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DIVERSITY SELF-ASSESSMENT OF FDIC REGULATED FINANCIAL INSTITUTIONS

ESTIMATED REPORTING BURDEN

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The Federal Deposit Insurance Corporation (FDIC) provides this self-assessment instrument in support of the *Interagency Policy Statement Establishing Joint Standards for Assessing Diversity Policies and Practices of Regulated Entities* dated June 10, 2015. Pursuant to the Policy Statement, a self-assessment is voluntary. However, financial institutions conducting self-assessment of their diversity policies and practices against the Standards contained in the Policy Statement may use this instrument or its own assessment tool.

The FDIC may use information submitted by financial institutions to monitor progress and trends in the financial services industry with regard to diversity and inclusion in employment and contracting activities. This information may also be used to identify and highlight successful policies and practices. The FDIC may publish leading practices, in any form that does not identify a particular organization, financial institution or individual, and does not disclose any confidential business information or trade secrets. The FDIC will treat the information as *confidential* to the extent permitted by law and will not disclose it unless required by law.

The FDIC will continue to reach out to financial organizations, financial institutions, other federal financial regulators, and other interested parties to discuss diversity and inclusion in the financial services industry and share leading practices.

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SECTION II - ASSESSMENT OF THE FINANCIAL INSTITUTION'S DIVERSITY POLICIES AND PRACTICES

1. Organizational Commitment to Diversity and Inclusion

The leadership of an organization with successful diversity policies and practices demonstrates its commitment to diversity and inclusion. Leadership comes from the governing body, such as a board of directors, as well as senior officials and those managing the organization on a day-to-day basis. These Standards inform how a financial institution promotes diversity and inclusion in both employment and contracting and how it fosters a corporate culture that embraces diversity and inclusion.

Standards	Yes/No	Activities that support Program Success or Program Challenges			
In a manner reflective of the individual financial institution's size and other characteristics,					
1.1 The financial institution includes diversity and inclusion considerations in both employment and contracting as an important part of its strategic plan for recruiting, hiring, retention, and promotion.					
1.2 The financial institution has a diversity and inclusion policy that is approved and supported by senior leadership, including senior management and the board of directors.					
1.3 The financial institution provides regular progress reports to the board and senior management.					
1.4 The financial institution regularly conducts training and provides educational opportunities on equal employment opportunity and on diversity and inclusion.					
1.5 The financial institution has a senior level official, preferably with knowledge of and experience in diversity and inclusion policies and practices, who oversees and directs the financial institution's diversity and inclusion efforts.					
1.6 The financial institution takes proactive steps to promote a diverse pool of candidates, including women and minorities, in its hiring, recruiting, retention, and promotion, as well as in its selection of board members, senior management, and other senior leadership positions.					

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2. Workforce Profile and Employment Practices

Many financial institutions promote the fair inclusion of minorities and women in their workforce by publicizing employment opportunities, creating relationships with minority and women professional organizations and educational institutions, creating a culture that values the contribution of all employees, and encouraging a focus on these objectives when evaluating the performance of managers. Financial institutions with successful diversity and inclusion programs also regularly evaluate their programs and identify areas to be improved.

Standards	Yes/No	Activities that support Program Success or Program Challenges
In a manner reflective of the individual financial institution's size ar	nd other chara	acteristics,
2.1 The financial institution implements policies and practices related to workforce diversity and inclusion in a manner that complies with all applicable laws.		
2.2 The financial institution ensures equal employment opportunities for all employees and applicants for employment and does not engage in unlawful employment discrimination based on gender, race, or ethnicity.		
2.3 The financial institution has policies and practices that create copportunities that may include:	liverse applic	ant pools for both internal and external
2.3(a) Outreach to minority and women organizations.		
2.3(b) Outreach to educational institutions serving significant minority and women student populations.		
2.3(c) Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.		
2.4 The financial institution uses both quantitative and qualitative measurements to assess its workforce diversity and inclusion efforts. These efforts may be reflected, for example, in applicant tracking, hiring, promotions, separations (voluntary and involuntary), career development, and retention across all levels and occupations of the financial institution, including the executive and managerial ranks.		
2.5 The financial institution holds management at all levels accountable for diversity and inclusion efforts, for example, by ensuring that such efforts align with business strategies and individual performance plans.		

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3. Procurement and Business Practices - Supplier Diversity

Companies increasingly understand the competitive advantage of having a broad selection of available suppliers to choose from with respect to factors such as price, quality, attention to detail, and future relationship building. A number of financial institutions have achieved success at expanding available business options by increasing outreach to minority-owned and women-owned businesses. As in the employment context, financial institutions often use metrics to identify the baseline of how much they spend procuring and contracting for goods and services, how much they spend with minority-owned and women-owned businesses, and the availability of relevant minority-owned and women-owned businesses, as well as changes over time. Similarly, financial institutions may use outreach to inform minority-owned and women-owned businesses (and affinity groups representing these constituencies) of these opportunities and of the procurement process. In addition, financial institutions' prime contractors often use subcontractors to fulfill the obligations of various contracts. The use of minority-owned and women-owned businesses as subcontractors provides valuable opportunities for both the minority-owned and women-owned businesses and the prime contractor. Financial institutions may encourage the use of minority-owned and women-owned subcontractors by incorporating this objective in their business contracts.

Standards	Yes/No	Activities that support Program Success or Program Challenges
In a manner reflective of the individual financial institution's size ar	d other chara	acteristics,
3.1 The financial institution has a supplier diversity policy that provides for a fair opportunity for minority-owned and women-owned businesses to compete for procurement of business goods and services. This includes contracts of all types, including contracts for the issuance or guarantee of any debt, equity, or security, the sale of assets, the management of the financial institution's assets, and the development of the financial institution's equity investments.		
3.2 The financial institution has methods to evaluate its supplier di	versity, which	may include metrics and analysis related to:
3.2(a) Annual Procurement Spending.		
3.2(b) Percentage of contract dollars awarded to minority-owned and women-owned businesses by race, ethnicity, and gender.		
3.2(c) Percentage of contracts with minority-owned and women-owned business subcontractors.		
3.3 The financial institution has practices to promote a diverse sup	plier pool. wh	nich mav include:
3.3(a) Outreach to minority-owned and women-owned contractors and representative organizations.	, - p /	
3.3(b) Participation in conferences, workshops, and other events to attract minority-owned and women-owned firms and inform them of contracting opportunities.		
3.3(c) An ongoing process to publicize its procurement opportunities.		

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4. Practice to Promote Transparency of Organizational Diversity and Inclusion

Transparency and publicity are important aspects of assessing diversity policies and practices. Greater awareness and transparency give the public information to assess those policies and practices. Financial institutions publicize information about their diversity and inclusion efforts through normal business methods, which include displaying information on their websites, in their promotional materials, and in their annual reports to shareholders, if applicable. By making public a financial institution's commitment to diversity and inclusion, its plans for achieving diversity and inclusion, and the metrics it uses to measure success in both workplace and supplier diversity, a financial institution informs a broad constituency of investors, employees, potential employees, suppliers, customers, and the general community about its efforts. The publication of this information can make new markets accessible for minorities and women and illustrate the progress made toward an important business goal.

Standards	Yes/No	Activities that support Program Success or Program Challenges
In a manner reflective of the individual financial institution's size an respect to its diversity and inclusion activities by making the follow or other appropriate communication methods.	nd other chara ing informatio	acteristics, the financial institution is transparent with on available to the public annually through its website
4.1 The financial institution publicizes its diversity and inclusion strategic plan.		
4.2 The financial institution publicizes its policy on its commitment to diversity and inclusion.		
4.3 The financial institution is transparent about its progress toward achieving diversity and inclusion in its workforce and procurement activities, which may include the financial institution's current workforce and supplier demographic profiles.		
4.4 The financial institution publicizes its opportunities to promote	diversity whi	ch may include:
4.4(a) Current employment and procurement opportunities.	uiversity, will	or may include.
4.4(b) Forecasts of potential employment and procurement opportunities.		
4.4(c) The availability and use of mentorship and developmental programs for employees and contractors.		

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5. Financial Institutions' Self-Assessment

Financial institutions that have successful diversity policies and practices allocate time and resources to monitoring and evaluating performance under their diversity policies and practices on an ongoing basis. Financial institutions are encouraged to disclose their diversity policies and practices, as well as information related to their assessments, to the FDIC and the public.

Standards	;					Yes	'No	Activities that support Program Success or Progra Challenges				or Program
In a manner reflective of the individual financial institution's size and other characteristics,												
	nancial insti olicies and		ucts an asse nnually.	essment	t of its							
5.2 The financial institution monitors and evaluates its performance under its diversity policies and practices on an ongoing basis.												
			shes informa es and pract		rtaining to	its						
SECTION	I III - DIVE	PSITY D	ΔΤΔ									
SECTION	VIII - DIVL	KOIII D	117		Work	force Dref	ilo					
	Workforce Profile 1. What are the numbers and percentages of women and minorities in the financial institution's total workforce for the period covered by this assessment?					riod						
Total Worl		Women #	Women %	Men #	Men %	Minorities #	# M	inorities %	Non-Minor	Non-Minorities # Non-Mi		inorities %
			0.0%		0.0%			0.0%	0.00		0.0%	
2. What are the numbers and percentages of women and minorities in the financial institution's Executive/Senior Level Officials and Managers job category for the period covered by this assessment?					Officials and							
Total Man	agement #	Women #	Women %	Men #	Men %	Minorities #	# M	linorities % Non-Minorities # Non-N		Non-Mi	inorities %	
			0.0%		0.0%			0.0%				0.0%
			rcentages o	f wome	n and mind	orities of the	finan	ncial institu	tion's Board of	Directors	s for the	e period
	y this asses		NA/= 0/	NA //	NA = == 0/	N 4:	,	::+: 0/	Nian Minani	:+: //	NI NA	::t: 0/
Total Board	Members #	vvomen #	Women %	Men #	Men %	Minorities #	‡ M	inorities %	Non-Minor	Non-Minorities # Non-Minori		inorities %
			0.0%		0.0%			0.0%		0.0		0.0%
						t - Supplier						
									by this assess	sment wit	th mino	rity and
Total Spend \$	Women Owned Spend \$	Women Owned		en wned	Minority Owned	Minority Owned Spend %	Minor	rity- and N	Minority- and Women-Owned		0	lon-Minority Owned Spend%

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SECTION IV - ADDITIONAL INFORMATION	

Other information or comments the financial institution deems important regarding its assessment of its diversity policies and practices: