



# DIVERSITY SELF-ASSESSMENT TOOL FOR ENTITIES REGULATED BY THE SEC

The U.S. Securities and Exchange Commission (SEC) provides the Diversity Self-Assessment Tool (formerly "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 Joint Standards address a regulated entity's U.S. operations and reflect leading profiles and practices for advancing workforce and supplier diversity.

The Diversity Self-Assessment Tool 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 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 Self-Assessment Tool reflect the regulated entity's unique characteristics.

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.

## Use of Information by the SEC

Upon consent, the names of specific entities that submit a Diversity Self-Assessment Tool may be published in reports such as the OMWI Annual Reports to Congress, as well as other reports presenting aggregated data from Diversity Self-Assessment Tool submissions. Those reports may also identify and highlight successful policies and practices and use other information collected from the Diversity Self-Assessment Tool.

In the reports, all information collected from a Diversity Self-Assessment Tool, including successful policies and practices, will be aggregated in a form that does not identify a particular entity or disclose confidential business information.

## Confidential Treatment Request

Entities submitting confidential commercial or financial information that may exempt under the Freedom of Information of Act may follow the [SEC's procedures](#) for requesting confidential treatment of information (17 CFR 200.83), and the SEC will keep the information confidential consistent with existing law.

## SECTION I: FIRM INFORMATION

Firm Name  Total Number of Employees

Address

City  State  Zip

Web Address/URL (Home)

Web Address/URL (Diversity and Inclusion)

### Type of Registration (Check All That Apply)

- |   |   |
|---|---|
| <input type="checkbox"/> Broker-Dealer      | <input type="checkbox"/> Private Fund Adviser   |
| <input type="checkbox"/> Investment Adviser | <input type="checkbox"/> Clearing Agency  |
| <input type="checkbox"/> Investment Company | <input type="checkbox"/> Nationally Recognized Statistical Rating Organization  |
| <input type="checkbox"/> Transfer Agent     | <input type="checkbox"/> National Securities Exchange   |
| <input type="checkbox"/> Municipal Advisor  | <input type="checkbox"/> Other Self-Regulatory Organization<br><small>(e.g., the Financial Industry Regulatory Authority and the Municipal and Securities Rulemaking Board)</small> |

**Point of Contact** (POC)

Title  Email

Phone

**Chief Diversity Officer or Equivalent**

Same as POC

Title  Email

Phone

**Business Diversity Officer or Equivalent**

Same as POC

Title  Email

Phone

- May the SEC publish the name of this firm as having submitted a Diversity Self-Assessment Tool?  Yes
- Information collected from the Diversity Self-Assessment Tool will be aggregated in a form that does not identify a particular entity or disclose confidential business information, as noted in "Use of Information by the SEC."  No

## 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 senior leadership, including senior management and the board of directors.	<input type="checkbox"/>	
1.2 The firm has a senior level official, preferably with experience in diversity and inclusion policies and practices, who oversees and directs the firm's diversity and inclusion efforts.	<input type="checkbox"/>	
1.3 The firm includes diversity and inclusion considerations in both employment and contracting as part of its strategic plan for training and educational opportunities, recruiting, hiring, retention, and promotion at all levels of the organization.	<input type="checkbox"/>	
1.4 The firm takes proactive steps to promote a diverse pool of candidates, including women and minorities, in its hiring, recruiting, retention, and promotions, as well as in its selection of board members, senior management, and other senior leadership positions.	<input type="checkbox"/>	

In a manner reflective of its size and other characteristics,	Yes	Comments
1.5 The firm provides regular progress reports on diversity and inclusion efforts to the board of directors or other governing body and senior management.	<input type="checkbox"/>	

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 both internal and external opportunities that may include:	<input type="checkbox"/>	
2.1(a) Outreach to minority and women organizations.	<input type="checkbox"/>	
2.1(b) Outreach to educational institutions serving significant or predominantly minority and women student populations.	<input type="checkbox"/>	
2.1(c) Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.	<input type="checkbox"/>	

In a manner reflective of its size and other characteristics,	Yes	Comments
2.2 The firm uses quantitative and qualitative measurements to assess its workforce diversity and inclusion efforts. These efforts may be reflected in, for example, applicant tracking, hiring, promotions, separations (voluntary and involuntary), career development, and retention across all levels and occupations of the firm, including the executive and managerial ranks.	<input type="checkbox"/>	
2.3 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.	<input type="checkbox"/>	

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 Diversity<sup>1</sup>

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 provides for a fair opportunity for minority-owned and women-owned businesses to compete for the procurement of business goods and services. This includes contracts of all types, including contracts relating to investment advisory, retirement, brokerage, or other financial services.	<input type="checkbox"/>	
3.2 The firm has practices to promote a diverse supplier pool, which may include:	<input type="checkbox"/>	
3.2(a) Conducting outreach to minority-owned and women-owned businesses and representative organizations.	<input type="checkbox"/>	

<sup>1</sup> The term "business diversity" has been substituted for "supplier diversity" to reflect that programs cover not only businesses providing goods, but also services.

In a manner reflective of its size and other characteristics,	Yes	Comments
3.2(b) Participating in conferences, workshops, and other events that are designed to attract minority-owned and women-owned businesses and inform them of contracting opportunities.	<input type="checkbox"/>	
3.2(c) Having an ongoing process to publicize its procurement opportunities.	<input type="checkbox"/>	
3.3 The firm has methods to evaluate its business diversity efforts which may include metrics and analytics related to:	<input type="checkbox"/>	
3.3(a) Annual procurement spending.	<input type="checkbox"/>	
3.3(b) Percentage of contracting dollars awarded to minority-owned and women-owned businesses by gender, race, and ethnicity.	<input type="checkbox"/>	
3.3(c) The percentage of the annual amount spent with minority-owned and women-owned business subcontractors and/or service providers.	<input type="checkbox"/>	



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 publicizes its diversity and inclusion strategic plan.	<input type="checkbox"/>	
4.2 The firm publicizes its commitment to diversity and inclusion.	<input type="checkbox"/>	
4.3 The firm publicizes its progress toward achieving diversity and inclusion in its workforce and procurement activities, which may include the firm's current workforce and supplier demographic profiles.	<input type="checkbox"/>	
4.4 The firm publicizes its opportunities to promote diversity and inclusion, which may include:	<input type="checkbox"/>	
4.4(a) Current and potential future employment activities and future procurement opportunities.	<input type="checkbox"/>	

In a manner reflective of its size and other characteristics,	Yes	Comments
4.4 (b) The availability and use of mentorship and developmental programs for employees and contractors.	<input type="checkbox"/>	

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.	<input type="checkbox"/>	
5.2 The firm uses the Joint Standards to conduct an assessment of the firm's diversity policies and practices annually.	<input type="checkbox"/>	
5.3 The firm publishes information pertaining to its assessment of its diversity policies and practices.	<input type="checkbox"/>	

### 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?<sup>2</sup>

	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										

<sup>2</sup> Section III of the Diversity Self-Assessment Tool 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). However, firms may provide demographic information in any manner and are not limited to the identification categories listed on the EEO-1 Report (e.g. non-binary, LGBTQ+, person with disability).

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 IDENTITY				DEMOGRAPHIC BACKGROUND								
		Men	Women	Non-Binary	Did Not Disclose	African American or Black	Alaskan Native or Native American	Asian	Hispanic or Latinx	Native Hawaiian or Pacific Islander	White	Two or More Races or Ethnicities	LGBTQ+	Did Not Disclose
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		