

Socially and Environmentally Responsible Practices Survey

Navellier & Associates

Please note: As part of our commitment to an open and transparent government, your completed survey will be posted in its entirety in electronic format on Treasury’s Web site at <http://www.patreasury.org>,

A. Women and Ethnic Minority Query

Firm Practices

1. Please detail the employee diversification of your firm, emphasizing executive and management positions that have decision-making responsibilities. Count each employee only once, except owners may be counted both as owners and employees if the owner has significant operational responsibilities. If s/he has multiple roles, count the employee in the category where s/he spends the most time.

Position	Ethnic Minority	Women	Female Minority	Other	Total
Owners (and % ownership)	0	1 (13%)	0	7 (87%)	8
Executive Management (e.g. CEO, COO, CCO VP, Directors)	0	1	0	5	6
Investment Decision makers (portfolio managers, traders, etc.)	0	0	0	7	7
Investment Professionals (analysts, etc.)	0	1	0	1	2
All other FTE	0	11	3	9	23
TOTAL*	0	13	3	22	38

*Employees double-counted in table are only counted one time in TOTAL row.

2. Please describe relevant initiatives and/or policies that assist in recruiting women and minorities to your firm and retaining and promoting those employees in your firm.

Navellier is an equal opportunity employer and maintains an EEO Policy signed by the firm’s founder and CEO, Louis G. Navellier.

Vendors and Subcontractors

3. What percentage of your trades utilizes minority/women-owned brokerage firms?

Navellier uses minority/women brokerage firms for 15-20% of the firm’s trades.

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4. Do you consider women and minority ownership or makeup when hiring vendors/sub-contractors, consultants, advisors or other professional services? If so, how? If not, please explain why you do not.

Navellier uses women and minority owned firms for brokerage services. However, as a smaller firm in the money management business, Navellier's remaining third-party vendors and subcontractors relationships are the firm's CPA, proxy voting firm, and performance verification firm. Navellier uses industry leaders and nationally known firms for these services. If Navellier needs to hire vendors/subcontractors, consultants, advisors, or other professional services providers we try to ensure the organization(s) under consideration are compliant with all equal opportunity regulations.

5. Please provide any other information you feel may be relevant or may help Treasury understand your approach to employee and vendor/subcontractor diversification.

B. Environmental/Sustainability Query

Firm Practices

1. Please provide information related to your firm's policy/initiatives/efforts with respect to environmentally responsible and sustainable practices.

As a knowledge-based investment services company, Navellier has focused on its environmental impact largely in the area of Information Technology (IT). The IT Department has the largest impact on the firm's carbon footprint, and Navellier has implemented specific strategies to reduce waste and energy consumption.

The IT Department attempts to be a zero waste department. Navellier's objective is that nothing is ever sent to the landfill; all obsolete equipment, including servers, work stations, printers, and even cell phones, are delivered to recycling services. All computer monitors have been replaced with energy efficient flat screens, which also produce less heat. All waste paper products are shredded and recycled. Hard copy files have been reduced to a minimum, and 90% of legacy hard copy files have been scanned and stored in electronic formats. Navellier has completely refurbished the firm's server room with a new and efficient HVAC along with more efficient servers that produce less heat.

Vendors and Subcontractors

2. Do you consider the environmental or sustainable practices of vendors and subcontractors in hiring decisions? If so, how? If not, please explain why you do not.

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Navellier has reduced its carbon footprint by going paperless several years ago, and more recently, has migrated away from using in-house servers that consumed large amounts of electricity and going to cloud computing. As a smaller firm in the money management business, Navellier does not have contracts with vendors and subcontractors that impact the environment. If we need to hire vendors and subcontractors, we seek hiring firms that believe in the environment and sustainable practices.

Investment Decisions

3. Do you consider environmental / sustainability issues when making investment decisions? If so, how? If not, please explain why you do not.

Navellier has integrated Audit Integrity, via FactSet, into the firm's stock selection system. Audit Integrity's research has shown that companies that are good corporate citizens have higher returns. Audit Integrity quantitatively scores the integrity of companies' reported financial statements and corporate behavior through an Accounting and Governance Risk rating (AGR).

4. Are there specific sectors or industries that you are likely to over or underweight due to climate risk or opportunity? If so, which ones?

Navellier does not prefer or exclude industries or sectors. Using the firm's disciplined investment process, Navellier always searches for leading stocks in leading industry groups. However, upon client request, Navellier can exclude specific stocks or industry groups from the client's portfolio.

5. How do you obtain information about climate risk and environmental factors?

Navellier has integrated Audit Integrity, via FactSet, into the firm's stock selection system. Audit Integrity's research has shown that companies that are good corporate citizens have higher returns. Audit Integrity quantitatively scores the integrity of companies' reported financial statements and corporate behavior through an Accounting and Governance Risk rating (AGR).

6. Have you adopted the United Nations Principles for Responsible Investing? (<http://www.unpri.org/>). If not, are you in the process of evaluating, or would you consider evaluating adoption of the United Nations Principles for Responsible Investing?

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Navellier offers many investment products that are designed to fit into specific investment strategies that are typically developed by consultants for their clients. These products range from Large Cap Growth models to Small Cap Value models. Each of these models can be modified for clients that wish to use an Environmental, Social and Governance (ESG) overlay or constraint on the underlying model. For those clients that request ESG constraints, Navellier uses Risk Metrics' (formerly KLD Research & Analytics) tools to modify the portfolios to adhere to the investment mandate of the those clients.

Upon client request, Navellier is willing to consider adoption of the United Nations Principles for Responsible Investing.

Please detail any other information you feel may be relevant or helpful for Treasury to understand your approach to evaluating the significance of environmental and sustainability issues in making investment decisions.

C. Pennsylvania Commitment Query

Please provide numbers detailing the firm and client presence in Pennsylvania.

	PA	Total
Headquarters	0	1
Offices	0	1
Employees	2	38
Clients HQ in PA	4	

Please detail any other information you think relevant regarding the extent of your business contacts or activities in Pennsylvania.

D. Geopolitical Risk

1. How do you take geopolitical risk into account when making investment decisions? If so, how? If not, please explain why you do not.

Navellier's Large Cap Growth Portfolio, in which the Pennsylvania Treasury TAP is invested, invests in U.S. securities. Up to 10% of the portfolio's market value can be invested in ADRs. As a result, geopolitical risk is not applicable.

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2. Do you currently have in place policies that prohibit or limit investment in companies doing business with countries identified as state sponsors of terrorism by the U.S. State Department? If so, please provide those policies.

Navellier has several clients that have requested their portfolios not invest in companies that do business with certain countries. Navellier purchases research from Risk Metrics (formerly KLD Research & Analytics) of companies that meet these criteria, and these companies are restricted from being purchased in the clients' portfolios.