



DIVERSITY ASSESSMENT REPORT FOR ENTITIES REGULATED BY THE SEC

The U.S. Securities and Exchange Commission (SEC) provides the Diversity Assessment Report to entities regulated by the SEC in support of the [Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies](#) (Joint Standards) issued by the federal financial regulatory agencies through an interagency policy statement dated June 10, 2015.

The Diversity Assessment Report is designed to guide and inform a regulated entity's self-assessment of its diversity policies and practices using the Joint Standards. It also provides the regulated entity with a template for submitting diversity self-assessment information to the OMWI Director at the SEC, as contemplated under the Joint Standards.

The Joint Standards address a regulated entity's U.S. operations. Use of the Joint Standards by a regulated entity is voluntary, as are conducting a self-assessment, and submitting diversity self-assessment information to the SEC.

The Joint Standards reflect leading policies and practices for advancing workforce and supplier diversity. They are intended to be applied in a manner appropriate to the regulated entity's unique characteristics, such as workforce size, governance structure, total assets, and geographic location. Some standards may not be applicable to every regulated entity. Accordingly, the SEC recognizes that the responses provided in the Diversity Assessment Report reflect the regulated entity's unique characteristics.

Use of Information by the SEC

The information collected from Diversity Assessment Reports will be aggregated and used in reports such as the OMWI Annual Report to Congress.

The information may also be used to identify and highlight successful policies and practices. The SEC may publish leading diversity practices in a form that does not identify a particular entity or disclose confidential business information.

Confidential Treatment Request

Entities submitting information considered sensitive and confidential business information may request confidential treatment of the information in accordance with the [SEC procedures](#) under the Freedom of Information Act (17 CFR 200.83), and the SEC will keep the information confidential to the extent allowed by law.

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average ten (10) hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: David Bottom, Director/Chief Information Officer, Securities and Exchange Commission, c/o Cynthia Roscoe, 100 F Street NE., Washington, DC 20549, or send an email to PRA_Mailbox@sec.gov, and include "SEC File No. 270-664—OMWI Diversity Assessment Report" in the subject line of the message.

SECTION I: FIRM INFORMATION

Firm Name _____ Total Number of Employees _____

Address _____

City _____ State _____ Zip _____

Website _____

Type of Registration (Check All That Apply)

- ☐ Broker-Dealer
- ☐ Investment Adviser
- ☐ Investment Company (Mutual Fund)
- ☐ Transfer Agent
- ☐ Municipal Advisor
- ☐ Private Fund Adviser
- ☐ Clearing Agency
- ☐ Nationally Recognized Statistical Rating Organization
- ☐ National Securities Exchange
- ☐ Other Self-Regulatory Organization (such as, the Financial Industry Regulatory Authority and Securities Rulemaking Board)

Point of Contact for this Report (POC) _____

Title _____ Email _____

Phone _____

Diversity and Inclusion Officer or Equivalent _____

☐ Same as POC

Title _____ Email _____

Phone _____

Business Diversity Officer or Equivalent _____

☐ Same as POC

Title _____ Email _____

Phone _____

Diversity and Inclusion Webpage _____

SECTION II: ASSESSMENT OF DIVERSITY POLICIES AND PRACTICES

1. Organizational Commitment to Diversity and Inclusion

The leadership of a firm 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 regulated entity on a day-to-day basis.

In a manner reflective of its size and other characteristics,	Yes	Comments
1.1 The firm has a written diversity and inclusion policy that is approved and supported by the chief executive officer or other senior level official.	☐	
1.2 A senior level official with experience in diversity and inclusion policies and practices oversees and directs the firm's diversity and inclusion efforts.	☐	
1.3 The firm includes diversity and inclusion considerations as part of its strategic plan for recruiting, hiring, retaining, and promoting employees.	☐	
1.4 The firm includes diversity and inclusion considerations as part of its strategic plan for recruiting, hiring, retaining, and promoting executive and senior level officials and managers.	☐	
1.5 The firm includes diversity and inclusion considerations as part of its strategic plan for recruiting and selecting members of the board of directors or other governing body.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
1.6 The firm includes diversity and inclusion considerations as part of its strategic plan for contracting with vendors and suppliers.	☐	
1.7 The firm takes proactive steps to promote a diverse pool of candidates when:		
1.7(a) Selecting executive and senior level officials and managers.	☐	
1.7(b) Selecting members of the board of directors or other governing body.	☐	
1.8 The firm regularly offers training and educational opportunities on equal employment opportunity and diversity and inclusion.	☐	
1.9 The firm provides regular progress reports on diversity and inclusion efforts to the board of directors or other governing body.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
1.10 The firm takes diversity and inclusion into consideration when making strategic planning and governance decisions.	☐	

The Joint Standards reference minorities and women, but do not preclude a firm from using a broader definition of diversity. If your firm uses a broader definition, such as including individuals with disabilities, veterans, or lesbian/gay/bisexual/transgender individuals, please describe.

Please describe any other ways in which your firm demonstrates its organizational commitment to diversity and inclusion.

2. Implementation of Employment Practices to Promote Workforce Diversity and Inclusion

Many firms proactively promote diversity and the fair inclusion of minorities and women in their workforces. Firms with successful diversity and inclusion programs also regularly evaluate their programs and identify areas to be improved.

In a manner reflective of its size and other characteristics,	Yes	Comments
2.1. The firm implements policies and practices that create or foster diverse applicant pools for employment opportunities. These practices may include:	☐	
2.1(a) Outreach to minority and women organizations.	☐	
2.1(b) Outreach to educational institutions serving significant or predominantly minority and women student populations.	☐	
2.1(c) Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.	☐	
2.1(d) Communication of employment opportunities through media predominately serving minorities and women.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
2.2 The firm regularly evaluates performance under its workforce diversity and inclusion programs.	☐	
2.3 The firm uses quantitative measures to assess the effectiveness of its diversity and inclusion efforts in its employment activities (e.g., hires, promotions, separations, career development, and retention).	☐	
2.4 The firm uses qualitative measures (e.g., surveys) to assess the effectiveness of its diversity and inclusion efforts in its employment activities.	☐	
2.5 The firm holds management at all levels accountable for diversity and inclusion efforts, for example by assuring these efforts align with business strategies or individual performance plans.	☐	

Please describe any other actions the firm takes to promote workforce diversity and inclusion.

Please describe practices that have been most successful in advancing workforce diversity and inclusion.

3. Procurement and Business Practices—Business Diversity¹

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. Many firms have successfully expanded available business options by increasing outreach to minority-owned and women-owned businesses. The use of minority-owned and women-owned businesses as subcontractors also provides valuable opportunities for both the minority-owned and women-owned businesses and the prime contractors.

In a manner reflective of its size and other characteristics,	Yes	Comments
3.1 The firm has a business diversity policy that is aimed at providing business opportunities to diverse suppliers, including minority-owned and women-owned businesses.	☐	
3.2 The firm has policies and practices that provide minority-owned and women-owned businesses an opportunity to enter into agreements for:		
3.2(a) The issuance of or guarantee of any debt, equity, or security.	☐	

¹ The term “business diversity” has been substituted for “supplier diversity” to reflect that programs also cover businesses providing professional services.

In a manner reflective of its size and other characteristics,	Yes	Comments
3.2(b) The sale of assets.	☐	
3.2(c) The management of the entity's assets.	☐	
3.2(d) The development of the entity's equity investments.	☐	
3.3 The firm takes steps to promote a pool of diverse businesses. These steps may include:	☐	
3.3(a) Conducting outreach to minority-owned and women-owned businesses and representative organizations.	☐	
3.3(b) Participating in conferences, workshops, and other events to attract minority-owned and women-owned businesses and inform them of contracting opportunities.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
3.3(c) Maintaining a list of qualified minority-owned and women-owned businesses that may compete for upcoming contracting opportunities.	☐	
3.3(d) Having an ongoing process to publicize its procurement opportunities.	☐	
3.4 The firm has established methods to evaluate its business diversity efforts. These methods may include metrics and analytics related to:	☐	
3.4(a) The annual amount spent purchasing goods and services.	☐	
3.4(b) The annual amount spent with minority-owned and women-owned businesses by gender, race, and ethnicity.	☐	
3.4(c) The percentage of the annual amount spent with minority-owned and women-owned businesses by gender, race, and ethnicity, as compared to the total annual amount spent purchasing goods and services.	☐	

Please describe practices that have been most successful in advancing supplier diversity objectives.

4. Practices to Promote Transparency of Organizational Diversity and Inclusion

Transparency and publicity are important aspects of assessing diversity policies and practices. By making public a regulated entity'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 business diversity, a regulated entity informs a broad constituency of investors, employees, potential employees, business, customers, and the general community about its efforts.

In a manner reflective of its size and other characteristics,	Yes	Comments
4.1 The firm publishes information about its diversity and inclusion efforts. This includes publica-tions on:	☐	
4.1(a) Internal platforms.	☐	
4.1(b) Website.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
4.2 The firm publishes on its website or otherwise makes public information regarding its diversity and inclusion efforts. The published information may include:	☐	
4.2(a) The firm's diversity and inclusion strategic plan.	☐	
4.2(b) The firm's policy on its commitment to diversity and inclusion.	☐	
4.2(c) Information about the firm's progress toward achieving diversity and inclusion in its workforce, including the demographic profile of the firm's workforce.	☐	
4.2(d) Information about the firm's progress toward achieving its business goals.	☐	
4.2(e) Information about the demographic composition of the firm's board of directors or other governing body.	☐	

In a manner reflective of its size and other characteristics,	Yes	Comments
4.2(f) Information on partnerships and sponsorships with diverse organizations.	☐	
4.3 The firm publicizes opportunities that promote diversity and inclusion on its website. The opportunities may include:	☐	
4.3(a) Employment and internship opportunities.	☐	
4.3(b) Contracting opportunities.	☐	
4.3 (c) Developmental programs for potential vendors and suppliers.	☐	

Please describe any other tools your firm has found useful in promoting transparency of organizational diversity and inclusion.

5. Self-Assessment of Diversity Policies and Practices

Firms that have successful diversity policies and practices devote time and resources to monitoring and evaluating performance under their diversity policies and practices on an ongoing basis. Firms regulated by the SEC are encouraged to disclose their diversity policies and practices, as well as information related to their assessments, to the SEC and the public.

In a manner reflective of its size and other characteristics,	Yes	Comments
5.1 The firm monitors and evaluates performance under its diversity policies and practices on an ongoing basis.	☐	
5.2 The firm uses the Joint Standards to conduct an assessment of the firm's diversity policies and practices annually.	☐	
5.3 The firm publishes information pertaining to its assessment of its diversity policies and practices.	☐	

SECTION III: DIVERSITY DATA

1. What is the demographic composition of the firm's workforce and management, as reported on the most recent EEO-1 Report?²

	TOTAL	GENDER		RACE AND ETHNICITY						
		Men	Women	Hispanic or Latino	Not Hispanic or Latino					
					White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or More Races
All Employees										
Executive/Senior Level Officials and Managers										
First/Mid-Level Officials and Managers										

² Section III of the Diversity Assessment Report requests workforce demographic data using the same categories for race and ethnicity that the EEOC adopted for the EEO-1 Report, and are consistent with the minimum standards for maintaining, collecting and presenting data on race and ethnicity prescribed by the Office of Management and Budget. See Revised Standards for the Classification of Federal Data on Race and Ethnicity, 62 FR 5872 (October 30, 1997).

2. What is the demographic composition of the firm's board of directors or other governing body for the period covered by this assessment?

	TOTAL	GENDER		RACE AND ETHNICITY						
				Hispanic or Latino	Not Hispanic or Latino					
					White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or More Races
Board of Directors or Other Governing Body										

3. Procurement—Business Diversity

What was the total procurement spend with minority-owned and women-owned businesses for the period covered by this assessment compared to the total procurement spend with all vendors and suppliers?

	Dollar Amount	Percent of Total
Total Spend		
Minority-Owned Businesses		
Women-Owned Businesses		