

TO: [rule-comments@sec.gov](mailto:rule-comments@sec.gov).

RE: Support of Nasdaq diversity proposal file Number for the rule SR-NASDAQ-2020-081 in PDF

December 14, 2020

Vanessa Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

Dear Vanessa Countryman,

Our company's core value is a commitment to increasing diversity and inclusion. Diverse is invaluable to an organization, performance, and community. We believe it is critical to support companies and organizations that share our core values/mission. Accordingly, we offer our support for Nasdaq's new proposed rules for the following reasons:

- We believe that Nasdaq's diversity proposal is in the public's interest and will enhance corporate governance, board decision-making, investor protections, and investor confidence.
- We acknowledge Nasdaq in recognizing that there is no one-size-fits-all approach to board diversity. We believe that the flexibility that Nasdaq is giving to companies to explain why they do not meet the minimum objective of two diverse directors is reasonable.
- We commend Nasdaq for providing companies with the opportunity to increase board diversity through a disclosure-based, business-driven approach rather than a quota. We do not believe Nasdaq's requirements will be overly burdensome or coercive.
- We recognize that implementing Nasdaq's changes may take time. Therefore, we applaud Nasdaq for implementing a phase-in period for companies to adhere to the new listing standards.
- We believe that Nasdaq's proposed definition of diversity will improve transparency and comparability of disclosures across companies, whereas a broader definition would maintain the status quo of inconsistent, non-comparable data.
- We believe Nasdaq's proposal will help make meaningful progress in improving board diversity related to race, ethnicity, sexual orientation, and gender identity.
- We are encouraged that Nasdaq's proposal will lead to more of our members, most of whom are highly qualified and distinguished in their fields, getting appointments on corporate boards.

Regards,  
Faye Sahai  
Partner, Mirai Global

San Francisco, CA US