



**Office of Commissioner of
Insurance and Safety Fire**

Protect | Enforce | Educate | Inform

JOHN F. KING

*Commissioner of Insurance
and Safety Fire*

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West Tower, Suite 702
Atlanta, Georgia 30334

April 6, 2023

Gary Retelny
President and CEO
Institutional Shareholder Services, Inc.
1177 Avenue of the Americas, 14th Floor
New York, New York 10036 USA

Kevin Cameron
Executive Chairman
Glass, Lewis & Co.
255 California Street, Suite 1100
San Francisco, CA 94111

Dear Mr. Retelny and Mr. Cameron,

As the State of Georgia's Commissioner of Insurance, it is my mission to protect consumers by providing access to vital insurance products through fair regulation that creates economic opportunities for all Georgians. However, it has recently come to my attention that your company supports shareholder proposals to haphazardly impose unfair climate and social mandates on insurers, undermining the ability of state-based insurance regulators to protect their consumers. Enacting these mandates would have a profoundly negative effect on insurance companies, insurance regulators, and, most concerningly, the citizens of Georgia.

Insurance regulations are crafted with considerable deliberation and precision to ensure insurance products are quality, affordable, and non-discriminatory. Such regulations exempt companies from collecting race and ethnicity data from consumers that may otherwise be applied in often inscrutable manners to unfairly deny coverage. In other words, companies are required to assess and insure an individual's risk and not the individual's immutable attributes. Further, consumer protection laws are not made in isolation; each state is a member of the National Association of Insurance Commissioners (NAIC), an organization which helps to coordinate interstate learning, consistency, and implementation of insurance laws. Insurance professionals from a variety of backgrounds come together at the NAIC to create a fundamental framework that regulates the industry across the United States, while still allowing individual states flexibility over their markets.

Georgia is a major hub for agriculture and transportation, two industries that would be devastated by new activist shareholder-driven climate and social mandates on insurers. The agricultural industry contributes more than \$73 billion to the Georgia economy, with the state being a leading producer in poultry, peanuts, and wood resources. Our state is home to the world's busiest airport, Hartsfield-Jackson, and the Port of Savannah, which is responsible for moving at least 11% of the nation's international shipping containers. Shareholders with a proclivity towards climate-related proposals will be able to hold millions of Georgians hostage, including farmers, airline workers, and port employees. These sectors are already heavily regulated, and special laws have been put into effect that balance economic output and environmental impact.

Many Insurance Commissioners are elected officials, chosen by and responsible to the citizens of their state. Shareholders are ultimately responsible to themselves and will retain oligarchical power over insurance companies should this politically charged policy succeed. I ask that you rescind your support of imposing these mandates upon insurers and return regulatory authority to where it belongs.

Sincerely,



John F. King
Georgia Commissioner of Insurance and Safety Fire

cc: Chairman Gary Gensler
Security Exchange Commission

Representative Mike Collins
United States House of Representatives

President Chlora Lindley-Myers
National Association of Insurance Commissioners

Acting Chief Executive Officer Andrew Beal
National Association of Insurance Commissioners