



Diversity Assessment Report for Entities Regulated by the SEC

The U.S. Securities and Exchange Commission (SEC) provides the Diversity Assessment Report to complement the *Final Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Entities Regulated by the Agencies* (Joint Standards) issued by the U.S. Securities and Exchange Commission and five other Federal financial regulatory agencies on June 10, 2015. (80 FR 33016) ([Release No. 34-75050](#); [File No. S7-10-15](#)).

The Diversity Assessment Report is designed to: (1) help guide a regulated entity's self-assessment of its diversity policies and practices using the Joint Standards; and (2) provide the regulated entity with a template for submitting diversity assessment information to the OMWI Director at the SEC, as contemplated under the Joint Standards.¹

The Joint Standards are intended to 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 of diversity policies and practices, and submitting diversity assessment information to the SEC.

The Joint Standards, which reflect leading policies and practices for advancing workforce and supplier diversity, 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 size and other characteristics.

Use of Information by the SEC

The SEC may use the information submitted in the Diversity Assessment Report to identify which policies and practices reflected in the Joint Standards have been adopted by SEC-regulated entities, and to highlight diversity policies and practices that have been successful. The SEC may publish information collected from Diversity Assessment Reports in the OMWI Annual Report to Congress, but will *not* publish any information that identifies a particular regulated entity or discloses confidential business information.

Regulated entities submitting information considered sensitive and confidential business information may request confidential treatment of the information in accordance with the [SEC's 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.

¹ The Diversity Assessment Report is primarily intended for regulated entities with more than 100 employees. These entities are required by Title VII of the Civil Rights Act of 1964 to collect data on employment diversity and file an Employer Information Report (EEO-1 Report) with the Equal Employment Opportunity Commission (EEOC). EEO-1 Report data may assist in evaluating and assessing practices related to workforce diversity and inclusion and may be used to complete Section II of the Diversity Assessment Report.



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Firm Name: **Total Number of Employees:**

Address:

City: **State:** **Zip:**

Website:

Description of Regulated Entity (check all that apply):

- Brokers-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 Municipal Securities Rulemaking Board)

Name of Contact Person:

Title:

E-mail: **Phone:**

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: Pamela Dyson, Chief Information Officer, Securities and Exchange Commission, c/o Remi Pavlik-Simon, 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.



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Section I: Assessment of Diversity Policies and Practices

A. 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.

1. The firm demonstrates its organizational commitment to diversity and inclusion in the following ways:

	Yes	Comments
1.1. The firm has a written diversity and inclusion policy.		
1.2. The firm’s written diversity and inclusion policy is approved and supported by the chief executive officer or other senior level official.		
1.3. A senior level official with experience in diversity and inclusion policies and practices oversees and directs the firm’s diversity and inclusion efforts.		
1.4. The firm includes diversity and inclusion considerations as part of its strategic plan for recruiting, hiring, retaining, and promoting employees.		
1.5. The firm includes diversity and inclusion considerations as part of its strategic plan for contracting with vendors and suppliers.		
1.6. The firm takes proactive steps to promote a diverse pool of candidates when selecting executive and senior level officials.		
1.7. The firm takes proactive steps to promote a diverse pool of candidates when 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.		

2. 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.

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

B. 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.

1. The firm promotes workforce diversity and inclusion in the following ways:

	Yes	Comments
1.1. The firm engages in outreach to minority and women organizations.		
1.2. The firm engages in outreach to educational institutions serving significant or predominantly minority and women student populations.		
1.3. The firm participates in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.		
1.4. The firm communicates employment opportunities through media predominately serving minorities and women.		
1.5. The firm regularly evaluates performance under its workforce diversity and inclusion programs.		
1.6. The firm uses quantitative measures to assess the effectiveness of its workforce diversity and inclusion efforts in its employment activities (e.g., hires, promotions, separations, career development, and retention).		
1.7. The firm uses qualitative measures (e.g., surveys) to assess the effectiveness of its workforce diversity and inclusion efforts in its employment activities.		
1.8. The firm includes diversity and inclusion objectives in performance plans of its managers.		

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

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

C. Consideration of Supplier Diversity in Procurement and Business Practices

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.

	Yes	Comments
1. The firm has a supplier diversity policy.		
2. The firm’s supplier diversity policy is aimed at providing business opportunities to diverse suppliers, including minority-owned and women-owned businesses.		

3. The firm takes specific steps to promote a diverse supplier pool, including:

	Yes	Comments
3.1. The firm conducts outreach to minority-owned and women-owned contractors.		
3.2. The firm conducts outreach to minority and women organizations or affinity groups.		
3.3. The firm participates in conferences, workshops, and other events to attract minority-owned and women-owned businesses and informs them of contracting opportunities.		
3.4. The firm maintains a list of qualified minority-owned and women-owned businesses that may compete for upcoming contracting opportunities.		
3.5. The firm has an ongoing process to publicize its procurement opportunities.		
3.6. The firm publicizes its procurement opportunities in media primarily serving minorities and women.		

4. The firm measures the following attributes of its supplier diversity:

	Yes	Comments
4.1. The amount spent annually for procuring and contracting for goods and services.		
4.2. The percentage of contract dollars awarded to minority-owned and women-owned businesses by gender, race, and ethnicity.		
4.3. The percentage of contracts with minority-owned and women-owned business subcontractors.		

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

D. 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 supplier diversity, a regulated entity informs a broad constituency of investors, employees, potential employees, suppliers, customers, and the general community about its efforts.

	Yes	Comments
1. The firm publishes information about its diversity and inclusion efforts on its web site:		

2. The firm publishes the following information regarding its diversity and inclusion efforts on its website:

	Yes	Comments
2.1. The firm's diversity and inclusion strategic plan.		
2.2. The firm's policy on its commitment to diversity and inclusion.		
2.3. The firm's progress toward achieving diversity and inclusion in its workforce.		
2.4. The firm's progress toward achieving diversity and inclusion in its procurement activities.		

3. The firm publicizes opportunities that promote diversity and inclusion on its website, including:

	Yes	Comments
3.1. Employment and internship opportunities.		
3.2. Contracting opportunities.		
3.3. Mentorship and developmental programs for employees.		
3.4. Developmental programs for potential contractors.		

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

E. Evaluation 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.

1. The firm takes steps to advance diversity and inclusion that include:

	Yes	Comments
1.1. Monitoring and evaluating performance under its diversity policies and practices on an ongoing basis.		
1.2. Using the Joint Standards to conduct an assessment of the firm's diversity policies and practices annually.		
1.3. Publishing information pertaining to its assessment of its diversity policies and practices.		



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Section II: Diversity Profile of Regulated Entity

A. Demographic Composition of Workforce² (as reported on the most recent EEO-1 Report)

EEO-1 Job Categories	Gender		Race and Ethnicity						
	Male (%)	Female (%)	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 (%)
Executive/Senior Level Officials and Managers									
First/Mid-Level Officials and Managers									
Professionals									
Technicians									
Administrative Support Workers									
All others									

B. Supplier Diversity by Percentage of Contracting Dollars (most recent calendar year)

Of the firm's total annual procurement spend with all vendors and suppliers for the period covered by this assessment, please provide the percentage with minority-owned and women-owned businesses compared to the total procurement spend with all vendors and suppliers.

TOTAL Amount (\$)	Minority-Owned Businesses						Women-Owned Businesses (%)	All Other Businesses (%)
	Hispanic or Latino (%)	Black or African American (%)	Native Hawaiian or Other Pacific Islander (%)	Asian (%)	American Indian or Alaska Native (%)	Two or more races (%)		

² Section II 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).