists and Aerospace Workers ⁹
- International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART)¹
- International Brotherhood of Electrical Workers ¹
- *International Brotherhood of Teamsters 1,2,3,8,9,12,26
- *International Federation of Professional and Technical Engineers ^{9,26}
- International Transport Workers' Federation ¹²
- International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW)^{6,9}
- International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Association (IUF)¹²
- *Industrial Division of the Communication Workers of America (IUE-CWA)²⁶
- *National Education Association ^{1,8,9,26}
- Public Services International ^{10,11,12}
- Australian Manufacturing Workers Union ¹²
- *Service Employees International Union (SEIU) 9,12,26
- South African Democratic Teachers' Union (SADTU)¹²
- *Union Veterans Council, AFL-CIO 9,26
- *UNITE HERE International Union 1,8,26
- *United Auto Workers (UAW) 9,26
- *United Steelworkers (USW)^{8,9,26}
- United Voice 12

NGOs:

- *Academics Stand Against Poverty 9
- *Accountability Counsel²⁶
- *Accountability Lab 9
- ActionAid International ¹²
- *Advocacy for Principled Action in Government ^{6,9}
- *Africa Faith & Justice Network 9,26
- *AfricaFocus Bulletin 9,26
- ALTSEAN Burma ⁵
- *American Family Voices 9,26
- *Americans for Democratic Action (ADA) 6,9,26
- *Americans for Financial Reform 6,9,26
- *Americans for Tax Fairness ^{5,6,9,26}
- *Asia Initiatives 5,9,26
- *Association for Concerned Africa Scholars USA ²⁶
- Australasian Centre for Corporate Responsibility (ACCR)¹²
- BEPS Monitoring Group ¹²
- *Campaign for America's Future 9,26
- Canadians for Tax Fairness ¹²
- *Center for American Progress ^{5,9}

- Center for International Corporate Tax Accountability & Research (CICTAR)¹²
- *Center for International Environmental Law (CIEL) 6,26
- Center of Concern⁴
- *Center for International Policy 9,26
- *Center for Popular Democracy ^{9,26}
- *Citizens for Responsibility and Ethics in Washington (CREW) 9,12,26
- Citizens for Tax Justice ⁴
- *Coalition on Human Needs ^{4,9}
- *Color of Change ⁹
- *Congregation of Our Lady of the Good Shepherd, U.S. Provinces ^{6,9,26}
- *Consumer Action 9,26
- *Consumer Federation of America ⁹
- *Corporate Accountability Lab ^{9,26}
- *Crude Accountability ^{9,26}
- *Daily Kos ²⁶
- *DC Dorothy Day Catholic Worker ²⁶
- *Demand Progress 9,26
- *Democrats.com ^{9,26}
- Diakonia 12
- *EarthRights International ⁹
- *Economic Policy Institute 4,6,9,26
- *Environmental Investigation Agency ²⁶
- *ESG Transparency Initiative ⁹
- European Network on Debt and Development (Eurodad) ^{4,12}
- *Fair Share 4,9,26
- *Faith Action Network Washington State ^{6,9,26}
- *Financial Accountability & Corporate Transparency (FACT) Coalition ^{4,5,6,9,11,12}
- *Financial Transparency Coalition 9,12
- *For the Long Term ²⁶
- *Foundation Earth ⁹
- *Friends of the Earth U.S. ^{6,9,26}
- *Fund for Constitutional Government ^{1,8,26}
- *Gender Action 6,9,26
- *Global Alliance for Tax Justice 9,26
- *Global Financial Integrity 4,5,6,9,26
- *Global Justice Program
- Global Witness ⁴
- *Government Accountability Project 9,26
- *Gray Nuns of the Sacred Heart ²⁶
- *Greenpeace USA 6,9,26
- *Health Care for America Now ^{6,9,26}
- *Heartland Initiative ⁹
- The Independent Commission for the Reform of International Corporate Taxation (ICRICT)¹²
- *Institute for Policy Studies Program on Inequality and the Common Good ^{6,9,26}
- *Institute on Taxation and Economic Policy 5,6,9,26
- *International Campaign for Responsible Technology ⁹
- *International Corporate Accountability Roundtable ⁹
- *International Labor Rights Forum ⁹
- *International Rights Advocates ^{9,26}
- *Jobs with Justice ²⁶

- Jubilee East Bay ⁴
- *Jubilee USA Network ^{4,6,9,26}
- Kairos Europe ⁴
- *Liberty Shared 9,26
- *Maryknoll Office for Global Concerns ²⁶
- Methodist Tax Justice Network ⁴
- *Mining Watch Canada 6,9
- *Missionary Oblates ²⁶
- *MomsRising 9,26
- *NAACP ²⁶
- *National Advocacy Center of the Sisters of the Good Shepherd ^{6,9,26}
- *National Employment Law Project 9,26
- *National Organization for Women 6,9,26
- *National Women's Law Center 9
- Natural Resource Governance Institute ¹²
- *NETWORK Lobby for Catholic Social Justice 4,6,9,26
- *New Rules for Global Finance 4,9,26
- *Never Again Coalition ²⁶
- *Open Contracting Partnership 9,26
- *Open the Government ⁹
- *Our Revolution ⁹
- *Oxfam International ^{8,11,12}
- *Oxfam America 4,6,8,26
- *Patriotic Millionaires ^{4,5,6,9,26}
- *Pax Advisory ⁹
- *Peace Education Center 9,26
- *Poligon Education Fund ⁹
- *Progressive Change Institute 9,26
- *Project Blueprint 9,26
- *Project Expedite Justice 9,26
- *Project on Organizing, Development, Education, and Research (PODER)²⁶
- *Public Citizen 4,5,6,9,26
- Publish What You Pay Norway ¹²
- *Publish What You Pay US ^{4,9,26}
- Publish What You Pay Global Council ¹²
- *RESULTS ²⁶
- *Revolving Door Project 6,9,26
- *Rights CoLab ⁹
- *Rights and Accountability in Development (RAID) 9,26
- *RootsAction.org 6,9,26
- *Shadow World Investigations ⁹
- *Strong Economy for All Coalition 9,26

- *Sustentia ⁹
- *Take on Wall Street 5,6,9,26
- *Tax Justice Network 4,9,10,11,26
- *Tax Justice Network Africa 9,26
- Tax Justice Network Norway ⁴
- *Tax Justice Network USA 4,6,9,26
- *Tax March 5,6,9,26
- Tax Research UK ¹¹
- *The Arc of the United States ⁹
- *The Shareholder Commons 9,26
- *The Society of African Missions, Inc. 9
- Transparency International ⁶
- *United Cerebral Palsy National ⁹
- *United Church of Christ, Justice and Witness Ministries ^{9,26}
- *U.S. Public Interest Research Group (PIRG) 4,9,26
- *US-Africa Bridge Building Project ²⁶
- ValueCSR ⁶
- Vienna Institute for International Dialogue and Cooperation (VIDC)⁴
- *Voices for Progress ²⁶
- *Working America ⁹
- *Working Partnerships USA ²⁶

Scholars

- J. Clifton Fleming, Jr., Brigham Young University ²⁰
- Leslie Robinson, Dartmouth College ²⁰
- Daniel Shaviro, New York University ²⁰
- Jeremy Bearer-Friend, New York University ²⁰
- Kimberly Clausing, Reed College ²⁰
- David Hasen, University of Florida ²⁰
- Reuven Avi-Yonah, University of Michigan ²⁰
- Victor Fleischer, University of San Diego ²⁰
- Ed Kleinbard, University of Southern California²⁰
- Omri Marian, University of California at Irvine ²⁰
- Eric Zolt, University of California at Los Angeles ²⁰
- Richard Eccleston, University of Tasmania ¹²
- Lachlan Johnson, University of Tasmania¹²
- Fred Gale, University of Tasmania ¹²
- Hannah Gregory Murphy, University of Tasmania¹²
- Calvin H. Johnson, University of Texas at Austin²⁰
- Jeffery Kadet, University of Washington ²⁰
- Jeffrey Gramlich, Washington State University ²⁰
- Krishen Mehta, Yale University ²⁰

Notes:

1. "Investors Representing More Than \$1Trillion in Assets Under Management Sent A Letter to FASB Supporting Country-by-Country Reporting," FACT Coalition. May 31, 2019. Available at

https://thefactcoalition.org/investors-representing-more-than-1-trillion-in-assets-under-management-sent-a-letter-to-fasb-supporting-country-by-country-reporting/.

2. "Letter From More Than Two Dozen Institutional Investors in Support of the GRI Exposure Draft on "Tax and Payments to Governments," FACT Coalition. March 15, 2019. Available at

https://thefactcoalition.org/letter-from-more-than-two-dozen-institutional-investors-in-support-of-the-gri-exposure-draft-on-tax-and-payments-to-governments/.

3. "Investors Send Letter to the OECD in Support of Country-by-Country Reporting," *FACT Coalition*. March 6, 2020. *Available at* <u>https://thefactcoalition.org/investors-send-letter-to-the-oecd-in-support-of-country-by-country-reporting/</u>.

4. "Letter to FASB from FACT and 26 Other Groups Urging Country-by-Country Reporting," *FACT Coalition*. September 30, 2016. *Available at* https://thefactcoalition.org/letter-fasb-fact-26-groups-urging-country-country-reporting/.

5. "Letter From NGOs in Support of the GRI Exposure Draft on 'Tax and Payments to Governments," FACT Coalition. March 15, 2019. Available at

https://thefactcoalition.org/letter-from-ngos-in-support-of-the-gri-exposure-draft-on-tax-and-payments-to-governments/.

6. "36 Groups Urge World Leaders to Increase Tax Transparency," FACT Coalition. March 6, 2020. Available at

https://thefactcoalition.org/wp-content/uploads/2020/03/NGO-CbCR-Letter-to-OECD-20200306-FINAL.pdf.

7. "Small Business Groups Write Letter to the OECD in Support of Increased Tax Transparency," FACT Coalition. March 6, 2020. Available at

https://thefactcoalition.org/small-business-groups-write-letter-to-the-oecd-in-support-of-increased-tax-transparency/.

8. "Investors Urge Support for Disclosure of Tax Havens and Offshoring Act," FACT Coalition. July 14, 2020.

https://thefactcoalition.org/investors-urge-support-for-disclosure-of-tax-havens-and-offshoring-act/

9. "102 Groups Support Disclosure of Offshoring Act (H.R. 5933)," FACT Coalition, July 13, 2020.

https://thefactcoalition.org/102-groups-tell-congress-support-public-country-by-country-reporting/

10. "First Global Standard for Tax Transparency," GRI, December 5, 2019.

https://www.globalreporting.org/information/news-and-press-center/Pages/First-global-standard-for-tax-transparency.aspx

11. "Backing for GRI's Tax Standard" GRI, December 5, 2019.

https://www.globalreporting.org/information/news-and-press-center/grinews/Pages/Backing-for-GRIs-Tax-Standard.aspx

12. "Strong Backing for Tax Transparency from Investors," GRI, March 28, 2019.

https://www.globalreporting.org/information/news-and-press-center/Pages/tax-transparency-investors.aspx

13. "The Beginning of the End of Tax Secrecy," Wall Street Journal, December 20, 2019.

https://www.wsj.com/articles/the-beginning-of-the-end-of-tax-secrecy-11576837708

14. Remarks by Andy Cale, Vodafone, at "GRI Tax Standard Launch Event," Global Reporting Initiative, January 16, 2020.

https://secure.emincote.com/client/gri/gri001

15. "Rio Tinto Discloses the Details of the \$7.6 Billion Taxes Paid in 2019," Rio Tinto, April 8, 2020.

https://www.riotinto.com/en/news/releases/2020/Rio-Tinto-discloses-taxes-paid-2019

16. "Tax and Transparency," BHP Billiton, 2020.

https://www.bhp.com/our-approach/operating-with-integrity/tax-and-transparency/

17. "Our Latest Tax Reports," Repsol, 2020.

https://www.repsol.com/en/sustainability/responsible-tax-policy/tax-contribution-by-country/index.cshtml

18. Morris Pearl, "How Companies Like Apple Dodge Taxes and Their Own Investors," New York Times, September 21, 2016.

https://www.nytimes.com/2016/09/21/opinion/how-companies-like-apple-dodge-taxes-and-their-own-investors.html

19. "File Reference No. 2016-270: Comments on the Exposure Draft for the Proposed Accounting Standards Update to Income Taxes (Topic 740)," Investor Letter to the Financial Accounting Standards Board (FASB), 2017.

https://www.fasb.org/cs/BlobServer?blobkey=id&blobnocache=true&blobwhere=1175835611714&blobheader=application%2Fpdf&blobheade rname2=Content-Length&blobheadername1=Content-Disposition&blobheadervalue2=507253&blobheadervalue1=filename%3DDISFR_TAX.ED. 051.INDIVIDUAL_INVESTORS_SEE_LISTED.pdf&blobcol=urldata&blobtable=MungoBlobs.

20. Academic Letter to Financial Accounting Standards Board (FASB), November 2017.

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21. "Tax Strategy," ENI.

https://www.eni.com/assets/documents/Tax-strategy_ENG.pdf. See also: https://www.eni.com/en-IT/just-transition/transparency.html. 22. "Small Businesses Seek Increased Competition with Country - by - Country Reporting" *FACT Coalition*, August 4, 2020.

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23. "Small Businesses Back the Disclosure of Tax Havens and Offshore Act" FACT Coalition, July 15, 2020.

https://thefactcoalition.org/small-businesses-support-the-disclosure-of-tax-havens-and-offshore-act-h-r-5933/

24. "U.S. Launch of the Global Reporting Initiative's New Tax Transparency Standard," FACT Coalition, December 5, 2019.

https://thefactcoalition.org/u-s-launch-of-the-global-reporting-initiatives-new-tax-transparency-standard/

25. "Equinox UK Group Tax Strategy November 2019," Equinor, November 2019.

https://www.equinor.com/content/dam/statoil/documents/where-we-are/united-kingdom/equinor-uk-group-tax-strategy-2019.pdf

26. "97 Nonprofit Organizations Support the Disclosure of Tax Havens and Offshoring Act (H.R. 3007 / S. 1545)," FACT Coalition, May 2021. https://thefactcoalition.org/64-investors-with-nearly-2-9-trillion-in-assets-under-management-show-support-for-the-disclosure-of-tax-havens-a nd-offshoring-act/

27. "66 Investors with \$2.9 trillion in Assets Under Management Show Support for the Disclosure of Tax Havens and Offshoring Act," FACT Coalition, May 2021.

https://thefactcoalition.org/64-investors-with-nearly-2-9-trillion-in-assets-under-management-show-support-for-the-disclosure-of-tax-havens-and-offshoring-act/

28. "Small Businesses Seek Increased Competition with Disclosures of Tax Havens and Offshoring Act," FACT Coalition, May 2021. https://thefactcoalition.org/small-businesses-seek-increased-competition-with-disclosures-of-tax-havens-and-offshoring-act/

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