



AS YOU SOW

**UNITED
NATIONS
GLOBAL
COMPACT
COMMUNICATION
ON PROGRESS
MARCH
2019**



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By advocating on behalf of shareholders, *As You Sow* is utilizing the single most powerful path for creating positive, lasting change to achieve our mission and realize a more sustainable world.

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Published in March 2019 by *As You Sow*[®]
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which is available online at www.asyousow.org.*

A letter from our CEO

Thank you for reading *As You Sow's* first United Nations Global Compact (UNGC) Communication on Progress (CoP) report. I'm excited to share our work with you.

In May 2018, *As You Sow* became a signatory to the UNGC because our core work maps closely onto the UNGC principles; we set the goal of working more intentionally toward aligning our programmatic initiatives with the Ten Principles of the UNGC as well as with the UN Sustainable Development Goals (SDGs). We live these principles as an organization, and we push corporations to fulfill them as well.

As You Sow is a non-profit organization that, since 1992, has been a leader in moving corporations to become more responsible on a range of environmental and social issues. Corporate power has become the most dominant force on the planet. To achieve our vision of a safe, just, and sustainable world, we must work with companies, encouraging them to integrate the Ten Principles and SDGs into their policies and practices. By advocating on behalf of shareholders, *As You Sow* utilizes a powerful force for creating positive, lasting corporate change, achieving our mission, and realizing a more sustainable world.

We empower shareholders to change corporations for good. The impacts of increased corporate accountability are felt by investors, customers, at-risk communities, and people of all walks of life as the effects of improved corporate practices ripple through entire supply chains and spread across industries. I'm proud of our record of success and the clear ways in which our work aligns with the Ten Principles and the 17 SDGs.

We produce this CoP report as part of our own governance, particularly because we ask so many corporations to produce reports disclosing material issues. *As You Sow* exercises the same rigor internally as we ask others to do. As environmental, social, and human rights advocates, it is critically important that we walk the walk.

I have worked in many sectors before finding my home at this civil society organization. As an environmental advocate in my private life, I've seen that the ability of individuals to speak their truth to power and to find win-win solutions that incentivizes real change over the long-term is an achievable goal and benefits all stakeholders – including the planet.

As You Sow is committed to producing an annual UNGC CoP. I welcome feedback on our inaugural report. We hope to use our expertise on many critical issues to help the UNGC achieve its goals – truly, all of our goals – for a safe, just, and sustainable world.



Andrew Behar
CEO



About As You Sow

As You Sow is the United States' non-profit leader in shareholder advocacy. Founded in 1992, we harness shareholder power to create lasting change that benefits people, planet, and profit.

We change corporations for good.

Our mission is to promote environmental and social corporate responsibility through shareholder advocacy, coalition building, innovative legal strategies, and online mutual fund transparency tools.

Our vision is a safe, just, and sustainable world in which protecting the environment and human rights is central to corporate decision making.

Corporations are responsible for most of the pressing social and environmental problems we face today. We believe corporations must be a willing part of creating solutions if the solutions are to be effective. We make that happen. As shareholder advocates, we directly engage corporate CEOs, senior management, and institutional investors to change corporations from the inside out.

Shareholders are a powerful force for creating positive, lasting change in corporate behavior.

When corporations focus on the short term and ignore the wider impact of their policies and actions, they create risk for their shareholders, customers, employees, and themselves. As shareholder advocates, we press corporations to understand this broader risk. We work directly with corporate executives to collaboratively develop business policies and practices that reduce risk, benefit brand reputation, and increase the bottom line, while bringing positive environmental and social change.

Ultimately, companies that view the world in years, decades, and generations reduce their risk and improve success. Shareholder advocacy works.

How the UNGC Principles Inform Our Work

As this is our first CoP, in this report we explain our priorities and processes as a civil society (non-profit) organization (CSO) as they relate to the UNGC, as well as specific actions and activities from May 15, 2018 to May 14, 2019.

The UNGC's Ten Principles are central to our work. Our theory of change holds them as a True North on our compass.

As You Sow's Theory of Change

Over the past century, corporate power has become the most dominant force on the planet. According to the World Bank's 2016 report, of the 100 largest economic entities in the world, 69 are corporations and only 31 are countries. Walmart is sandwiched between Canada and Spain at number 10. This concentration of financial resources gives companies vast power and influence over our lives, the environment, civil society, and the state of our planet. We believe that:

- **All companies must be transparent, providing material information to shareholders and all stakeholders including customers, employees, and the communities where they operate.**
- **All companies must have policies and practices to not “dump on the commons,” externalizing the costs of their pollution and negative supply chain impacts. Instead, companies must internalize these costs onto their balance sheets and reflect these costs in the prices of their products.**
- **It is critical for corporate leaders to address the impact of their policies and actions over the long term; not in months and quarters, but in years and decades. By ignoring their long-term impact, companies create risk for themselves and for all stakeholders.**

As shareholder advocates, we communicate directly with corporate executives to collaboratively develop and implement business models that reduce risk, benefit brand reputation, and increase the bottom line, while simultaneously aligning with the Ten Principles to bring positive environmental and social change.

Why shareholder advocacy?

Shareholder advocacy leverages the power of stock ownership in publicly traded companies to promote positive environmental, social, and governance change from within. It provides an avenue through which companies can align their work with the UNGC Ten Principles. Shareholder resolutions are a powerful way to encourage corporate responsibility and discourage practices that are unsustainable or unethical, or that increase companies' exposure to risk. Shareholder resolutions enable a formal communication channel between investors and management that often results in the withdrawal of the resolution through a negotiated dialogue. If agreement is not reached, the resolution is placed on the company's proxy statement, and voted on by all stockholders. Shareholder resolutions are rarely binding, except for when they are specific to limited governance issues, but management is wise to pay attention when a significant number of shareholders express concern by voting “yes” on a resolution.

As *You Sow's* success in creating positive change through shareholder advocacy for the past 27 years is part of a larger body of work by a broad range of organizations. It is now amply demonstrated that companies with strong environmental, social, and governance (ESG) principles tend to be, in general, more profitable. The ESG field includes screening investments with an ESG lens, a practice that collectively overturned Milton Friedman's nearly universally held belief that profit must be the sole focus of companies and that responsibility adversely affects a firm's financial performance. Shareholder advocacy work has resulted in an unprecedented paradigm shift in the behavior of both shareholders and company management that is creating a new environmentally sustainable economy. The Forum for Sustainable and Responsible Investment (US SIF) reported in 2018 that over \$12 trillion now is invested using ESG criteria, shareholder advocacy, and community investing strategies – that's nearly 1 of every 4 investment dollars under professional management.

Bringing the Ten Principles home



Shareholders, strategically working with allies, build a powerful impetus for positive, lasting change in corporate behavior – change that ripples through supply chains and creates lasting systemic change on environmental, social, and governance issues. Twenty-seven years of success gives us confidence that our theory of change is effective and will lead to a just, safe, and sustainable world.

UNGC Principle

Communication on Progress

Human Rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights.

Our Human Rights program, [The Responsible Sourcing Network \(RSN\)](#), is dedicated to ending human rights abuses and forced labor associated with the raw materials found in products we use every day. RSN builds responsible supply chain coalitions of diverse stakeholders including investors, companies, brands, and human rights advocates. Currently, RSN works with network participants to leverage their influence in the areas of conflict minerals from the Democratic Republic of the Congo (DRC) and forced labor in the cotton fields of Central Asia, creating positive change for brands, consumers, and impacted communities.

As an employer of full-time staff and contractors, *As You Sow* makes employment decisions on the basis of merit and business needs. *As You Sow* is an equal opportunity employer and abides by principles of diversity, equity, and inclusion. We actively seek to recruit and retain a diverse staff in all areas of operations. *As You Sow* does not unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), gender identity or expression, national origin, ancestry, age, physical or mental disability, legally protected medical condition, family care status, veteran status, marital status, sexual orientation or identification, or any other basis protected by law.

Principle 2

Businesses should make sure that they are not complicit in human rights abuses.

In order to implement Principle 2, we engage with senior management or escalate to filing a shareholder resolution at companies that refuse to disclose information related to slavery in their supply chains, companies that do not have diversity on their board of directors, companies with egregious pay policies, and companies that score poorly in the area of gender equality.

Principle 2 (continued)

In order to implement Principle 2, we engage with senior management or escalate to filing a shareholder resolution at companies that refuse to disclose information related to slavery in their supply chains, companies that do not have diversity on their board of directors, companies with egregious pay policies, and companies that score poorly in the area of gender equality. Typically, such companies earn very low scores on our allies' scorecards, such as [Know the Chain](#) and the [Corporate Human Rights Benchmark](#).

We cover a variety of human rights issues in our annual [Proxy Preview](#) report, such as gender and minority pay equity, working conditions, diversity in the workplace, LGBTQ rights, gun violence, conflict zones, immigration and the penal system, prison labor, human trafficking, hate speech, and content governance.

As part of *As You Sow's* Invest Your Values work, we host platforms to help investors to understand how the companies in various mutual funds are performing in the areas of [Climate Change](#), [Gender Equality](#), [Weapons](#), and [Deforestation](#), all of which include human rights impacts.

RSN's [program work on conflict minerals](#) publishes the annual report [Mining the Disclosures](#), the authoritative reference on companies' activities and Dodd-Frank Section 1502 conflict minerals mandated disclosures. We establish best practices and benchmark companies by sector on their activities to address the human rights impacts of tin, tungsten, tantalum, and gold originating in the DRC and neighboring countries.

Since 2007, [RSN's cotton program](#) has been working to end the forced mobilization of children and adults in the cotton fields of Uzbekistan. Recently, RSN has also highlighted a similar abuse in Turkmenistan for brands and investors. Both governments mobilize their countries' teachers, nurses, military personal, and civil servants, sending them to the fields to harvest cotton. They can be harassed, fired, or lose benefits if they don't fulfill their daily quotas. In addition to publishing various reports on cotton supply chains linked to these abuses, and engaging companies and investors on actions they can take through signing and supporting company pledges, RSN has been researching and developing a verification for cotton yarn spinners on the due diligence of their materials management called [YESS: Yarn Ethically & Sustainably Sourced](#).

Labor

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

While this is not one of our areas of direct advocacy, we actively support allied organizations working on the freedom of association and the right to collective bargaining by publishing their actions in our annual [Proxy Preview](#) report, which we have been publishing since 2006.

We publish and regularly update the *As You Sow Employee Handbook*, in which we detail our employment policies. Employment at *As You Sow* is at will.

Principle 4

Businesses should uphold the elimination of all forms of forced and compulsory labour.

As described above in our response to Principle 2, we file shareholder resolutions with companies that do not disclose their supply chain information regarding forced and compulsory labor. We challenge these companies to provide material, or relevant, disclosures and work in direct engagement with senior management to address their impact on or connection to these abuses.

RSN's cotton program creates market pressure on the perpetrators of modern slavery abuses by engaging and coordinating actions of brands and retailers. Over 300 companies have signed RSN's Cotton Pledges (one for Uzbekistan and one for Turkmenistan), promising to not knowingly source cotton harvested with forced labor. RSN's YESS initiative will train yarn spinners on how to avoid slave-harvested cotton, which will enable Cotton Pledge signatories to pivot from "not knowingly sourcing" tainted cotton to "knowing, and not sourcing."

We recently completed a report, [Investing to End Modern Slavery](#), which is comprised of a landscape assessment, roadmap, and case studies. The report looks at cross-sector slavery hotspots around the globe and gives guidance on how investors can apply pressure to eliminate modern slavery. The report aims to inform a broad coalition of investor advocates, and to contribute to the [Investor Alliance for Human Rights](#), an initiative in which we participate actively.

Principle 5

Businesses should uphold the effective abolition of child labour.

Forced and child labor is distressingly prevalent in many countries, but nowhere has it been more organized than in Uzbekistan and Turkmenistan, where the governments collectively forced over one million children, some as young as seven years old, to labor in cotton fields every year.

Starting in 2007, we asked companies to use their economic leverage to push the Uzbek government to put an end to forced child labor. Today, we are

Principle 5 (continued)

pleased to say that forced child labor in Uzbekistan has almost completely been eliminated. Unfortunately, this abuse has just been transferred to the forced mobilization of adults in Uzbekistan and Turkmenistan.

Although the YESS initiative will initially focus on removing cotton harvested with forced labor from the global textile supply chain, in the future, we would also like to include the elimination of cotton harvested with the worst forms of child labor.

As You Sow will not use forced or child labor in our work and we make every effort possible to ensure that it is not used in any products that we purchase at our offices.

Uzbekistan

The Uzbek government uses local government officials to mobilize hundreds of thousands of workers against their will to harvest cotton every year. The government dictates the price of inputs like seeds and fertilizers, controls irrigation, tells farmers what to plant and when to plant it, and determines the purchase price of goods. If the farmers don't do what they are told, their land could be confiscated. Due to our work and that of our allies, this abusive practice, a relic of Uzbekistan's Soviet past, is starting to transition, but the centrally controlled systemic nature of the forced labor abuse still needs to be fully dismantled.

Turkmenistan

Each cotton season, Turkmen public sector workers are forced by the government to fulfill cotton picking quotas. In addition, private businesses are forced to contribute to the efforts with their own labor or financially by hiring replacement workers. To fulfill the quotas, parents often have to recruit their children's help, despite national and international laws against forced and child labor. Every year, the harvest leaves schools, businesses, and health institutions understaffed or closed, placing a huge burden on the health, education, and general well-being of Turkmen citizens. The Turkmen government, known as one of the most repressive in the world, detains and tortures human rights defenders seeking to monitor the harvests.

Our Solutions

RSN is co-founder of the Cotton Campaign, a coalition of CSOs, business, trade unions and investor organizations that has been using a variety of political and economic tools and strategies to pressure the governments of Uzbekistan and Turkmenistan to end their continuous and systematic human rights violations.

At *As You Sow*, we leverage our unique position as a sustainable, responsible, and impact (SRI) investor and as a CSO to ensure major apparel brands and retailers are not sourcing cotton from Uzbekistan or Turkmenistan until their governments stop exploiting unwilling citizens during their cotton harvests.

To achieve this goal, we are implementing solutions that will further collaboration, transparency, traceability, and accountability. RSN hosts two Cotton Pledge campaigns for companies to sign committing to not use Uzbek and Turkmen cotton. We recently launched the initiative YESS: Yarn Ethically and Sustainably Sourced to drive slavery out of cotton production by implementing a due diligence verification program with cotton yarn spinners.

Our efforts and those in our network are succeeding. The Uzbek government has stopped sending the youngest children, those ages 7 - 14, to the cotton fields on a massive scale. Now we aim to stop the forced labor of older students and adults throughout the cotton fields of Uzbekistan and Turkmenistan.

We are pleased to say in just this past year, Uzbek public officials have become willing to negotiate with the Cotton Campaign. The Turkmen government has not yet been willing to commence a dialogue with us.

UNGC Principle

Principle 6

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Communication on Progress

Our annual [Proxy Preview](#) report highlights the work of our allies focused on employment discrimination. We address this issue directly in several ways. Our [Gender Equality Funds](#) website specifically examines 4,000 companies' policies and practices on gender equality. This research includes equal pay for equal work, sexual harassment, gender discrimination in recruiting and training, and a host of other key performance indicators.

At *As You Sow*, we have a strong policy for hiring at our organization. We recently undertook Diversity, Equity, and Inclusion (DEI) training, which evolved into an active DEI committee shaping ongoing training and programming for staff and board members.

We document our commitment to non-discrimination in employment in our Employee Handbook, most recently updated in October 2017 and scheduled for another update in April 2019. Our policy prohibiting discrimination,

Principle 6 (continued)

harassment, and retaliation ensures that we strictly prohibit discrimination and harassment of any kind, including discrimination and harassment on the basis of race, color, religion, citizenship, political activity or affiliation, marital status, age, national origin, ancestry, physical or mental disability, medical condition (as defined under California law), veteran status, sexual orientation, sex or gender (which includes harassment and discrimination based on gender identity, pregnancy, childbirth, or related medical conditions), taking or requesting statutorily protected leave, or any other characteristics protected under federal, state, or local laws. In particular, we call attention to verbal, physical, and visual harassment, as well as two distinct forms of sexual harassment: quid pro quo and a hostile environment. We provide clear reporting and investigation procedures to all employees.

Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges.

As You Sow's core philosophy supports the precautionary principle. It underlies nearly all our initiatives. An example was our work on [nanomaterials in food](#).

Nanotechnology is the science of manipulating matter at the molecular scale to build structures, tools, or products. This emerging science offered new opportunities for food industry applications, such as stronger flavorings and colorings. However, at such a small scale, nanoparticles are more likely to pass through biological membranes, circulate through the body, and enter cells, potentially causing harm as they move through the body.

The introduction of nanotechnology into the food industry raised significant concerns for both consumers and investors. The risks and benefits of this emerging technology are still being discovered and there is a disconcerting lack of scientific studies on the effects that nanomaterials have on human health and the environment. Due to the food industry's lack of transparency on the issue, concrete information about whether, and to what extent, nanomaterials are being used in food products was difficult to obtain.

The precautionary principle informed our approach to this issue: we published reports and raised concerns about use of nanomaterials with the food industry before many of the major companies even realized that their suppliers were beginning to use them.

For example, we found nano titanium dioxide in Dunkin' Brands' powdered sugar and presented our findings to the company. Dunkin' denied its existence. We pressed the issue through shareholder advocacy and a media campaign. Soon thereafter, Dunkin' made a no-nano pledge, and Starbucks

Principle 7 (continued)

and McDonald's soon followed suit.

We also use the precautionary principle in our litigation practice. When we find carcinogens and reproductive toxicants in consumer products, we file notices under California's Proposition 65, the Safe Drinking Water and Toxic Enforcement Act. These cases lead to reformulation or labeling for foods and everyday products like cosmetics and cleaning supplies.

We also apply the precautionary principle to our work on climate change. We filed the first-ever shareholder resolution on Carbon Asset Risk, through which we asked companies to evaluate and publicly provide a risk assessment to shareholders on the potential that the oil and gas reserves on their balance sheet might become stranded if climate change forced them to keep these reserves underground and to address the regulatory and consumer risks of a rapidly decarbonizing economy.

The precautionary principle applies to our work on antibiotics in factory farms, the pre-harvest use of pesticides like glyphosate that are everywhere in our food system, and the obscene use of plastics in packaging that are choking our waterways and destroying our ocean ecosystems.

We believe that the precautionary principle should be adopted by U.S. regulators, as it is in the EU. It will increase public safety and put the burden of proof that a product is safe on the manufacturer prior to release to the general public.

Eliminating Ocean Plastics

Our work on ocean plastics has resulted in several major achievements. Single-use plastics like product packaging, straws, and beverage containers are the major source of ocean plastics. In 2018 alone, we secured six major victories:

- McDonald's agreed to recycle ALL post-consumer packaging in ALL restaurants by 2025, an audacious goal
- McDonald's also pledged to eliminate its use of polystyrene foam globally by the end of 2018
- Starbucks pledged to eliminate its billion-a-year single-use plastic straw usage by 2020 and announced a \$10 million investment in designing a paper cup that can be recycled or composted globally
- Dunkin' Brands set a target date of 2020 for replacing foam cups with paper
- KraftHeinz announced it will make 100% of its packaging recyclable, reusable, or compostable by 2025
- Mondelez similarly announced it would make all its packaging recyclable by 2025 and committed to eliminate 143 million pounds of packaging by 2020

Principle 8

Businesses should undertake initiatives to promote greater environmental responsibility.

Our commitment to encourage businesses to promote greater environmental responsibility is at the core of our work. We actively engage an average of 50 companies every year on this issue.

Many of our engagements with corporations escalate to a shareholder resolution filing that formalizes the process and brings the issue to the attention of other shareholders, management, boards, and the public. The proposal process also brings media attention and can ensure that an issue comes to a vote at the company's annual meeting. Examples of what we've asked for through shareholder resolutions includes:

- increased transparency on material environmental issues;
- the elimination of single-use plastic and non-recyclable packaging;
- the elimination of antibiotics in meat;
- the end of pre-harvest desiccants on crops;
- a transition to Paris Agreement-compliant greenhouse gas emissions;
- a transition of power utilities away from coal to renewables;
- and attention to the potential harms of hydraulic fracturing to groundwater, communities, natural habitat, and the atmosphere into which companies emit fugitive methane and other greenhouse gases.

Within *As You Sow*, we are guided in our own business practices by our commitment to environmental justice and responsibility. We have strict restrictions on accepting funding from corporations; we use only second-hand or recycled furniture in our office; we make purchasing decisions to eliminate or reduce plastics; we encourage employees to bike or use public transportation to work (or drive EVs); we prohibit any employee from accepting corporate gifts from consistent violators of environmental and/or social justice laws, major producers or vendors of products that are unusually damaging to the environment, or major antagonists of environmental and social justice organizations. We also monitor and reduce, or buy credits for, travel-related greenhouse gas emissions.

Transitioning Away from Fossil Fuels

- Our flagship climate change effort focuses on transitioning companies and utilities away from fossil fuels along the timeline necessary to help ensure that the Paris goals of maintaining global temperatures well below 2°C, and thus avoiding climate catastrophe, are achieved. We are pressing oil and gas companies to develop the logistics of transitioning to thrive in a climate-constrained world. Our objective is to exert continuous pressure on energy companies, many of which are currently the largest contributors to global warming, to take meaningful action. This transition planning evolved from our work on carbon asset risk, which helped establish in both financial and mainstream communities the concept that significant fossil fuel assets likely will be stranded as a result of climate change.

Principle 9

Businesses should encourage the development and diffusion of environmentally friendly technologies.

As You Sow publishes a report every six months called [The Carbon Clean 200](#), also known as the Clean200. The premise of the report is that there is incredible opportunity for investors to shift their capital into environmentally friendly and clean energy technologies. We analyze companies from around the world and identify the 200 top companies that are investing in or otherwise producing “green” or clean products. We published the most recent issue on February 18, 2019, measuring companies from 27 countries across a wide range of sectors. We track this index against a global benchmark.

We encourage all companies with which we engage to develop their own recycling systems appropriate for their sector. For example, we successfully encouraged HP, Dell, Apple, and Best Buy to agree to start electronic waste (e-waste) recycling for consumers. This effort has resulted in the collection of 500 tons of e-waste every year, stopping the leaching of toxins into water and air. We encourage utility companies to transition to renewables and pipeline companies to stop methane leaks.

Through our work to support California’s Proposition 65, the Safe Drinking Water and Toxic Enforcement Act, we also encourage companies to reduce toxins in their products by looking at their manufacturing and technology in their factories.

Responsible Antibiotic Use

We continue to drive strong commitments for responsible antibiotic use by putting pressure on the meat supply chain. Factory farm antibiotic practices are a major contributor to the rise of antibiotic-resistant superbugs. With most major manufacturers agreeing to limit or avoid the use of medically important antibiotics, and KFC, Wendy’s, and Burger King all agreeing to not buy poultry raised with medically important antibiotics, we have successfully altered the poultry industry; we are now focusing on beef and pork. In 2018:

- Sanderson Farms announced it will eliminate the use of medically important antibiotics in its poultry operations. This company vehemently denied the science; it is the third-largest chicken producer in the U.S. and the only major chicken company that had not taken action.
- McDonald’s announced a policy to dramatically reduce the use of medically important antibiotics in a large segment of the beef it uses. McDonald’s is the largest purchaser of beef in the U.S. and the first major fast food chain to take action; its commitment has transformational implications for the beef industry and for public health.

Principle 10

Businesses should work against all forms of corruption, including extortion and bribery.

We work with many allies to reduce corporate political spending that we see as a form of corruption and bribery. We feature this work in our [Proxy Preview](#) report every year. We have filed shareholder resolutions on lobbying and political spending at companies including DowDupont and Pinnacle West. We also publish an annual report, [The 100 Most Overpaid CEOs of the S&P 500](#), calling out the corrupt and egregiously out-of-balance corporate compensation system in the United States. We track 100 companies and how large asset owners vote on the CEO pay packages.

As You Sow does not engage in lobbying or make political donations.

Get in touch!

As You Sow welcomes feedback on our progress as a signatory to the UNGC.

Please contact us at
info@asyousow.org.

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