



## Diversity Assessment Report for Entities Regulated by the SEC

### **INSTRUCTIONS**

This Diversity Assessment Report is intended for use with the *Final Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of the 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 Joint Standards implement a requirement under Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, 12 U.S.C. 5452, that the Director of the Office of Minority and Women Inclusion (OMWI) at each agency develop standards for assessing the diversity policies and practices of the entities regulated by the agency. The Joint Standards do not create new legal obligations. Use of the Joint Standards by a regulated entity is voluntary. The SEC will not use its examination process in connection with the Joint Standards.

The Diversity Assessment Report is designed to: (1) guide and inform an entity's self-assessment of its diversity policies and practices; and (2) provide a means by which a regulated entity may submit information pertaining to its diversity assessments to the OMWI Director at the SEC. The questions below reflect the leading policies and practices for advancing workforce and supplier diversity that are identified in the Joint Standards.

#### **1. WHO CAN SUBMIT**

Entities regulated by the SEC are encouraged, but not required, to complete and submit the Diversity Assessment Report. This includes broker-dealers, investment advisers, investment companies, transfer agents, municipal advisors, private fund advisers, clearing agencies, nationally recognized statistical organizations, national securities exchanges, and other self-regulatory organizations (such as, the Financial Industry Regulatory Authority or the Municipal Securities Rulemaking Board). The Diversity Assessment Report is primarily intended for regulated entities with more than 100 employees.<sup>1</sup> However, regulated entities of any size may complete and submit the Diversity Assessment Report.

#### **2. HOW AND WHAT TO SUBMIT**

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<sup>1</sup> This number was based upon the requirements for filing an Employer Information Report (EEO-1 Report) with the Equal Employment Opportunity Commission (EEOC). Private employers with 100 or more employees and federal contractors and first-tier subcontractors with 50 or more employees that have a contract or subcontract of \$50,000 or more, or serve as depository of Government funds in any amount, are required by Title VII of the Civil Rights Act of 1964 to collect data on employment diversity and file an EEO-1 Report with the EEOC.

The Diversity Assessment Report and any supporting documents should be submitted electronically through the SEC's web-based system. Instructions for electronic submission are found at \_\_\_\_\_.

As to the diversity profile data requested in Section III, for workforce diversity, provide data reported on the EEO-1 Report for the current calendar year. For supplier diversity, provide data for the current calendar year.

### **3. WHEN TO SUBMIT**

The Diversity Assessment Report should be completed and submitted by January 31.

### **4. CONFIDENTIALITY**

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.

### **5. USE OF INFORMATION**

The SEC will aggregate this information for monitoring progress and trends, and to highlight successful diversity policies and practices, primarily in the SEC's annual OMWI Congressional Report. The SEC will *not* publish diversity and inclusion information that identifies any particular regulated entity unless the regulated entity consents in writing to such use. If a regulated entity agrees to allow disclosure of its Diversity Assessment Report and the information it contains in a manner that identifies the regulated entity as the subject of the report, it may check the appropriate box in Section V.

### **6. ESTIMATE OF BURDEN**

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](mailto: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: Regulated Entity Identification Information

**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:**



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## 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.

Does your firm, in a manner reflective of its size and other characteristics:	YES	NO
1.1. Have a diversity and inclusion policy approved and supported by the chief executive or other senior level official?	<input type="checkbox"/>	<input type="checkbox"/>
1.2. Have an executive or senior level official overseeing and directing the firm's diversity and inclusion efforts?	<input type="checkbox"/>	<input type="checkbox"/>
1.3. Have an executive or senior level official with dedicated resources to support diversity strategies and initiatives?	<input type="checkbox"/>	<input type="checkbox"/>
1.4. Make diversity and inclusion a consideration in the firm's strategic plan for:		
a. Recruiting, hiring, developing, and retaining the firm's workforce?	<input type="checkbox"/>	<input type="checkbox"/>
b. Contracting with vendors and suppliers?	<input type="checkbox"/>	<input type="checkbox"/>
1.5. Take proactive steps to promote a diverse pool of candidates, including women and minorities, when:		
a. Recruiting, hiring, retaining, and promoting?	<input type="checkbox"/>	<input type="checkbox"/>
b. Selecting executive and senior level officials?	<input type="checkbox"/>	<input type="checkbox"/>
c. Selecting members of the board of directors or other governing body?	<input type="checkbox"/>	<input type="checkbox"/>
1.6. Offer training and educational opportunities on equal employment opportunity and diversity and inclusion on a regular basis?	<input type="checkbox"/>	<input type="checkbox"/>
1.7. Provide regular progress reports on diversity and inclusion efforts to:		
a. Executive and senior level officials?	<input type="checkbox"/>	<input type="checkbox"/>
b. The board of directors or other governing body?	<input type="checkbox"/>	<input type="checkbox"/>

**Please describe other practices that demonstrate leadership commitment to diversity and inclusion:**

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## **2. Workforce Profile and Employment Practices**

Many regulated entities take proactive measures to promote the fair inclusion of minorities and women in their workforces. Regulated entities with successful diversity and inclusion programs also regularly evaluate their programs and identify areas to be improved.

<b>Does your firm, in a manner reflective of its size and other characteristics:</b>	<b>YES</b>	<b>NO</b>
<b>2.1. Implement policies and practices related to workforce diversity and inclusion in a manner that complies with all applicable laws?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.2. Execute policies and practices to create diverse applicant pools for both internal and external employment opportunities, which may include:</b>		
a. Outreach to organizations primarily serving minorities and women?	<input type="checkbox"/>	<input type="checkbox"/>
b. Outreach to educational institutions serving significant minority and women student populations?	<input type="checkbox"/>	<input type="checkbox"/>
c. Participating in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
d. Communicating employment opportunities through media predominately serving minority and women?	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.3. Regularly evaluate performance under its workforce diversity and inclusion programs?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.4. Utilize quantitative measurements to assess its workforce diversity and inclusion efforts in its employment activities (e.g., hires, promotions, separations, career development, and retention)?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.5. Utilize qualitative measurements (e.g., surveys) to assess its workforce diversity and inclusion efforts in employment activities?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.6. Hold management at all levels accountable by including diversity and inclusion objectives in individual performance plans?</b>	<input type="checkbox"/>	<input type="checkbox"/>

**What are the firm's greatest challenges to advancing diversity and inclusion in its workforce?**

**What practices have been successful in advancing workforce diversity and inclusion?**

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

### **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 organizations have achieved success at expanding available business options by increasing outreach to minority-owned and women-owned businesses. 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.

<b>Does your firm, in a manner reflective of its size and other characteristics:</b>	<b>YES</b>	<b>NO</b>
<b>3.1. Have a supplier diversity policy that provides business opportunities to diverse suppliers, including minority-owned and women-owned businesses?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>3.2. Implement practices to promote a diverse supplier pool:</b>	<input type="checkbox"/>	<input type="checkbox"/>
Do these practices include:		
a. Conducting outreach to minority-owned and women-owned contractors and representative organizations or affinity groups?	<input type="checkbox"/>	<input type="checkbox"/>
b. Participating in conferences, workshops, and other events to attract minority-owned and women-owned firms and inform them of contracting opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
c. Maintaining a list of qualified minority-owned and women-owned businesses that may compete for upcoming contracting opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
d. Having an ongoing process to publicize its procurement opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
<b>3.3. Have methods and/or metrics to evaluate its supplier diversity, relating to:</b>		
a. Annual procurement spending?	<input type="checkbox"/>	<input type="checkbox"/>
b. Percentage of contract dollars awarded to contractors that are minority-owned and women-owned businesses by gender, race, and ethnicity?	<input type="checkbox"/>	<input type="checkbox"/>
c. Percentage of contracts with subcontractors that are minority-owned and women-owned businesses?	<input type="checkbox"/>	<input type="checkbox"/>
d. Changes related to the above items over time?	<input type="checkbox"/>	<input type="checkbox"/>



**What are the firm's greatest challenges to advancing supplier diversity objectives?**

**What practices have been successful in advancing supplier diversity objectives?**

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

Does your firm, in a manner reflective of its size and other characteristics:	Yes	No
4.1. Make information about its diversity and inclusion efforts available to the public through its website or other appropriate communication method?	<input type="checkbox"/>	<input type="checkbox"/>
4.2. Make the following information public on its website or in other appropriate communications:		
a. The firm's diversity and inclusion strategic plan?	<input type="checkbox"/>	<input type="checkbox"/>
b. The firm's policy on its commitment to diversity and inclusion?	<input type="checkbox"/>	<input type="checkbox"/>
c. Information regarding the firm's progress toward achieving diversity and inclusion in its workforce?	<input type="checkbox"/>	<input type="checkbox"/>
d. Information regarding the firm's progress toward achieving diversity and inclusion in its procurement activities?	<input type="checkbox"/>	<input type="checkbox"/>
4.3. Publish opportunities that promote diversity and inclusion on the firm's website, which may include:		
a. Employment and internship opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
b. Contracting opportunities?	<input type="checkbox"/>	<input type="checkbox"/>
c. Mentorship and developmental programs for employees?	<input type="checkbox"/>	<input type="checkbox"/>
d. Developmental programs for potential contractors?	<input type="checkbox"/>	<input type="checkbox"/>

**What has your firm found to be the most valuable tools to promote transparency of organizational diversity and inclusion?**

## **5. Entities' Self-Assessment**

Regulated entities 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. Regulated entities are encouraged to disclose their diversity policies and practices, as well as information related to their assessments, to the SEC and the public.

<b>Does your firm, in a manner reflective of its size and other characteristics:</b>	<b>Yes</b>	<b>No</b>
<b>5.1. Monitor and evaluate the firm's performance under its diversity policies and practices on an ongoing basis?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5.2. Use the Joint Standards to conduct a self-assessment of the firm's diversity policies and practices annually?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5.3. Modify the firm's diversity policies and practices based on the results of the self-assessment?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5.4. Provide information pertaining to the firm's diversity assessments to the SEC's OMWI Director, when requested?</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5.5. Make information about its self-assessment public on its website or through other public communication?</b>	<input type="checkbox"/>	<input type="checkbox"/>



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## Section III: Diversity Profile of Regulated Entity

### Demographic Composition of Workforce

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>TOTAL</b>									

### Supplier Diversity by Percentage of Contracting Dollars

Of the firm's total annual procurement spend with all vendors and suppliers for the period covered by this assessment, what is 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 (%)	Black or African American (%)	Native Hawaiian or Other Pacific Islander (%)	Asian (%)	American Indian or Alaska Native (%)		



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### Section IV. Further Comments (you may attach additional pages if necessary)

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## Section V. Consent for Disclosure of Information

The SEC will aggregate information contained in Diversity Assessment Reports for monitoring progress and trends, and to highlight successful diversity policies and practices, primarily in OMWI's Annual Report to Congress. The SEC will *not* publish diversity and inclusion information that identifies any particular regulated entity unless the regulated entity consents in writing to such use. On behalf of your firm, please choose one of the following:

- My firm consents to the disclosure of its Diversity Assessment Report and the information it contains in a manner that identifies the firm as the subject of the report.
- My firm does **NOT** consent to the disclosure of its Diversity Assessment Report and the information it contains in a manner that identifies the firm as the subject of the report.

**Authorizing Official:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_

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