Section 342(b)(2)(C) of the Dodd-Frank Wall Street Reform and Consumer Protection Act

OMB No. 7100-0368 Expires February 28, 2019

The Federal Reserve Board provides this self-assessment template to institutions regulated by the Federal Reserve Board in support of the Interagency Policy Statement Establishing Joint Standards for Assessing Diversity Policies and Practices of Regulated Entities dated June 10, 2015. Pursuant to the Statement of Policy, a self-assessment by an institution is voluntary. An institution that conducts a self-assessment of its diversity policies and practices using the standards contained in the Statement of Policy may utilize this template or its own assessment tool.

its diversity policies and practices using the standards contained in tool.	n the Statement of Policy ma	y utilize this template o	rits own assessment		
Institution Name:	Period Covered by the Assessment:				
	Date Submitted:				
Address:	City:	State:	Zip Code:		
Diversity and Inclusion Officer or Equivalent:	Supplier Diversity Officer	or Equivalent:			
Name:	Name:				
Title:	Title:				
Email Address:	Email Address:				
Phone Number:	Phone Number:				
Diversity and Inclusion Website:					
Brief Description of the institution Covered by this Assessment (e.g and community characteristics):	g., governance structure, wor	kforce size, total assets,	geographic location,		
and community characteristics).					

PAPERWORK REDUCTION ACT NOTICE

Public reporting burden for this questionnaire is estimated to average eight hours per response. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, N.W., Washington, DC 20551; and to the Office of Management and Budget, Paperwork Reduction Project (7100-0181), Washington, DC 20503.

FRB OMWI (August/2016)

This questionnaire is authorized by law (12 U.S.C. § 342(b)(2)(C)) and is voluntary.

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#### PART I. ASSESSMENT OF THE BANK'S DIVERSITY POLICIES AND PRACTICES

#### (1) Institution's Commitment to Diversity and Inclusion

The leadership of an institution 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 institution on a day-to-day basis. These Standards inform how an institution promotes diversity and inclusion in both employment and contracting and how it fosters a corporate culture that embraces diversity and inclusion.

STANDARDS	YES	NO	Program Successes and/or Program Challenges
In a manner reflective of the individual institution's size and other characteristics,			
1.1 The institution includes diversity and inclusion considerations in both employment and contracting as an important part of its strategic plan for recruiting, hiring, retention, and promotion.			
1.2 The institution has a diversity and inclusion policy that is approved and supported by senior leadership, including senior management and the board of directors.			
1.3 The institution provides regular progress reports to the board and senior management.			
1.4 The institution regularly conducts training and provides educational opportunities on equal employment opportunity and on diversity and inclusion.			
1.5 The institution has a senior level official, preferably with knowledge of and experience in diversity and inclusion policies and practices, who oversees and directs the bank's diversity and inclusion efforts.			

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1.6 The institution takes proactive steps to promote a diverse pool of candidates, including women and minorities, in its hiring, recruiting, retention, and promotion, as well as in its selection of board members, senior management, and other senior leadership positions.			
(2) Workforce Profile and Employment Practices			
Many institutions promote the fair inclusion of minorities and women in their workforce by priminority and women professional organizations and educational institutions, creating a culturencouraging a focus on these objectives when evaluating the performance of managers. Instrugularly evaluate their programs and identify areas to be improved.	ire that	values t	he contribution of all employees, and
STANDARDS	YES	NO	Program Successes and/or Program Challenges
In a manner reflective of the individual institution's size and other characteristics,			
2.1 The institution implements policies and practices related to workforce diversity and inclusion in a manner that complies with all applicable laws.			
2.2 The institution ensures equal employment opportunities for all employees and applicants for employment and does not engage in unlawful employment discrimination based on gender, race, or ethnicity.			
2.3 The institution has policies and practices that create diverse applicant pools for both internal and external opportunities that may include:			
2.3.a. Outreach to minority and women organizations;			
<ol><li>2.3.b. Outreach to educational institutions serving significant minority and women student populations;</li></ol>			
2.3.c. Participation in conferences, workshops, and other events to attract minorities and women and to inform them of employment and promotion opportunities.			

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OMB No. 7100-0368 Expires February 28, 2019 2.4 The institution utilizes both quantitative and qualitative measurements to assess its workforce diversity and inclusion efforts. These efforts may be reflected, for example, in applicant tracking, hiring, promotions, separations (voluntary and involuntary), career development, and retention across all levels and occupations of the institution, including the executive and managerial ranks. 2.5 The institution holds management at all levels accountable for diversity and inclusion efforts, for example, by ensuring that such efforts align with business strategies and individual performance plans. (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 banks have achieved success at expanding available business options by increasing outreach to minorityowned and women-owned businesses. As in the employment context, institutions often use metrics to identify the baseline of how much they spend procuring and contracting for goods and services, how much they spend with minority-owned and women-owned businesses, and the availability of relevant minority-owned and women-owned businesses, as well as changes over time. Similarly, institutions may use outreach to inform minority-owned and women-owned businesses (and affinity groups representing these constituencies) of these opportunities and of the procurement process. In addition, institutions' prime contractors often use subcontractors to fulfill the obligations of various contracts. The use of minority-owned and women-owned businesses as subcontractors provides valuable opportunities for both the minority-owned and womenowned businesses and the prime contractor. Institutions may encourage the use of minority-owned and women-owned subcontractors by incorporating this objective in their business contracts. **Program Successes and/or Program** YES NO **STANDARDS Challenges** In a manner reflective of the individual institution's size and other characteristics, 3.1 The bank has a supplier diversity policy that provides for a fair opportunity for minority-owned and women-owned businesses to compete for procurement of business goods and services. This includes contracts of all types, including contracts for the issuance or guarantee of any debt, equity, or security, the sale of assets, the management of the institution's assets, and the development of the bank's equity investments. 3.2 The institution has methods to evaluate its supplier diversity, which may include metrics and analytics related to: 3.2.a. Annual procurement spending; 3.2.b. Percentage of contract dollars awarded to minority-owned and

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women-owned businesses by race, ethnicity, and gender;

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Expires February 28, 2019 3.2.c. Percentage of contracts with minority-owned and women-owned business subcontractors; 3.3. The bank has practices to promote a diverse supplier pool, which may include: 3.3.a. Outreach to minority-owned and women-owned contractors and representative organizations; 3.3.b. Participation in conferences, workshops, and other events to attract minority-owned and women-owned firms and inform them of contracting opportunities; 3.3.c. An ongoing process to publicize its procurement opportunities. (4) Practice to Promote Transparency of Bank's Diversity and Inclusion Transparency and publicity are important aspects of assessing diversity policies and practices. Greater awareness and transparency give the public information to assess those policies and practices. Institutions publicize information about their diversity and inclusion efforts through normal business methods, which include displaying information on their websites, in their promotional materials, and in their annual reports to shareholders, if applicable. By making public an Institution'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, an Institution informs a broad constituency of investors, employees, potential employees, suppliers, customers, and the general community about its efforts. The publication of this information can make new markets accessible for minorities and women and illustrate the progress made toward an important business goal. **Program Successes and/or Program** YES **STANDARDS** NO **Challenges** In a manner reflective of the individual institution's size and other characteristics, the institution is transparent with respect to its diversity and inclusion activities by making information available to the public annually through its website or other appropriate communication methods. 4.1 The institution publicizes its diversity and inclusion strategic plan. 4.2 The institution publicizes its policy on its commitment to diversity and inclusion. 4.3. The institution is transparent about its progress toward achieving diversity and inclusion in its workforce and procurement activities, which may include the bank's current workforce and supplier demographic profiles.

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OMB No. 7100-0368 Expires February 28, 2019 4.4. The bank publicizes its opportunities to promote diversity, which may include: 4.4.a. Current employment and procurement opportunities; 4.4.b. Forecasts of potential employment and procurement opportunities; 4.4.c. The availability and use of mentorship and developmental programs for employees and contractors. (5) Institutions' Self-Assessment Institutions 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. Institutions are encouraged to disclose their diversity policies and practices, as well as information related to their assessments, to the Federal Reserve Board and the public. **STANDARDS** NO YES **Program Successes or Program Challenges** In a manner reflective of the individual institution's size and other characteristics, 5.1 The institution conducts an assessment of its diversity policies and practices annually. 5.2. The institution monitors and evaluates its performance under its diversity policies and practices on an ongoing basis. 5.3. The institution publishes information pertaining to its assessment of its diversity policies and practices.

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#### PART II. DIVERSITY DATA

Workforce Profile							
1.1. What percentage of the institution's total workforce covered by this assessment is comprised of women and minorities?	Women	% Minoriti	Minorities%				
1.2. What are the numbers and percentages of women and minorities in the institution's Executive/Senior Level Officials and Managers job category as shown in its most recent annual EEO-1 Report?	Total Women##		Minorities # %				
1.3. What are the total numbers and percentages of women and minorities on the institution's Board of Directors?	Total Board Members#	Women # %	Minorities # %				
Procurement – Supplier Diversity							
2.0. What is the institution's most recent annual total spending with women and minority-owned businesses compared to the total spending with all vendors and suppliers?	Total Spending \$	Women- owned Spending \$%	Minority- owned Spending \$%				

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## PART III. OTHER INFORMATION OR COMMENTS

Other information or comments the institution deems important regarding the self-assessment of its diversity and inclusion policies and practices:

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#### **Use of Information by the Federal Reserve Board**

The Federal Reserve Board may use information submitted by the institution to monitor progress and trends in the financial services industry with regard to diversity and inclusion in employment and contracting activities and to identify and highlight those policies and practices that have been successful. The Federal Reserve Board will continue to reach out to financial institutions and other interested parties to discuss diversity and inclusion in the financial services industry and share leading practices. The Federal Reserve Board may also publish information disclosed by the institution, such as any identified leading practices, in any form that does not identify a particular institution or individual or disclose confidential business information.

