



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.

**The following
is an excerpt
of our DAR.**

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.	<input type="checkbox"/>	
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.	<input type="checkbox"/>	
1.3 The firm includes diversity and inclusion considerations as part of its strategic plan for recruiting, hiring, retaining, and promoting employees.	<input type="checkbox"/>	
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.	<input type="checkbox"/>	
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.	<input type="checkbox"/>	

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.	<input type="checkbox"/>	
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.	<input type="checkbox"/>	
1.7(b) Selecting members of the board of directors or other governing body.	<input type="checkbox"/>	
1.8 The firm regularly offers training and educational opportunities on equal employment opportunity and diversity and inclusion.	<input type="checkbox"/>	
1.9 The firm provides regular progress reports on diversity and inclusion efforts to the board of directors or other governing body.	<input type="checkbox"/>	

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.	<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 employment opportunities. These practices 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"/>	
2.1(d) Communication of employment opportunities through media predominately serving minorities and women.	<input type="checkbox"/>	

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.	<input type="checkbox"/>	
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).	<input type="checkbox"/>	
2.4 The firm uses qualitative measures (e.g., surveys) to assess the effectiveness of its diversity and inclusion efforts in its employment activities.	<input type="checkbox"/>	
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.	<input type="checkbox"/>	

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