



# 5 Workforce and Board Diversity

PolicyLink

FSG REIMAGINING SOCIAL CHANGE

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Learn more about the Alliance and the draft standards in our latest report, *Introducing the Business Standards for 21st Century Leadership: Public Consultation Report and Draft Standards* available at <https://corporateracialequityalliance.org/corporate-standards>.



# Reviewing and Submitting Feedback

## How to Navigate This Standard

Each draft standard begins with an overview, including:

- The outcome that the standard supports achieving
- The basic requirement of the standard
- A list of the currently proposed performance targets for the standard
- The value proposition of adopting the standard
- The most closely associated equity outcomes, showing how achievement of the standard contributes to positive societal impact
- A non-exhaustive list of related sustainability standards and frameworks

Following the overview is a glossary of key terms. Then, each performance target is presented with specific requirements, metrics, implementation guidelines, and resources. To support companies in getting started, suggested interim targets and metrics are included as well.

Navigation links are provided at the bottom of each page, beginning on page 5.

## Submitting Feedback

This is a living document and your participation in strengthening this work is important to us. Alongside our ongoing research and testing with companies, we look forward to feedback on these questions:

- Is the standard clear and compelling?
- Do you agree that the performance targets for this standard cover critical ways for companies to address discrimination and exclusion, and advance socially responsible business practices within the given topic? If not, why not?
- Are there additional or alternative performance targets you recommend for this standard?
- What additional guidance, if any, would be helpful for a company to get started and/or make steady progress toward achieving this standard?

Submit your feedback by completing [this survey](#) (letter submissions will also be accepted) or attending one of our virtual roundtables. [Find more information here on providing your feedback.](#)

# 5 The company has a diverse workforce and Board across race, ethnicity, gender, and other demographics.





## Requirement

■ Ensure equal opportunities for all by eliminating bias and discrimination in recruitment, hiring, development, and retention practices at all levels as well as in Board director recruitment, appointment, and evaluation practices.

### Performance Targets

- P5.1** Recruitment policies and practices cast the net wide for talent.
- P5.2** Hiring practices proactively combat bias and discrimination.
- P5.3** Talent management systems promote career development and well-being for all.
- P5.4** Retention and turnover rates are regularly analyzed across demographic groups and concrete action is taken to address any disparities.
- P5.5** Promotion and internal hire rates are regularly analyzed across demographic groups and concrete action is taken to ensure equal opportunities for advancement.
- P5.6** Senior leadership development, succession planning, and recruitment practices ensure equal opportunities for all.
- P5.7** Board director recruitment, appointments, and evaluation practices ensure equal opportunities and strive for a fit-for-purpose Board.

### Associated Equity Outcomes

-  Balanced Power
-  Wealth Generation and Economic and Social Mobility
-  Health and Well-Being
-  Inclusive Representation and Narrative Change

### Key Connections

- SDGs 5, 8, and 10
- ESRS S1
- IFRS S1
- UNGP 20

## Business and Societal Value Proposition

One of the company’s most valuable resources is its workforce.

[A staggering 90% of all business value](#) is attributed to the intangible assets largely generated by human capital, meaning the collective skills, experience, and health of the workforce. Research also shows that companies with more diverse workforces, including across race, ethnicity, and gender, are [better at avoiding groupthink](#), [more resilient](#), and [more innovative and profitable](#). Diverse leadership teams are also associated with [superior decision-making](#) and [greater levels of engagement](#). With the U.S. set to become a [majority people-of-color nation by 2045](#), building a diverse workforce is also an imperative for business relevance and competitiveness.

However, [numerous studies](#) reveal systemic bias and discrimination impeding equal employment opportunities for people of color, women, and other historically underrepresented groups. Similarly, [in boardrooms across the U.S.](#), people of color, women, and other historically marginalized groups are dramatically underrepresented. [While some progress has been made, much more is needed.](#)

Failing to effectively combat bias and discrimination in talent recruitment and management not only risks business relevance and competitiveness, but also risks greater exposure to discrimination claims and more difficulty in attracting and retaining top talent from all backgrounds.

The performance targets for this Standard therefore focus on eliminating bias and discrimination from policies and practices related to talent recruitment and management across the employment lifecycle and at all levels, as well as related to Boards. Achieving this Standard is about leveling the playing field to ensure equal opportunities for all people, regardless of their background.

# Glossary

## Contingent workers

Individuals who are contracted to provide labor for the company, whether part-time, full-time, or on a temporary basis, such as gig workers, self-employed individuals, or workers from staffing agencies and other vendors.

## Demographics or demographic groups

Characteristics of a specific human population, such as geographic location, socioeconomic status, race, ethnicity, gender, sexual orientation, disability, and age.

## Direct workers

Individuals who are in an employment relationship with the company, such as full-time and part-time employees.

## Disaggregate

To collect and separate compiled data into smaller units or subcategories so that component parts can be isolated and examined for trends and patterns (e.g., data organized by specific racial and ethnic groups versus “people of color” as a single grouping).

## Disparity

A statistically significant difference in access, opportunity, use, or outcomes for one or more **demographic groups** that has no valid justification (i.e., cannot be explained by legitimate, nondiscriminatory business reasons). Disparities are indicative of unequal treatment and/or opportunities. In the context of the Standards, disparities can be addressed by adopting new systems, policies, and practices that promote fairness for all people regardless of their background.

## Diversity

Of a group, possessing variation on the basis of social demographics, such as across race, ethnicity, gender, sexual orientation, disability, and age (e.g., a diverse workforce).

## Equity

Just and fair **inclusion** into a society in which all can participate, prosper, and reach their full potential. When everyone is treated fairly according to their needs and no group of people is given special treatment.

## Fair chance hiring

Policies and practices that aim to ensure fair access to work for the approximately 70 million Americans with a criminal record, based on the premise that all people have the right to be fairly assessed for roles they are qualified for, regardless of their background. [Learn more here.](#)

## Form EEO-1

A mandatory annual data collection by the U.S. Equal Employment Opportunity Commission (EEOC) that requires all private sector employers with 100 or more employees, and federal contractors with 50 or more employees meeting certain criteria, to submit demographic workforce data, including data by race/ethnicity, sex, and job categories to the EEOC. [Learn more here.](#)

## Gap analysis

A comparative analysis of the current state of a set of quantitative or qualitative factors against a given Performance Target, including the Guidelines. Conducting such an analysis is step one across every Performance Target.

## Inclusion

The values, practices, and policies that ensure all people, across all social demographics, feel respected, safe, and valued, including and accommodating people who have historically been excluded such as due to their race, ethnicity, gender, sexual orientation, or disability. Inclusion values and leverages **diversity**, recognizing it as a source of strength for organizations.

## Internal hire

Filling a vacant job with talent from within the organization, including via **lateral moves or transfers**.

## Internal hire rate

The percentage of **internal hires** during a defined period, calculated as the total number of internal hires, divided by the average **direct worker** headcount during the period, multiplied by 100.

## Intersectionality

The interconnected nature of inequality across social categorizations, such as race, ethnicity, gender, sexual orientation, disability, and class, which in turn results in overlapping and interdependent systems of discrimination or disadvantage for a given individual or group of people. As described by professor [Kimberlé W. Crenshaw](#) of Columbia Law School, who coined the term over 30 years ago, intersectionality is “[a lens... for seeing the way in which various forms of inequality often operate together and exacerbate each other.](#)”

Job function or type

The core set of activities or tasks an individual completes as part of the responsibilities of their position at the company, including daily duties, projects, and defined areas of oversight or management.

Lateral move or transfer

A career or role change where a **direct worker** moves from one position to another within the company with little or no change in pay, level, or authority.

Leaders or leadership

Senior leaders, as defined below, plus:

- Middle management, including people managers who have oversight of, but are not directly managing, non-managerial workers; and
- Any other internal leaders with decision-making power over non-managerial workers.

Promotion

Advancement by a **direct worker** to a position that is classified at a higher pay grade.

Promotion rate

The percentage of **promotions** during a defined period, calculated as the total number of promotions, divided by the average **direct worker** headcount during the period, multiplied by 100.

Retention

A business’s ability to keep **direct workers** and reduce voluntary separations (specifically, resignations) through effective talent policies and practices and a safe and inclusive workplace culture.

Retention rate

The percentage of **direct workers** who stay at the company for a defined period, excluding new hires, calculated as:

- The total number of direct workers at the beginning of the period minus the total number of voluntary separations by the end of the period, which is
- Divided by the total number of direct workers, and
- Multiplied by 100.

Senior leaders or senior leadership

- Officers as defined in the company’s bylaws;
- Named executive officers as defined under U.S. Securities and Exchange Commission reporting rules;
- C-Suite or equivalent senior leaders; and
- Leaders with overall ownership and responsibility for department or divisional budgets.

Stakeholders

Individuals and groups who have an interest in the policies and practices of companies not only because they are affected by them, but also because they have rights to be respected and protected by companies, e.g., workers’ rights to fair wages, consumers’ rights to safe products, suppliers’ rights to transparency, investors’ rights to be informed of material facts, communities’ rights to clean and safe neighborhoods, and society’s rights to a healthy environment, among others.

Turnover

Voluntary and involuntary separation of **direct workers**.

Turnover rate

The percentage of voluntary and involuntary separations of **direct workers** during a defined period, including new hires, calculated as the total number of voluntary and involuntary

separations, divided by the average direct worker headcount during the period, multiplied by 100.

Underrepresented groups

A **demographic group** whose representation in a given setting or context is disproportionately low relative to their numbers in the general population. Historically underrepresented demographic groups in the private sector include people of color, women, LGBTQ+ people, and people with disabilities. The company should strive to maintain a current understanding of the demographic groups who may be underrepresented in the organization (whether in particular **job types** or at particular career levels) and/or in its industry, and take concrete action to promote equal opportunities for all.



PERFORMANCE TARGET 5.1

Recruitment policies and practices cast the net wide for talent from all backgrounds.

Requirement

Establish a [diverse](#) pipeline of well-qualified talent through multiple concrete steps, annually striving for an applicant pool that includes applications from a broad array of [underrepresented groups](#).

Metrics

**Policy metric:** one or more written policies integrating the practices in the guidelines.

**Practice metric:** [demographic](#) composition of annual applicant pool, [disaggregated](#) by [job type](#) and level, and at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure to the workforce of efforts to build diverse talent pipelines and concrete actions they can support.

At least annual disclosure to the Board of overall progress toward building diverse talent pipelines,

including (i) current and last three years’ composition of applicant pools, disaggregated by job type and demographic groups; (ii) any [disparities](#) across groups; and (iii) concrete actions being taken to expand the talent pipeline.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

RATIONALE:

Being an equal opportunity employer in a society with unparalleled demographic diversity means ensuring recruitment policies and practices proactively combat bias and discrimination. Step one is casting the net wide for well-qualified talent from all backgrounds.

[Not only are the benefits of a diverse workforce clear](#), but failing to cast the recruitment net wide may leave the company at a competitive disadvantage for attracting and retaining the best talent from all backgrounds. More than ever before, today’s talent desire to work for companies with diverse workforces and expect employers to live up to their stated values. In addition, companies lacking in demographic diversity, at any level and across functions, risk increased groupthink and greater exposure to discrimination claims, to name a few. Accordingly, this Target aims to support companies in ensuring recruitment efforts are free from bias and discrimination in order to successfully attract talent from all backgrounds.

IMPLEMENTATION TIPS:

- 1. This Target does not call for and should not be read as recommending or requiring businesses to make hiring or other employment decisions based on any protected status or characteristic in violation of any law.
- 2. Adopting Standard 6 (job quality) will support success here by helping to ensure the company is offering attractive, high-quality jobs, including inclusive healthcare benefits.

GUIDELINES:

- 1. “Applications from a broad array of underrepresented groups” is context-specific, but means at least across race, ethnicity, gender, sexual orientation, disability, and age. (Note: Upon the launch of the final Standards, a data supplement profiling the barriers to equal employment opportunities faced by historically underrepresented groups will be included here).
- 2. Establish a diverse pipeline of well-qualified talent from all backgrounds by taking the following concrete steps and formalizing the company’s practices in a written policy:
  - a. Debias job descriptions, including using gender-neutral position titles and pronouns, avoiding or balancing gendered terms, using [ADA-compliant language](#), ensuring qualifications are job-related, and clearly delineating between absolute job requirements versus “nice to have” requirements.
  - b. Specify the availability of reasonable accommodations for people with disabilities. [See here for tools and resources](#), including on workplace accommodations more broadly.
  - c. Implement [skills-based hiring](#), including removing immaterial and outdated skills from

- job descriptions and unneeded academic and professional degree requirements for all roles (not just entry-level roles). [Learn how to get started here](#) and [here](#), plus [see here for the roles best positioned for skills-based hiring](#).
- d. Explicitly state in job descriptions the company's aspiration for a diverse workforce of people from all backgrounds and its commitment to equity and inclusion, all as part of being an equal opportunity employer.
  - e. Provide applicants the option to share their demographic backgrounds. However, ensure that such information is handled in accordance with applicable privacy laws and is not accessible to individuals making employment decisions. (See Target 5.2 on application handling.)
  - f. Post roles on multiple job boards, including local boards and those of organizations that support underrepresented groups in job placement and career development, including those supporting people of color, women, LGBTQ+ individuals, [Opportunity Youth](#), individuals with disabilities, and individuals with non-traditional backgrounds.
  - g. Proactively source candidates from underrepresented groups through partnerships with organizations that support such groups in job placement and career development, including community-based organizations, regional schools, [Minority Serving Institutions](#) (such as [Historically Black Colleges and Universities](#) and [Tribal Colleges and Universities](#)), [Opportunity Youth](#) organizations, LGBTQ+ inclusion organizations, disability inclusion organizations, and workforce development programs for individuals with

- non-traditional backgrounds.
- h. Provide internal recruiters training in support of increasing the percentage of applications from well-qualified underrepresented groups annually.
  - i. Require external recruiters to source well-qualified candidates from underrepresented groups in support of achieving the same.
  - j. Become a [fair chance](#) employer. [Learn more here](#) and see the Resources list for more support.
- 3. The policy may be integrated with the policies referenced in Targets 5.2, 5.3, 5.6, and 5.7 and should be formally approved by the most senior leader(s) with oversight of talent management, as reflected by their signature(s) on the policy.
  - 4. Measure and track results no less than annually, though measuring more frequently (such as quarterly) is recommended if hiring frequently and to more promptly identify and address any disparities.
    - a. Measure progress at the aggregate level as well as by job type and level to identify any gaps in particular areas.
    - b. Because providing demographic information is optional for job applicants, steps should be taken to track results in other ways, such as periodically soliciting feedback from partner organizations supporting recruitment of underrepresented groups.
  - 5. Take concrete action if at any time the applicant pool reveals disparities across any demographic groups (including by job type or level) and/or if labor market data evidences significant underrepresentation of any demographic groups for any job types. The company

- should determine the most appropriate course of action based on its circumstances, which may include the following actions:
- a. A review or audit of recruiting and hiring systems for bias or other structural barriers to equal employment opportunities, especially any AI-enabled or other automated application, resume, or screening tools or processes. (See Target 2.6 on civil rights audits.)
  - b. Increasing outreach and partnerships with organizations that support underrepresented groups in job placement and career development.
  - c. Offering [apprenticeships](#) in partnership with trade groups, community-based organizations, academic institutions, industry and employer associations, labor unions, and other groups.
  - d. Researching job seekers' perceptions of the company's brand, especially across underrepresented groups, and taking concrete action based on the findings.
  - e. Incentivizing employees to refer well-qualified candidates from underrepresented groups. (See Target 5.2 on establishing a referral policy.)
  - f. Collaborating with employee resource groups to identify well-qualified candidates from underrepresented groups.
  - g. Contributing meaningful resources to academic institutions that serve underrepresented groups.
  - h. Joining industry efforts to build and support the pipeline of talent from underrepresented groups.



- i. Offering mentorship, coaching, and training programs in partnership with organizations that support underrepresented groups.
- j. Supporting or advocating for public policies that promote the growth and success of talent from underrepresented groups.

Example Interim Targets

Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.

- [Gap analysis](#) conducted of recruitment practices and demographic composition of applicant pool.
- Demographic data gathering and disaggregation is implemented in the company's applicant tracking system (ATS) in line with Target 2.4 (disaggregating people-related data).
- Increased percentage of job applications in a given year are from underrepresented groups, including across race, ethnicity, gender, sexual orientation, disability, and age.

Example Interim Metrics

Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.

- Record of gap analysis results shared with [senior leadership](#).
- ATS reflects data disaggregated across demographic groups.
- Demographic composition of annual applicant pool, disaggregated by job type and level, and at least race, ethnicity, gender, sexual orientation, disability, and age.

Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks addressing similar issues.

Resources

[Capturing the Diversity Benefit: Workplace Diversity Linked to Financial Performance](#) (Meredith Benton and Kaitlyn Ng, As You Sow, November 2023)

[If There's Only One Woman in Your Candidate Pool, There's Statistically No Chance She'll Be Hired](#) (Stefanie K. Johnson, David R. Hekman, and Elsa T. Chan, Harvard Business Review, April 2016)

[The Disability Inclusion Imperative](#) (Laurie A. Henneborn, et al., Accenture, Disability:IN, and American Association of People with Disabilities, 2023)

[The Nation is Diversifying Even Faster Than Predicted, According to New Census Data](#) (William H. Frey, Brookings Institution, July 2020)

[The Great Attrition is Making Hiring Harder. Are You Searching the Right Talent Pools?](#) (Aaron De Smet, et al., McKinsey Quarterly, July 2022)

[Occupational Segregation in America](#) (Marina Zhavoronkova, Rose Khattar, and Mathew Brady, Center for American Progress, March 2022)

[Evidence That Gendered Wording in Job Advertisements Exists and Sustains Gender Inequality](#) (Danielle Gaucher, Justin Friesen, and Aaron C. Kay, Journal of Personality and Social Psychology, March 2011)

[Why Women Don't Apply for Jobs Unless They're 100% Qualified](#) (Tara Sophia Mohr, Harvard Business Review, August 2014)

[A Guide to Improving Recruitment, Retention, Advancement](#)

[and Equity](#) (BR's Multiple Pathways Initiative, Business Roundtable, Lightcast, and Burning Glass Institute, 2022)

[The Emerging Degree Reset](#) (Joseph B. Fuller, et al., The Burning Glass Institute, February 2022)

[Dismissed by Degrees: How Degree inflation is Undermining U.S. Competitiveness and Hurting America's Middle Class](#) (Joseph B. Fuller and Manjari Raman, Accenture, Grads of Life, and Harvard Business School, October 2017)

[Eliminate a Degree of Difficulty: Hire for Skills, Not School](#) (Joe Lischwe, et al., Bain & Company, OneTen, and Grads of Life, 2023)

[Wanted: 'New Collar' Workers](#) (Lora Kelley, The New York Times, December 2023)

[Untapped Potential: How New Apprenticeship Approaches Will Increase Access to Economic Opportunity](#) (Matt Sigelman and Euan Blair, The Burning Glass Institute and Multiverse, November 2023)

[Advancing Apprenticeship: Opportunities for States and Business to Create and Expand Registered Apprenticeship Programs](#) (Jordan Morang and Elizabeth Oberg, National Governors Association and Business Roundtable, November 2023)

[Job Accommodation Network \(JAN\)](#) (Office of Disability Employment Policy, U.S. Department of Labor, accessed May 2024)

[What are Fair Chance Hiring Practices?](#) (Checkr Editor, Checkr, February 2022)

[How to Be a Fair Chance Employer](#) (Genevieve Martin, et al., Checkr, 2023)

[Why Businesses Committed to Diversity Should Embrace Fair Chance Hiring](#) (Ken Oliver, World Economic Forum, November 2023)

PERFORMANCE TARGET 5.2

Hiring policies and practices proactively combat bias and discrimination.

Requirement

Proactively combat bias and discrimination in hiring through multiple concrete steps in (i) resume and application screening, (ii) interviewing, (iii) pre-employment tests, (iv) candidate deliberations, and (v) the offer process.

Metrics

**Policy metric:** one or more written policies integrating the practices in the guidelines.

**Practice metric:** [demographic](#) composition of job candidates annually, [disaggregated](#) by [job type](#) and level, stage of hiring, and at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual public disclosure of [Form EEO-1](#) (or equivalent).

Annual disclosure to the workforce of efforts to build diverse talent pipelines and concrete actions they can support.

At least annual disclosure to the Board of overall progress toward building diverse talent pipelines, including (i) current and last three years’ job applicant demographics throughout the hiring process, disaggregated by job type and demographic groups; (ii) any disparities across groups and/or at particular stages of the process; and (iii) concrete actions being taken to combat bias.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

**RATIONALE:**

In addition to establishing a diverse pipeline of well-qualified talent from all backgrounds (Target 5.1), it is important to proactively combat bias and discrimination at all other stages of the hiring process—specifically, resume and application screening, interviewing, pre-employment tests, candidate deliberations, and the offer process.

Doing so is especially important to ensuring equal opportunities for historically [underrepresented groups](#). For example, a recent study confirms that [occupational segregation drives persistent inequality](#). The [overrepresentation of workers of color in frontline roles](#) is just one of the ways this occurs. While frontline roles are a vital part of nearly all sectors of our economy—and where the vast majority of workers are introduced to the

workforce—such roles are most often revolving doors, rather than paths to career advancement. Workers of color therefore face significant impediments to moving up the career ladder, with representation across business functions as much of an issue as representation at the highest levels of leadership. For example, on the current trajectory, it will take [about 95 years](#) for Black employees to reach representation at all career levels in line with their representation across society (12%).

Achieving positive results here means greater candidate [diversity](#) for all types of roles and at all levels, across race, ethnicity, gender, sexual orientation, disability, age, and other demographics. In turn, companies that build and maintain diverse talent pipelines have greater potential to deliver value to all their [stakeholders](#), including workers, customers, and shareholders.

IMPLEMENTATION TIPS:

- 1. This Target does not call for and should not be read as recommending or requiring businesses to make hiring or other employment decisions based on any protected status or characteristic in violation of any law.
- 2. Adopting Standard 6 (job quality) will support success here by helping to ensure the company is offering attractive, high-quality jobs that candidates from all backgrounds want to apply for.

GUIDELINES:

- 1. Proactively combat bias and discrimination from all stages of the hiring process by taking the concrete steps outlined below for each stage and formalizing the company’s practices in a written policy.
- 2. The policy may be integrated with the policies referenced in Targets 5.1, 5.3, 5.6, and 5.7 and should be formally approved by the most senior leader(s) with oversight of talent management, as reflected by their

signature(s) on the policy.

3. **In resume and application screening**, take at least the following concrete steps:

- a. Ensure demographic data associated with any applicant is not included in the package of materials received by interviewers and other decision makers.
- b. Avoid AI-enabled resume screening programs unless the company has assessed such tools to confirm that its use does not result in bias or disparate impact based on any protected characteristics.
- c. Formalize processes for employee referrals, including explicitly stating the importance of workforce diversity and sourcing well-qualified talent from all backgrounds.
- d. Assess employee referral practices for any undue favoritism of any demographic groups.

4. **In the interview process**, take at least the following concrete steps:

- a. Establish job-related, [skills-based](#), consistent, and transparent hiring criteria and interview questions for all interviewers to follow ([and avoid interview questions with hidden agendas](#)). This supports assessment of actual competence for a given role and ensures all applicants have the opportunity to answer the same questions and be assessed against the same rubric.
- b. Proactively share all hiring criteria, background information about the company and relevant department, and what to expect in the interview process with all candidates to ensure they are on the same footing. [See one example with all criteria and interview questions easily available](#)

[to prospective candidates](#).

- c. If multiple interviews are conducted, establish a demographically diverse panel of interviewers including across race, ethnicity, and gender.
- d. Provide reasonable accommodations for people with disabilities and make such options known at the outset.

5. **If pre-employment tests are used**, take at least the following concrete steps:

- a. Ensure the tests do not create disparate impact based on race, ethnicity, gender, sexual orientation, disability, or age.
- b. Validate the test in accordance with applicable law, including under the federal [Uniform Guidelines on Employee Selection Procedures](#), to ensure tests are job-related and consistent with a business necessity.
- c. Provide reasonable accommodations for people with disabilities and make such options known at the outset. If the company uses personality tests, allow candidates to opt-out as an accommodation.
- d. Except for candidates receiving reasonable disability accommodations, ensure pre-employment tests are administered and scored consistently and fairly for all candidates.

6. **In candidate deliberations**, take at least the following concrete steps:

- a. Do not consider or make any screening, hiring or other employment decisions based on a candidate's protected status or characteristics.
- b. Establish deliberation processes (e.g., clear and consistent written instructions) that

reinforce the hiring criteria in Guideline 4 above, including [skills-based hiring](#).

7. **In the offer process**, take at least the following concrete steps:

- a. Prohibit those involved in hiring from (i) asking candidates about their salary history and (ii) relying on such information to make pay decisions even if voluntarily provided by candidates. [Learn how salary history questions contribute to inequality and hinder equal pay](#).
- b. Regularly communicate the above prohibition and offer alternative approaches to teams, such as asking candidates about their compensation *expectations*.
- c. If not already provided in job postings, proactively provide all candidates the compensation range for the relevant position. (See Target 5.5 and Standard 6 for other compensation practices.)
- d. Document how offers will be made in a fair and consistent manner that does not allow for pay negotiations outside of the published range or other more favorable terms based on inside knowledge of the company, pre-existing relationships with hiring managers, or other advantages that all candidates may not have.
- e. See also Target 6.5 on workforce practices to avoid including certain terms in offer letters and employment agreements.

8. Annually train those involved in recruiting and hiring on the company's anti-bias and disability accommodation policies and practices, including the practices above. Such team members' expertise in identifying and combating bias and discrimination in the hiring process is vital for success here.



9. Measure and track results at each stage no less than annually, though measuring more frequently (such as quarterly) is recommended if the company is hiring frequently and to more promptly identify and address any disparities.
  - a. Measure progress at the aggregate level as well as by job type and level to identify any gaps in particular areas.
  - b. Examine any demographic disparities in (i) resume and application screening; (ii) each stage of interviews; (iii) offer rates; and (iv) hire rates.
  - c. Because providing demographic information is optional for job applicants, steps should be taken to track results in other ways, such as periodically soliciting feedback from partner organizations supporting recruitment of underrepresented groups.
10. Take concrete action if there are disparities across any demographic groups at any stage, or job type or level, and/or if labor market data evidences significant underrepresentation of any demographic groups for any job types. The company should determine the most appropriate course of action based on its circumstances, which may include the following:
  - a. Sourcing multiple additional well-qualified candidates from underrepresented groups if demographic diversity is lacking at a given stage of the interview process.
  - b. Soliciting feedback from candidates who decline offers about the factors that contributed to their decision, and taking concrete action based on the findings.
  - c. Taking any of the concrete actions listed in Target 5.1 Guideline 5.

## Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of hiring practices and demographic composition of job candidates.
- Demographic data gathering and disaggregation is implemented in the company's applicant tracking system (ATS) in line with Target 2.4 (disaggregating people-related data).
- At least two concrete steps are codified and practiced within each stage of the hiring process consistent with the guidelines.

## Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with [senior leadership](#).
- ATS reflects data disaggregated across demographic groups.
- Documentation of concrete steps codified and practiced within each stage of the hiring process.

## Relevance to Other Frameworks

*Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.*

## Resources

[Capturing the Diversity Benefit: Workplace Diversity Linked to Financial Performance](#) (Meredith Benton and Kaitlyn Ng, As You Sow, November 2023)

[When it Comes to Business Decisions Diversity is Not Propaganda](#) (Erik Larson, Forbes, October 2018)

[Skills-Based Hiring: The Long Road from Pronouncements to Practice](#) (Matt Sigelman, Joseph Fuller, and Alex Martin, The Burning Glass Institute and Harvard Business School, February 2024)

[The National Study of Workplace Equity](#) (Samuel Bradley, Jr. and Marcie Pitt-Catsouphes, Boston College School of Social Work and SHRM, December 2022)

[Incorporating DEI into Decision-Making](#) (Edward Chang, et al., Harvard Business Review, September 2023)

[Neurodiversity Inclusion Starts with the Job Interview](#) (Sarah Wittman, Niloofer Kalantari, and Vivian Motti, Fast Company, April 2024)

[What are Fair Chance Hiring Practices?](#) (Checkr Editor, Checkr, February 2022)

[How to Be a Fair Chance Employer](#) (Genevieve Martin, et al., Checkr, 2023)

[Measuring the Impact of Skills-Based Talent Practices](#) (BR Multiple Pathways Initiative, Business Roundtable and Grads of Life, September 2022)

[Approaching Diversity with the Brain in Mind](#) (Khali Smith and David Rock, PwC Strategy + Business, June 2018)

[7 Metrics to Measure Your Organization's DEI Progress](#) (Lee Jourdan, Harvard Business Review, May 2023)

[How to Advance Corporate Diversity in Compliance with the Law: A Toolkit](#) (Ronald C. Machen, et al., WilmerHale, 2021)

[If There's Only One Woman in Your Candidate Pool, There's Statistically No Chance She'll Be Hired](#) (Stefanie K. Johnson, David R. Hekman, and Elsa T. Chan, Harvard Business Review, April 2016)

[Occupational Segregation Drives Persistent Inequality, Study Says](#) (Steve Lohr, The New York Times, September 2023)

[The Limits of Educational Attainment in Mitigating Occupational Segregation Between Black and White Workers](#) (Ashley Jardina, et al., National Bureau of Economic Research, August 2023)

[Occupational Segregation in America](#) (Marina Zhavoronkova, Rose Khattar, and Mathew Brady, Center for American Progress, March 2022)

[Review of Research Literature that Provides Evidence of the Impact of Diversity and Inclusion in the Workplace](#) (Vicky Whiting, Financial Conduct Authority of the United Kingdom, July 2021)

[Business Roundtable Releases Resources for Employers to Reform Hiring and Advancement Practices to Emphasize Skills](#) (Business Roundtable, Business Roundtable [press release], September 2022)

[Why Salary History Bans Matter to Securing Equal Pay](#) (Robin Bleiweis, Center for American Progress, March 2021)

[Asking for Salary History Perpetuates Pay Discrimination from Job to Job](#) (National Women's Law Center, National Women's Law Center [fact sheet], March 2022)

[“What Did You Make at Your Last Job?”: Why the Salary Question is Bad for Women and People of Color](#) (Alexia Fernández Campbell, Vox, May 2018)

PERFORMANCE TARGET 5.3

Talent management systems and practices promote career development and well-being for all.

Requirement

Promote inclusion and proactively combat bias and discrimination in talent management systems and practices through multiple concrete steps related to (i) job structures, (ii) orientation and onboarding, (iii) mentoring and sponsorship, (iv) training and career development, (v) other resources and support, (vi) performance assessment and feedback, (vii) advancement, and (viii) separations.

Metrics

**Policy metric:** one or more written policies integrating the practices in the guidelines.

**Practice metric:** [demographic](#) composition of [direct workers](#) annually accessing resources related to items (iii), (iv), and (v) in the Requirement above, disaggregated by job type and level, and at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure to the workforce of improvements in talent management approaches, lessons learned, and ongoing plans.

At least annual disclosure to the Board of current and last three years’ rates of participation in (i) mentorship and sponsorship, training and career development, and other resources and support, disaggregated across demographic groups; (ii) any [disparities](#) in participation across such groups; and (iii) any concrete actions being taken to ensure equal access and opportunities.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

**RATIONALE:**

Alongside eliminating bias and discrimination from recruiting and hiring practices (Targets 5.1 and 5.2), it is vital to ensure the company also has equitable and inclusive talent management systems and practices in place to retain, support, and develop talent from all backgrounds. According to the [National Study of Workplace Equity](#), workplace “inequities are often embedded in different job structures and employment systems,” from sponsorship and training approaches to performance assessments, and even separation practices.

The importance of mitigating such inequities and ensuring a fair workplace is now more important than ever. With the U.S. Supreme Court’s 2023 ruling curtailing affirmative action, traditional talent pipelines, [which are already known to](#)

[exclude marginalized groups](#), will become even less demographically diverse. Therefore, assessing and transforming talent management systems and practices to advance equity and inclusion and combat bias and discrimination is an imperative for business success. Ultimately, the goal of this Target is to level the playing field by promoting career development opportunities and well-being for all.

IMPLEMENTATION TIPS:

1. This Target does not call for and should not be read as recommending or requiring businesses to make hiring, promotion, or other employment decisions based on any protected status or characteristic in violation of any law.
2. This Target aligns with the areas highlighted in the [National Study of Workplace Equity](#) with a few exceptions: recruitment and hiring are covered by Targets 5.1 and 5.2 and compensation and benefits are covered by Standard 6 on job quality.

GUIDELINES:

1. Promote inclusion and proactively combat bias and discrimination from talent management systems and practices by taking the concrete steps outlined below for each area of talent management and formalizing the company’s practices in a written policy.
2. The policy may be integrated with the policies referenced in Targets 5.1, 5.2, 5.6, and 5.7 and should be formally approved by the most senior leader(s) with oversight of talent management, as reflected by their signature(s) on the policy.
3. **In job structures**, take at least the following concrete steps:
  - a. Adopt [skills-based](#) career ladders and job competencies for all [job types](#) and levels, including ensuring entry-level and frontline



roles have one or more avenues for advancement.

- b. Offer flexible work for as many job types and levels as possible—meaning the extent to which workers can choose when, where, and how much they work, such as working remotely or part-time. For roles where flexible work is not offered, communicate the business reason for not doing so and revisit feasibility if reasonably requested by workers.
- c. Evaluate policies and practices related to the classification of workers (e.g., exempt versus non-exempt and employee versus [contingent worker](#) classifications) to ensure they are equitable. (See also Target 6.5 on employment terms.)
- d. If the company has contingent workers, establish and broadly share the pathways to direct employment that may be available to such workers.

4. **In orientation and onboarding**, take at least the following concrete steps:

- a. Establish standardized company-wide new hire training and orientation that includes:
  - i. The company's commitment to and overview of enterprise-wide efforts to advance equity, inclusion, and social responsibility as business priorities;
  - ii. An overview of organizational and departmental goals, and how each new hire plays a role in their team's and the company's success; and
  - iii. Training on fostering a culture of safety, equity, inclusion, and belonging, including the anti-bias policy, culture

code, and reporting channels in Standard 4.

- b. Establish similar standardized new Board director orientation and onboarding, including opportunities to get to know team members from multiple functions at different levels.

5. **In mentoring and sponsorship**, take at least the following concrete steps:

- a. Establish accessible and widely communicated mentorship and sponsorship opportunities for all workers—this includes providing reasonable accommodations for people with disabilities and making such options known.
- b. Train mentors and sponsors to ensure they have the capacity and skills to offer high-quality and inclusive mentorship and sponsorship.
- c. Proactively recruit participation of workers from all backgrounds, including underrepresented groups, to ensure equal opportunities.

6. **In training and career development**, take at least the following concrete steps:

- a. Establish accessible and widely communicated training and career development opportunities for all workers—this includes providing reasonable accommodations for people with disabilities and making such options known.
- b. Support workers in upskilling by developing training and career development opportunities based on their feedback and where there may be gaps in the skills-based career ladders and job competencies.
- c. Hold leaders accountable to fostering a culture of career development, including by encouraging team members to participate in

training and career development and ensuring their workloads allow for it.

- d. Proactively recruit participation of workers from all backgrounds, including underrepresented groups, to ensure equal opportunities.

7. **In other resources and support**, take at least the following concrete steps:

- a. Provide resources and support for direct workers to participate in groups and events that promote their well-being, including employee-organized and led groups such as ERGs (employee resource groups).
- b. Ensure all resources and support available to direct workers are widely communicated and easily available for all, this includes providing reasonable accommodations for people with disabilities and making such options known.

8. **In performance assessments and feedback**, take at least the following concrete steps:

- a. Establish standardized and transparent performance assessment policies and procedures company-wide, including requiring people managers to assess team performance in an equitable and inclusive manner using skills-based and consistent criteria.
- b. Adopt 360-degree performance assessments for all [leaders](#), including skip levels and ensure feedback is fully anonymous.
- c. Incorporate qualitative self-assessments for all direct workers in annual performance reviews, including assessing their own contributions to advancing equity, inclusion, and socially responsible business practices. This will support surfacing and celebrating strong

leadership at all levels and in all functions.

- d. Foster a culture of frequent and actionable performance feedback with informal quarterly conversations between people managers and their direct reports, led by the latter and focused on recent successes, desired growth areas, and where support may be needed. This is an exercise that promotes all workers getting the feedback they need to continually improve.

9. **In advancement practices**, take at least the following concrete steps:

- a. Establish standardized and transparent advancement policies and procedures company-wide, including requiring people managers to make promotion decisions in an equitable and inclusive manner using skills-based and consistent promotion criteria.
- b. For as many job types and levels as possible, automatically consider direct workers for a promotion (or other type of advancement) after three years in a given role. See Target 5.5 for monitoring promotion rates and taking concrete action to address disparities across demographic groups.

10. **In separation practices**, take at least the following concrete steps:

- a. Conduct exit interviews for all separations and include questions on whether the employee felt a sense of inclusion and belonging while employed at the company.
- b. Avoid automated/AI-enabled employment termination decisions and processes. See also Target 6.5 on additional workforce practices to avoid including certain terms in separation letters and other exit practices.

11. Measure and track outcomes across the eight talent management areas (Guidelines 3-10 above) at least annually, including analyzing any disparities across demographic groups related to the following:

- a. Job classifications, including part-time versus full-time, exempt versus non-exempt, direct worker versus contingent worker, and temporary versus non-temporary roles.
- b. Participation rates across the various resources the company provides.
- c. Results of performance assessments.
- d. Average rates of, and time to, promotions and other career progression indicators. (See Target 5.5 for more on tracking promotion rates.)

12. While this Target applies to direct workers, if any of the company's talent management systems and practices also apply to contingent workers, measurement of progress and outcomes should include both groups of workers.

13. Take concrete action if there are disparities across any demographic groups in one or more of the eight talent management areas. The company should determine the most appropriate course of action based on its circumstances, which may include the following actions:

- a. A review or audit of the area at issue. (See Target 2.6 on independent civil rights audits.)
- b. Soliciting feedback from workers on how the relevant systems and practices can be improved, and taking concrete action based on the findings.

## Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of talent management systems and practices across the eight areas identified in the guidelines.
- Demographic data gathering and disaggregation is implemented in the company's human resources information system (HRIS) in line with Target 2.4 (disaggregating people-related data).
- At least one concrete step is codified and practiced within each talent management approach consistent with the guidelines.

## Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with [senior leadership](#).
- HRIS reflects data disaggregated across demographic groups.
- Documentation of concrete steps codified and practiced within each talent management approach.

## Relevance to Other Frameworks

*Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.*

## Resources

[The National Study of Workplace Equity](#) (Samuel Bradley, Jr. and Marcie Pitt-Catsouphe, Boston College School of Social Work and SHRM, December 2022)

[A Systems Approach to Worker Health and Wellbeing](#) (Joy Inouye and John Dony, The Campbell Institute, National Safety Council, 2017)

[Human Capital at Work: the Value of Experience](#) (Anu Madgavkar, et al., McKinsey, June 2022)

[Striving for Balance. Advocating for Change: Deloitte Global 2022 Gen Z & Millennial Survey](#) (Deloitte, 2022)

[How We Closed the Gap Between Men's and Women's Retention Rates](#) (Michelle Stohlmeyer Russell and Lori Moskowitz Lepler, Harvard Business Review, May 2017)

[STARs: Skilled Through Alternative Routes](#) (Opportunity@Work [website], accessed May 2024)

[Quality Jobs Framework](#) (Jobs for the Future, 2023)

[Job Design Framework](#) (Steven Dawson, National Fund for Workforce Solutions, accessed May 2024)

[Innovative Skills-Based Talent Practices](#) (BR Multiple Pathways Initiative, Business Roundtable, September 2022)

[Skills-Based Internal Mobility Playbook](#) (BR Multiple Pathways Initiative, Business Roundtable, September 2022)

[Multiple Pathways Initiative: Measuring the Impact of Skills-Based Talent Practices](#) (BR Multiple Pathways Initiative, Business Roundtable and Grads of Life, September 2022)

[Shining a Light on Tech's Shadow Workforce](#) (Contract Worker Disparity Project, TechEquity Collaborative, January 2022)

[Responsible Contracting Standard: Tech Companies Closing the Gap in Contract Work](#) (Contract Worker Disparity Project, TechEquity Collaborative, January 2022)

[Legal Overview of How to Make Hiring and Promoting More Equitable](#) (Allen Smith, SHRM, August 2020)

[7 Metrics to Measure Your Organization's DEI Progress](#) (Lee Jourdan, Harvard Business Review, May 2023)

[How to Effectively — and Legally — Use Racial Data for DEI](#) (Lily Zheng, Harvard Business Review, July 2023)

[Applying the ADKAR Model When Change Management is New](#) (Tim Creasey, Prosci, March 2022, last update March 2024)

[Creating Psychological Safety for Black Women at Your Company](#) (Agatha Agbanobi and T. Viva Asmelash, Harvard Business Review, May 2023)

[The U.S. Surgeon General's Framework for Workplace Mental Health & Well Being](#) (Office of the U.S. Surgeon General, U.S. Department of Health and Human Services, 2022)

[Operational Recommendations Ethnic Diversity & Inclusion](#) (B4IG Workstream on Diversity & Inclusion, Business for Inclusive Growth, October 2022)

[The High Cost of Neglecting Low-Wage Workers](#) (Joseph Fuller and Manjari Raman, Harvard Business Review Magazine, May–June 2023)



PERFORMANCE TARGET 5.4

Retention and turnover rates are regularly analyzed across demographic groups and concrete action is taken to address any disparities.

Requirement

Annually analyze [retention rates](#) and [turnover rates](#) of [direct workers](#) across [demographic groups](#) and take concrete action to address any [disparities](#).

Metric

Annual retention and turnover rates [disaggregated](#) across at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure to the workforce of any concrete actions being taken to increase retention rates and reduce turnover rates.

At least annual disclosure to the Board of current and last three years' retention and turnover rates

disaggregated across demographic groups, any disparities across such groups, and any concrete actions being taken to increase retention rates and reduce turnover rates.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

RATIONALE:

Retention and turnover rates are powerful indicators of worker satisfaction and organizational health. Low retention rates and high turnover rates are often indicators that one or more aspects of job quality are lacking, such as pay, benefits, advancement opportunities, workplace culture, or management effectiveness. Low retention and high turnover also contribute to organizational disruption and the loss of institutional knowledge. Accordingly, the company should generally strive to have high retention rates and low turnover rates for workers at all levels.

It is also important to ensure there are no disparities in retention and turnover rates across demographic groups. The existence of such disparities may be a sign of bias and discrimination in the workplace. According to research by SHRM (Society for Human Resource Management), employee turnover, absenteeism, and lost productivity due to racial inequity in the workplace [costs U.S. companies tens of billions of dollars every year](#).

Accordingly, this Target supports identifying and addressing any systemic issues of bias and discrimination that may be affecting one or more demographic groups, including

underrepresented groups, by regularly analyzing retention and turnover rates, determining the source of any disparities, and taking concrete action to address such disparities. These are key practices in building a healthy organization and promoting a workplace that is fair and inclusive for all workers regardless of their background.

IMPLEMENTATION TIPS:

1. This Target does not call for and should not be read as recommending or requiring businesses to make any employment decisions based on any protected status or characteristic in violation of any law.
2. While retention and turnover are closely related—for example, both are affected by the health of workplace culture, growth opportunities, and strong people managers—turnover calculations include new hires, while retention calculations do not. Measuring and tracking both is therefore important.
3. Adopting Target 5.3 (talent management systems), Standard 4 (workplace culture), and Standard 6 (job quality) will support success here by strengthening talent development strategies, workplace culture, and fair pay practices.

GUIDELINES:

1. On at least an annual basis, measure and analyze retention and turnover rates of direct workers across demographic groups as follows:
  - a. Review at least across race, ethnicity, gender, sexual orientation, disability, and age.
  - b. For retention, measure at least one-year, three-year and five-year retention rates.
  - c. Disaggregate results by demographic groups and by business unit, department, geography, [job function or type](#), remote versus in-office workers, frontline versus desk-based roles (as

applicable).

- d. Apply an [intersectional](#) lens in the analysis of results.
  - e. Identify any disparities across demographic groups and on an intersectional basis.
  - f. Identify any trends, such as higher or lower rates within a particular business unit, department, or location; based on tenure; associated with a particular job function, remote versus in-office workers, or frontline versus desk-based roles (as applicable); or related to the type of termination (voluntary versus involuntary, such as lay-offs and reductions in force).
  - g. For large companies, measuring more frequently (such as quarterly or monthly) is recommended to more promptly identify and address potential issues.
2. Take concrete action if there are any disparities across demographic groups. The company should determine the most appropriate course of action based on its circumstances, which may include the following actions:
- a. Conducting stay interviews and exit interviews to help determine the source of high separation rates for affected groups.
  - b. Implementing or adopting one or more actions based on learnings from stay and/or exit interviews.
  - c. Investing in enhanced anti-bias and anti-discrimination training for those involved in making employment termination decisions.
  - d. Proactively requiring an adverse impact analysis in connection with any layoffs and

reductions in force.

- e. Investing in leadership professional development (see Standard 3).
  - f. Investing in a more inclusive workplace culture (see Standard 4).
  - g. Auditing talent management systems and practices (see Target 5.3)
  - h. Offering more development and advancement opportunities (see Target 5.3).
  - i. Improving job quality (see Standard 6).
  - j. Making progress on Target 7.4 related to addressing business model red flags.
3. When sharing retention and turnover data with the Board, share first with the compensation committee given its oversight of talent practices. (See Targets 1.2 and 1.3 on Board oversight.)
4. Though this Target applies to direct workers, if the company has a [contingent workforce](#), it should also track retention and turnover rates of such workers, including across demographic groups where possible, and take concrete action where the source of issues arise from the company's own policies and practices.

### Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of current and last three years' retention and turnover rates.
- Demographic data gathering and disaggregation is implemented in the company's human resources information system (HRIS) in line with Target 2.4 (disaggregating people-related data).
- One or more concrete actions are taken annually to address any disparities in retention and turnover rates across demographic groups.

### Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with [senior leadership](#).
- HRIS reflects data disaggregated across demographic groups.
- Documentation of concrete action(s) taken to address any disparities in retention and turnover rates.

### Relevance to Other Frameworks

*Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.*

Resources

[Firm Turnover and the Return of Racial Establishment Segregation](#) (John-Paul Ferguson and Rembrand Koning, American Sociological Review, June 2018)

[Racial Inequity Persists, Costs American Workplaces Billions Annually](#) (SHRM Report, SHRM, May 2021)

[Does Your Company Offer Fruitful Careers — Or Dead-End Jobs?](#) (Ethan Rouen and Marcela Escobari, Harvard Business Review, March 2022)

[The High Cost of Neglecting Low-Wage Workers](#) (Joseph Fuller and Manjari Raman, Harvard Business Review Magazine, May–June 2023)

[To Retain Employees, Focus on Inclusion — Not Just Diversity](#) (Karen Brown, Harvard Business Review, December 2018)



PERFORMANCE TARGET 5.5

Promotion and internal hire rates are regularly analyzed across demographic groups and concrete action is taken to ensure equal opportunities for advancement.

Requirement

Annually analyze [promotion rates](#) and [internal hire rates](#) for [direct workers](#) across [demographic groups](#) and take concrete action to address any [disparities](#).

Metric

Annual promotion and internal hire rates disaggregated across at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure to the workforce of any concrete actions being taken to further promote equal opportunities for advancement.

At least annual disclosure to the Board of current and last three years’ promotion and internal hire rates disaggregated across demographic groups, any disparities across such groups, and any concrete actions being taken to ensure equal opportunities for advancement.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

RATIONALE:

Numerous studies over the past several decades have pointed to systemic bias and discrimination impeding people of color, women, and other historically [underrepresented groups](#), from advancing into managerial and leadership positions within companies. These barriers have persisted, in part, due to biases that pervade decision-making about performance and readiness of workers to be elevated into positions with greater responsibility. Monitoring advancement rates at all levels and across all functions of the company is therefore critical to ensure the company is truly an equal opportunity employer. That includes monitoring promotions as well as lateral moves and transfers, which are also [a key path to senior level roles](#).

Ensuring there are no disparities in promotion and internal hire rates across demographic groups not only is an important aspect of eliminating bias and discrimination in the

workplace, but will also support the company in building a competitive and top-performing workforce. The company’s ability to attract and *retain* a diverse workforce depends on ensuring underrepresented groups do not experience systemic barriers to advancement.

Therefore, regularly analyzing promotion and internal hire rates across demographic groups, determining the source of any disparities, and taking concrete action to address such disparities are key practices in building a workplace that is fair and inclusive for all workers regardless of their background.

IMPLEMENTATION TIPS:

- 1. This Target does not call for and should not be read as recommending or requiring businesses to make promotion or other employment decisions based on any protected status or characteristic in violation of any law.
- 2. Adopting Target 5.3 (talent management systems) and Standard 4 (workplace culture) will support success here by ensuring professional development and advancement opportunities are available to all and the workplace culture brings out the best in all workers.

GUIDELINES:

- 1. On at least an annual basis and in conjunction with promotion cycles, measure and analyze promotion and internal hire rates of direct workers across demographic groups as follows:
  - a. Review at least across race, ethnicity, gender, sexual orientation, disability, and age.
  - b. Disaggregate results by demographic groups and by business unit, department, geography, [job function or type](#), remote versus in-office workers, frontline versus desk-based roles (as applicable).

- c. Apply an [intersectional](#) lens in the analysis of results.
  - d. Identify any disparities across demographic groups and on an intersectional basis.
  - e. Identify any trends, such as higher or lower rates within a particular business unit, department, or location; based on tenure; associated with a particular job function, remote versus in-office workers, or frontline versus desk-based roles (as applicable); or related to the type of termination (promotion versus internal hiring).
  - f. For large companies, measuring more frequently (such as quarterly) is recommended to more promptly identify and address potential issues.
2. Take concrete action if there are any disparities across demographic groups. The company should determine the most appropriate course of action based on its circumstances, which may include the following actions:
- a. Conducting stay interviews and exit interviews to help determine the source of issues for affected groups.
  - b. Implementing or adopting one or more actions based on learnings from stay and/or exit interviews.
  - c. Investing in enhanced anti-bias and anti-discrimination training for those involved in making promotion and internal hiring decisions.
  - d. Aligning the timing of anti-bias training for people managers to just before promotion cycles. [Learn more here about the positive impact of this practice.](#)
- e. Tracking additional data points related to advancement, such as (i) the average period of time to advancement across demographic groups and (ii) any trends in the workers [appointed to acting/interim roles, using learning and development opportunities, and receiving stretch assignment opportunities.](#)
  - f. Investing in leadership professional development (see Standard 3).
  - g. Investing in a more inclusive workplace culture (see Standard 4).
  - h. Auditing talent management systems and practices (see Target 5.3).
  - i. Implementing standardized and transparent promotion and internal hiring procedures (see Target 5.3).
  - j. Offering more development and advancement opportunities (see Target 5.3).
3. When sharing promotion and internal hire data with the Board, share first with the compensation committee given its oversight of talent practices. (See Targets 1.2 and 1.3 on Board oversight.)

## Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of current and last three years' promotion and internal hire rates.
- Demographic data gathering and disaggregation is implemented in the company's human resources information system (HRIS) in line with Target 2.4 (disaggregating people-related data).
- One or more concrete actions are taken annually to address any disparities in promotion and internal hire rates across any demographic groups.

## Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with [senior leadership](#).
- HRIS reflects disaggregated data across demographic groups.
- Documentation of concrete action(s) taken to address any disparities in promotion and internal hire rates.

## Relevance to Other Frameworks

*Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.*

## Resources

[Quality Jobs Framework](#) (Jobs for the Future, 2023)

[Incorporating DEI into Decision-Making](#) (Edward Chang, et al., Harvard Business Review, September 2023)

[Does Your Company Offer Fruitful Careers — Or Dead-End Jobs?](#) (Ethan Rouen and Marcela Escobari, Harvard Business Review, March 2022)

[How to Reduce Bias in Your Succession and Promotion Plans](#) (Vibhas Ratanjee and Andrew Green, Gallup, June 2018)

[6 Behavioral Nudges to Reduce Bias in Hiring and Promotions](#) (Paola Cecchi-Dimeglio, Harvard Business Review, November 2022)

[The DE&I Metrics That Really Matter](#) (Andrés T. Tapia, et al., Korn Ferry, 2022)

[Up Isn't the Only Way: a New Approach to Career Progression](#) (Eugene Chang and Michel Buffet, Korn Ferry, 2020)

[Review of Research Literature that Provides Evidence of the Impact of Diversity and Inclusion in the Workplace](#) (Vicky Whiting, Financial Conduct Authority of the United Kingdom, July 2021)

[Human Capital at Work: the Value of Experience](#) (Anu Madgavkar, et al., McKinsey, June 2022)

[Skills-Based Internal Mobility Playbook](#) (BR Multiple Pathways Initiative, Business Roundtable, September 2022)



PERFORMANCE TARGET 5.6

Senior leadership development, succession planning, and recruitment practices ensure equal opportunities for all.

Requirement

Proactively combat bias and discrimination in building effective [senior leadership](#) teams through multiple concrete steps related to leadership development, succession planning, and recruitment practices.

Metrics

**Policy metric:** one or more written policies integrating the practices in the guidelines.

**Practice metric:** [demographic](#) composition of current and last three years’ senior leaders, [disaggregated](#) across at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual public disclosure of [Form EEO-1](#) (or equivalent).

Annual disclosure to the workforce of the opportunities for leadership development and sponsorship and any other concrete actions being taken that the workforce can support and/or participate in.

At least annual disclosure to the Board of (i) current and last three years’ demographic composition of senior leadership; (ii) leadership succession plans; (iii) promotion and internal hire rates at senior and middle-management levels, disaggregated across demographic groups; (iv) any [disparities](#) across such groups; and (v) any concrete actions being taken to ensure equal opportunities for leadership.

Avoid sharing disaggregated demographic data when group sizes are too small to ensure individual anonymity (typically N < 25).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

**[RATIONALE:](#)**

The value proposition for companies to increase the [diversity](#) of their senior leadership teams is powerful. According to a [2023 study by As You Sow](#), “higher percentages of BIPOC (non-White) management are positively correlated with increases in enterprise value growth rate, free cash flow per share, income after tax, long-term growth mean, 10-year price change, mean return on equity (ROE), return on invested capital (ROIC), and 10-year total revenue compound annual growth rate (CAGR).” This builds on a growing body of research that businesses with diverse executive teams are [more likely to financially outperform competitors lacking in diversity at](#)

[executive levels](#).

This Target supports the company with key practices that aim to combat bias, promote equal opportunities, and effectively build senior leadership teams with all the skills for business success, including the core competencies to advance [equity](#), [inclusion](#), and social responsibility.

**[IMPLEMENTATION TIPS:](#)**

1. This Target does not call for and should not be read as recommending or requiring businesses to make hiring, promotion, or other employment decisions based on any protected status or characteristic in violation of any law.
2. Adopting Target 1.4 (leadership accountability), Standard 3 (leadership skill building), and Targets 5.1-5.3 (recruiting, hiring, and talent management) will support success here by defining leadership goals, supporting skill building, and building a well-qualified diverse talent pipeline for leadership.

**[GUIDELINES:](#)**

1. Proactively combat bias and discrimination in senior leadership development, succession planning, and recruitment by taking the concrete steps outlined below for each and formalizing the company’s practices in a written policy.
2. The policy may be integrated with the policies referenced in Targets 5.1, 5.2, 5.3, and 5.7 and should be formally approved by the most senior leader(s) with oversight of talent management, as reflected by their signature(s) on the policy.
3. **In senior leadership development opportunities**, take at least the following concrete steps:
  - a. Offer professional development opportunities to all [leaders](#), including on building skills in advancing equity, inclusion, and socially

responsible business practices.

- b. If the company offers sponsorship opportunities, ensure they are available to all leaders.
  - c. Monitor participation rates across demographic groups in both of the above and take concrete action if participation is low among any [underrepresented groups](#), such as investing in more outreach and soliciting feedback on any barriers to participation and/or how to make offerings more compelling.
4. **In senior leadership succession planning**, take at least the following concrete steps:
- a. Annually assess and track demographic diversity across all functions and career levels within leadership ranks, including middle management and those positioned for advancement to senior leadership. (See Target 2.4 on disaggregating people-related data.)
  - b. Apply “opt-out” versus “opt-in” processes that apply to all leaders situated at the appropriate career levels when considering potential successors for senior leadership roles. [A recent study shows this helps to ensure all well-qualified potential candidates are considered.](#)
5. **In senior leadership recruitment**, take at least the following concrete steps:
- a. When looking externally to fill senior leadership roles, follow the guidelines in Targets 5.1 and 5.2 to ensure recruitment practices cast the net wide for talent and that interviewing, deliberations, and the offer process support equal opportunities for all qualified talent.

- b. For senior leadership roles that can be filled internally:
    - i. Widely communicate about the opportunity, including the hiring criteria and the anticipated process.
    - ii. Apply “opt-out” versus “opt-in” processes that apply to all leaders situated at the appropriate career levels.
6. If labor market data evidences significant underrepresentation of any demographic groups for any senior-level job types, take concrete action to foster increased demographic diversity of such talent. The company should determine the most appropriate course of action based on its circumstances, which may include taking some of the concrete actions listed in Target 5.1 Guideline 5
7. When sharing gap analysis results and updates with the Board, share first with the compensation committee given its oversight of talent practices. (See Targets 1.2 and 1.3 on Board oversight.)

Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of practices related to leadership development, succession planning, and recruitment.
- Demographic data gathering and disaggregation is implemented in the company's human resources information system (HRIS) in line with Target 2.4 (disaggregating people-related data).
- At least two concrete steps are codified and practiced in each of leadership development, succession planning, and recruitment consistent with the guidelines.

Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with senior leadership and the Board.
- HRIS reflects disaggregated data across demographic groups.
- Documentation of concrete steps codified and practiced related to leadership development, succession planning, and recruitment.

Relevance to Other Frameworks

*Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.*

Resources

[Capturing the Diversity Benefit: Workplace Diversity Linked to Financial Performance](#) (Meredith Benton and Kaitlyn Ng, As You Sow, November 2023)

[Disrupt Bias Drive Value](#) (Sylvia Ann Hewlett, Ripa Rashid, and Laura Sherbin, Coqual, 2017)

[How Diverse Leadership Teams Boost Innovation](#) (Rocío Lorenzo, et al., The Boston Consulting Group, 2018)

[If There's Only One Woman in Your Candidate Pool, There's Statistically No Chance She'll Be Hired](#) (Stefanie K. Johnson, David R. Hekman, and Elsa T. Chan, Harvard Business Review, April 2016)

[Approaching Diversity with the Brain In Mind](#) (Khali Smith and David Rock, PwC Strategy + Business, June 2018)

[The Mansfield Rule: Boosting Diversity in Leadership](#) (Diversity Lab, accessed May 2024)

[Challenges Continue Regarding Expanding Diversity in The Boardroom and C-Suites](#) (Esther G. Lander, Richard J. Rabin, and Anastasia Kerdock, Harvard Law School Forum on Corporate Governance, May 2023)

[Industry Actions for Racial Equity – Investment Management: Workplace Transformation Guide](#) (W.K. Kellogg Foundation Expanding Equity Program, Expanding Equity and W.K. Kellogg Foundation, May 2023)

[46 Diversity in the Workplace Statistics to Know](#) (Bailey Reiners, Built In, March 2024)

[Measuring the Impact of Skills-Based Talent Practices](#) (BR Multiple Pathways Initiative, Business Roundtable and Grads of Life, September 2022)

[The DE&I Metrics that Really Matter](#) (Andrés T. Tapia, et al., Korn Ferry, 2022)



PERFORMANCE TARGET 5.7

Board director recruitment, appointments, and evaluation practices ensure equal opportunities and strive for a fit-for-purpose Board.

Requirement

Proactively combat bias and discrimination in the composition of the Board of Directors through multiple concrete steps related to director recruitment, appointments, and evaluation practices, and strive for an overall Board composition that is fit-for-purpose.

Metrics

**Policy metric:** one Board competencies matrix (or skills matrix) consistent with the guidelines.

**Practice metric:** [demographic](#) composition of the Board, [disaggregated](#) across at least race, ethnicity, gender, sexual orientation, disability, and age.

Share Progress & Achievement

Annual disclosure available to the public describing the demographic [diversity](#) of the Board on an aggregate and no-names basis (and based on the consent of individual Board directors), either on the company’s website or in an annual report (or other publicly available filing).

At least annual disclosure to the Board of (i) the latest competencies matrix and any gaps and/or material changes, (ii) current demographic composition of the Board (aggregated, no names basis), (iii) new director pipeline, and (iv) any concrete actions being taken to close any competency gaps (whether through Board education and/or new director recruitment).

(Disclosures related to this Target are not intended to require disclosure of any information under attorney client privilege or attorney work product protections.)

Rationale, Tips, and Guidelines

RATIONALE:

In boardrooms across the U.S., people of color, women, and other historically marginalized groups are dramatically underrepresented. Yet, numerous studies and a growing consensus support the proposition that the demographic diversity of boards is linked to improved oversight of business risks and opportunities, better decision-making, and superior business outcomes. [While some progress has been made, much more is needed.](#)

Like Target 5.6, this Target supports the company with key practices that aim to combat bias, promote equal opportunities, and foster a Board that is fit-for-purpose with the key competencies to effectively oversee the company’s overall efforts, including efforts to advance [equity](#), [inclusion](#), and social responsibility as strategic business priorities.

IMPLEMENTATION TIPS:

1. This Target does not call for and should not be read as recommending or requiring businesses to make Board appointments, evaluate Board directors, or make other related decisions based on any protected status or characteristic in violation of any law.
2. Many companies already use a Board skills matrix to support Board composition planning. The guidelines below may be incorporated in such an existing matrix.
3. This Target intentionally uses the term “competencies matrix” instead of “skills matrix” to denote the inclusion of critical knowledge and behaviors along with hard skills and expertise.
4. Adopting Standard 3 (leadership and board skills) will support success here by ensuring that ongoing Board education includes skill building related to overseeing equity, inclusion, and social responsibility efforts.
5. Closely coordinate with the Board chair and, as applicable, the chair of the nominating and governance committee given its oversight of Board composition. (See Targets 1.2 and 1.3 on Board oversight.)
6. A sample Board competencies matrix consistent with the guidelines below will be included with this Target upon the launch of the final Standards.

GUIDELINES:

1. Develop a competencies matrix for the highest governing body of the company (typically a Board of Directors) reflecting the knowledge, skills, expertise, and behaviors that it should possess for the effective oversight of the company’s efforts to advance equity, inclusion, and socially responsible business practices, including at least the following:

**a. Under “knowledge,” include the following as the areas all Board directors should have some level of knowledge about:**

- i. The current and projected workforce demographics within the company’s industry and geography.
- ii. Each of the learning areas listed in Target 3.1 focused on ongoing Board education.

**b. Under “skills,” include the following as the skills one or more Board directors possess, striving for all directors over time:**

- i. Change management, including navigating backlash and resistance to equity, inclusion, and social responsibility efforts.
- ii. Fostering equity and inclusion in Board meetings and decision-making.

**c. Under “expertise,” include the following as the specific fields in which one or more Board directors have strong proficiency, skill, or mastery:**

- i. Respecting civil and human rights.
- ii. Advancing diversity, equity, and inclusion.
- iii. Implementing environmental and social sustainability strategies (including related to climate change and natural resource use).
- iv. If the company has a frontline workforce, expertise championing the needs and challenges of frontline workers, which

may include appointing a current or former frontline worker to the Board.

**d. Under “behaviors,” include the following as the critical ways all Board directors should conduct themselves:**

- i. Adherence to the behaviors codified in the company’s culture code per Target 4.3, as applicable to the Board setting.
- ii. Expanding professional networks to groups and organizations that proactively include leaders and/or corporate directors from [underrepresented groups](#) and to groups and organizations that focus on advancing sustainability, equity, inclusion, and social responsibility in business.

**2. Populate and use the competencies matrix as follows:**

- a. At least annually, directors should review and self-identify (or update) their competencies across the matrix. Consider including a simple rating system so directors can indicate existing strengths and areas under development.
- b. Update the matrix upon any shifts in Board composition.
- c. Use the matrix to inform ongoing Board education topics as well as director recruitment, appointments, and evaluation efforts.

**3. Proactively combat bias and discrimination in director recruitment, appointments, and evaluation practices by taking the concrete steps outlined below for each and formalizing the company’s practices in a written policy.**

**4. The policy may be integrated with the policies referenced in Targets 5.1, 5.2, 5.3, and 5.6 and should be formally approved by the most senior leader(s) with oversight of talent management, as reflected by their signature(s) on the policy.**

**5. In director recruitment efforts, take at least the following concrete steps:**

- a. Use the competencies matrix to inform recruiting needs, as well as in conducting screening, interviews, and deliberations.
- b. Establish a diverse pipeline of well-qualified directors from all backgrounds through the following actions:
  - i. Debiasing board director role descriptions.
  - ii. Explicitly stating in such descriptions the company’s aspiration for a diverse Board composed of people from all backgrounds and its commitment to equity and inclusion.
  - iii. Providing Board candidates the option to share their demographic backgrounds; however, ensure that such information is handled in line with applicable privacy laws and is not accessible to individuals making appointment decisions.
  - iv. Sharing board opportunities with, and sourcing candidates from, business affinity organizations that cater to board-ready underrepresented leaders, including people of color, women, LGBTQ+ people, and people with disabilities.

- v. Requiring search firms to cast the net wide, including sourcing well-qualified candidates from underrepresented groups.
  - c. Consider increasing the size of the Board to accommodate gaps in the board competencies matrix.
  - d. For private companies, consider bringing on one or more independent directors to meet any Board competency gaps.
- 6. **In director appointment processes**, take at least the following concrete steps:
  - a. Establish objective, consistent, and transparent director qualifications and interview questions for all interviewers to follow, including questions based on the competencies matrix.
  - b. Do not consider or make any decisions based on a candidate's protected status or characteristics.
  - c. Explicitly confirm potential candidates have the time to dedicate to a new director role, including ensuring they are not [overboarding](#).
- 7. **In director evaluations**, take at least the following concrete steps:
  - a. Annually conduct a Board self-evaluation in which each director assesses the following, informed by the competencies matrix:
    - i. Their own performance;
    - ii. The performance of the Board and committee chairs; and
    - iii. The performance of the Board overall.
  - b. Collaborate with the Board chair (and, if

applicable, the chair of the nominating and governance committee) in taking concrete action based on the results of the annual evaluation. This should include one-on-one meetings with each director to discuss their performance. [Learn more about the positive role annual Board evaluations can play.](#)

## Example Interim Targets

*Note: these examples are not intended to be exhaustive. At launch, guidance on setting interim targets will be available.*

- [Gap analysis](#) conducted of Board competencies and practices related to director recruitment, appointment, and evaluation.
- If demographic information and competencies of the Board are not collected or tracked yet, data gathering in line with Target 2.4 is conducted and an initial draft of the competencies matrix is prepared.
- Board directors self-identify their competencies in the matrix.
- At least two concrete steps are codified and practiced for each category of action (director recruitment, appointments, and evaluation) consistent with the guidelines.

## Example Interim Metrics

*Note: some metrics may apply to more than one Example Interim Target; not necessarily one-to-one alignment.*

- Record of gap analysis results shared with [senior leadership](#).
- Board demographic data repository reflects disaggregated data.
- Documentation of completed Board competencies matrix.
- Documentation of concrete steps codified and practiced related to leadership development, succession planning, and recruitment.



Relevance to Other Frameworks

Coming with the launch of the final standards: mapping to other standards and frameworks that address similar issues.

Resources

[Missing Pieces Report: A Board Diversity Census of Women and Underrepresented Racial and Ethnic Groups on Fortune 500 Boards, 7th Edition](#) (Alliance for Board Diversity and Deloitte, 2023)

[Today’s Boardroom: Confronting the Change Imperative: PwC’s 2023 Annual Corporate Directors Survey](#) (PwC Governance Insights Center, 2023)

[Dispel the Myth of 'Fit': Improve Diversity on Your Board](#) (Jim DeLoach, National Association of Corporate Directors, January 2021)

[NACD Shines Light on Board Culture in New Blue Ribbon Commission Report](#) (NACD Blue Ribbon Commission, National Association of Corporate Directors [press release], September 2023)

[LGBTQ+ Board Diversity: Progress & Possibility](#) (OutQUORUM, Out Leadership, April 2023)

[Approaching Diversity with the Brain In Mind](#) (Khali Smith and David Rock, PwC Strategy + Business, June 2018)

[How to Advance Corporate Diversity in Compliance with the Law: A Toolkit](#) (Ronald C. Machen, et al., WilmerHale, 2021)

[If There’s Only One Woman in Your Candidate Pool, There’s Statistically No Chance She’ll Be Hired](#) (Stefanie K. Johnson, David R. Hekman, and Elsa T. Chan, Harvard Business Review, April 2016)

[Recent Trends in Board Composition and Refreshment in the Russell 3000 and S&P 500](#) (Matteo Ronello, Harvard Law School Forum on Corporate Governance, December 2023)

[Director Overboarding: Global Trends, Definitions, and Impact](#) (Kosmas Papadopoulos, Harvard Law School Forum on Corporate Governance, August 2019)

[Thirty Percent Coalition](#) (Thirty Percent Coalition [website], accessed May 2024)

[Take Your Seat](#) (Take Your Seat [website], accessed May 2024)

[You Say You Want a More Diverse Board. Here’s How to Make It Happen.](#) (Maria Moats and Paul DeNicola, Harvard Business Review, March 2021)

CORPORATE RACIAL EQUITY ALLIANCE

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