

### SAGE:

Sustainability Achieved Through Greater Engagement

### Calvert SAGE Strategies:

emphasize strategic engagement to advance environmental, social, and governance (ESG) performance on the part of companies that may not meet all of Calvert's Signature\* ESG criteria today but have the potential to improve.

## Comcast Corporation

This company is a Calvert SAGE™ Strategy holding in the Calvert Large Cap Value Fund and is not eligible for investment in the Calvert Signature™ Funds.

Comcast Corporation has demonstrated a commitment to addressing sustainability in its business operations with its recently published corporate responsibility report. The report provides information on the company's environmental, social, and governance practices. While this is an important first step, the company needs to show how it is integrating sustainability into its overall business by enhancing its disclosure to include performance metrics, concrete goals and objectives, and the communication of challenges as well as achievements. Comcast's commitments to diversity and community relations have earned broad recognition and continue to represent areas of strategic opportunity. In stark contrast, Comcast has a history of labor relations disputes, including allegations of anti-union tactics and mandatory overtime. The company's code of ethics does not address the International Labour Organization (ILO) core labor standards, especially collective bargaining and freedom of association, nor is there evidence of any joint labor management initiatives or safety performance data disclosure. Comcast also has a history of weak corporate governance, particularly regarding executive compensation practices, ownership control issues, and board accountability. To date, the company has not fully addressed or resolved these challenges.

### COMCAST ADVOCACY OBJECTIVES

- Improve overall sustainability disclosure, including reporting per the Global Reporting Initiative's G3 guidelines. Enhance disclosure of performance metrics, including communication of challenges and even problems, as well as achievements. Supplement diversity reporting to include full disclosure of Equal Employment Opportunity-1 data to demonstrate how effectively women and minorities are advancing throughout the company.
- Adopt all ILO core labor standards, especially collective bargaining and freedom of association. Provide training to employees and management regarding labor policies and local, state, and federal regulations to ensure a neutral space for employees to decide whether to form or join a union.
- Adopt a shareholder "Say on Pay" policy that gives shareholders the opportunity at each annual meeting to cast an advisory vote on executive compensation.
- Strengthen compensation policies and practices to make them consistent with leading governance standards, including ensuring the Compensation Committee is free of directors with material related-party transactions and other potential conflicts.
- Adopt governance policies or practices that allow for greater accountability to shareholders, including separating the roles of Chair and CEO and formally engaging shareholders to enhance and facilitate communication.
- Disclose a corporate policy and contributions on political spending using corporate funds, including those made to trade associations, civic leagues, welfare organizations, local associations of employees, and other tax-exempt organizations.
- Report on the company's Internet network management practices in the context of concerns regarding privacy and freedom of expression.

\*Calvert's Signature ESG criteria examine corporate performance across seven broad areas of concern: governance and ethics, environment, workplace, product safety and impact, human rights, Indigenous Peoples' rights, and community relations. For more information, please visit <http://www.calvert.com/sri-signature-criteria.html>.



## ENGAGEMENT TOOLS APPLIED

- Direct dialogue with Comcast executive management
- Multi-stakeholder dialogue(s)
- Sign-on letters on specific objectives

## RECENT ENGAGEMENT

- On May 6, Calvert joined a Comcast Executive Vice President and Senior Vice President, Investor Relations at Comcast's Philadelphia headquarters for an initial discussion to review the objectives set forth in Calvert's Large Cap Value/SAGE Strategy introduction letter and establish a path for continued engagement. Calvert reviewed each of the objectives, answering specific questions and providing a greater understanding of each objective's relevance and importance to Calvert as investors. Comcast took the opportunity to brief Calvert on each of these key areas, highlighting what the company is currently doing, and where they are open to continued dialogue. The meeting was productive and set the stage for a constructive dialogue on the majority of the issues identified in our initial SAGE letter, including labor relations, executive compensation, political contributions, and privacy.
- Comcast recently published their corporate responsibility report, demonstrating increased transparency on several key areas. Calvert intends to follow up soon to respond to the report and to move the dialogue forward.

As of 7/31/2009, securities of Comcast represented 1.84% of the Calvert Large Cap Value Fund.

Investment in mutual funds involves risk, including possible loss of principal invested. You could lose money on your investment in the Fund, or the Fund could underperform, because of the following risks: a) the stock market may decline in value, b) the individual stocks in the Fund may not perform as well as expected, and/or c) the Fund's portfolio management practices may not work to achieve their desired result.

The market may not recognize a security's intrinsic value for a long time, and a stock judged to be undervalued by the Fund's Advisor may actually be appropriately priced.

Large cap companies may be unable to respond quickly to new competitive challenges such as changes in technology, and also may not be able to attain the high growth rate of successful smaller companies, especially during extended periods of economic expansion.

*For more information on any Calvert Fund, please contact your financial advisor, call Calvert at **800.368.2748** or visit [www.calvert.com](http://www.calvert.com) for a free prospectus. An institutional investor should call Calvert at **800.327.2109**. An investor should consider the investment objectives, risks, charges and expenses of an investment carefully before investing. The prospectus contains this and other information. Read it carefully before you invest or send money.*

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