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CFA INSTITUTE DIVERSITY, EQUITY AND INCLUSION CODE (USA AND CANADA)

EXPOSURE DRAFT

Preamble

In March 2020, CFA Institute Inclusion & Diversity Steering Committee tasked the Diversity, Equity and Inclusion (DEI) Code Working Group (USA and Canada) with developing a set of principles to drive greater diversity, equity and inclusion within the investment industry. Given CFA Institute’s reputation for rigor and high standards, as well as its focus on comprehensive strategies for effecting change, the DEI Code Working Group took an immersive approach.

The DEI Code Working Group, itself a highly diverse team, consists of members of CFA Institute Inclusion & Diversity Steering Committee, DEI practitioners, and investment professionals. The Group shared a common belief that progress required commitment from the senior leaders at investment organizations who would have to both lead by example and hold their organizations accountable. The Group settled on six core principles that would require the support of the leadership: Pipeline, Talent Acquisition, Promotion and Retention, Leadership, Influence, and Measurement. Each organization must commit to working on these core principles while collaborating with others in the field, working purposefully toward the goals, and promoting the ideals throughout the industry.

The Working Group is aware that the industry comprises a diverse set of institutions of different sizes, each with different starting points and tool kits. As a result, the Group wanted to focus on principles that were appropriate for all signatories but accommodative of many different implementation strategies. Considerable time was invested in developing a variety of recommended implementation strategies for each principle so that each signatory could choose the mix appropriate for their institution. These strategies appear in the Implementation Guidance, which supports the DEI Code. The Group understands that not all organizations have the same capacity or start from the same place, but the expectation is that all signatories to the DEI Code will commit to real change, to making tough decisions, and to making the necessary investment of resources. Moreover, all signatories will commit to continuous improvement.

Looking critically at your organization and committing to making sustained change is never easy, and the investment industry has made attempts before without lasting impact. However, CFA Institute and those charged with designing the DEI Code know that this commitment will lead to greater inclusion of wider viewpoints from the best talent, which will result in better investment outcomes and help create better working environments.

– The Diversity, Equity and Inclusion Code Working Group
As the first female President and CEO of CFA Institute, I may be evidence of the progress the investment industry is making on gender diversity, but I am also profoundly disappointed by its inability to grapple with the broader issues of diversity, equity and inclusion. It is my sincere hope that this first draft of our Diversity, Equity and Inclusion Code will be an accelerant to igniting the change we need across the investment profession.

We at CFA Institute are not perfect—far from it. But we believe we can partner with organizations across the industry to produce meaningful results that provide a model for others to follow. We advocate for professional excellence and for adherence to upholding ethical standards, and our existing codes and standards are how we hold ourselves accountable for doing so.

We know there is more work to do, and I commit CFA Institute to being the first signatory of this new Diversity, Equity and Inclusion Code upon release of the final version.

Contributors

CFA Institute Inclusion & Diversity Steering Committee:

John Adler, Director, Mayor’s Office of Pensions and Investments, Chief Pension Investment Advisor for the Mayor, New York City Mayor’s Office

Christopher Ailman, CalSTRS

Beth Bonacquist, Senior Advisor to the Executive Director & Chief Investment Officer, NYSTRS

Katherine Jollon Colsher, CEO, Girls Who Invest

Frank Dobbin, PhD, Henry Ford II Professor of the Social Sciences, Harvard University

Ève Giard, Executive Vice-President, Talent and Performance, CDPQ

Orim Graves, CFA, Managing Partner, David Hill Group

Lori Heinel, CFA, Global Chief Investment Officer, State Street Global Advisors

Kim Lew, CFA, President and CEO, Columbia Investment Management Company

Amy McGarrity, CFA, Chief Investment Officer, Colorado Public Employees’ Retirement Association (CoPERA)

Daniel Miller, Deputy Executive Director, NYC Board of Education Retirement System
René Picazo, Head of Wealth Client Group, Wells Fargo Asset Management
Marlene Timberlake D'Adamo, Chief Compliance Officer, CalPERS
Wylie Tollette, CFA, Head of Client Investment Solutions, Franklin Templeton Multi-Asset Solutions
Michael Trotsky, CFA, Executive Director and Chief Investment Officer, Massachusetts Pension Reserves Investment Management (PRIM) Board
Beth Tyndall, Chief People Officer, OTPP

**DEI Code Working Group:**
Dominique Cherry, Head of Private Markets, Philadelphia Board of Pensions and Retirement
Orim Graves, CFA, Managing Partner, David Hill Group
Keon Holmes, CFA, Managing Director, Cambridge Associates
Erinn King, CFA, Managing Director, Payden & Rygel Investment Management
Archana Kumar, Chief Operating Officer, Northern Trust Asset Management
Kim Lew, CFA, CEO, Columbia Investment Management Company
Marlene Timberlake D'Adamo, Chief Compliance Officer, CalPERS
Wylie Tollette, CFA, Head of Client Investment Solutions, Franklin Templeton Multi-Asset Solutions – supported by Kimberly Strand, CFA, Head of Fundamental Research & ESG Integration, Franklin Templeton
Sarah Maynard, ASIP, CFA Institute, Global Head, External I&D
Justine Phoenix, Head of Diversity Project North America, Nicsa

We are grateful to the following individuals and teams who contributed comments or provided their feedback on the initial version of this Code:
LaShae Badelita, Investment Diversity Officer, CalSTRS
Matthew Smith, Senior Managing Director of Talent, OTPP
Amanda Holmes, Director, Talent Acquisition, OTPP
Diversity & Inclusion Council, CalPERS
Christine James, CFA, Managing Director, Head of Business Development, Wealth Client Group, Wells Fargo Asset Management
Geordie Hungerford, CFA, CEO, First Nations Financial Management Board
Scott Munro, Acting Director, Corporate Services, First Nations Financial Management Board
Brian Swain, Deputy Chief Investment Officer, Howard University
Linda Brenner, Senior Director, Industry Operations and Diversity & Inclusion, Investment Company Institute
Tracey Wingate, Chief of Staff to Eric Pan, CEO and President of Investment Company Institute
Karen L. Barr, President and CEO, Investment Adviser Association
Gilbert Garcia, CFA, Principal, Garcia Hamilton Associates LP, and SEC Asset Management Advisory Committee member
Hank Kim, Executive Director and Counsel, National Conference on Public Employee Retirement Systems (NCPERS)
Tony Roda, Principal, Williams & Jensen, and Government Relations Adviser, NCPERS
Jennifer Choi, Managing Director, Industry Affairs, Institutional Limited Partners Association (ILPA)
Michelle Noyes, Managing Director, Head of Americas, The Alternative Investment Management Association Limited (AIMA)
Adam Jacobs-Dean, Managing Director, Global Head of Markets, Governance and Innovation, AIMA
Elena Espinoza, Interim Head, Social Issues, UN Principles for Responsible Investment (PRI)
Dustyn Lanz, CEO, Responsible Investment Association
Bryan McGannon, Director of Policy and Programs, US SIF: The Forum for Sustainable and Responsible Investment
Ginny Brooks, Policy and Programs Staff Associate, US SIF: The Forum for Sustainable and Responsible Investment
Deborah McLean, Managing Director of Global Relations, CAIA Association
Lindsey Keljo, Managing Director, Asset Management Group and Associate General Counsel, SIFMA
Timothy W. Cameron, Managing Director, Head of SIFMA Asset Management Group, SIFMA
Jeffrey P. Mahoney, General Counsel, the Council of Institutional Investors
Jim Fitzpatrick, President and CEO, Nicsa
Dan Houlihan, Head of Asset Servicing, Americas, Northern Trust Corporation
CEO Advisory Council, Diversity Project North America
CFA Societies Canada Diversity & Inclusion Working Group
Susan Farris, CFA, Board Chair, CFA Society Boston
Jeanne Wolf, Executive Director, CFA Society Boston
Kweku Obed, CFA, Managing Director, Marquette Associates
Justin Bullion, CFA, Managing Director, Payden & Rygel Investment Management
Alfred Giles, CFA, Director, Head of Corporate Research, Payden & Rygel Investment Management
Regina Curry, Chief Diversity Officer, Franklin Templeton
Deidra Jenkins, Chief Diversity, Equity and Inclusion Officer, Americas, Northern Trust Corporation
Diane Hughes, Global Head, Talent Acquisition & Human Resources Strategy, Northern Trust Corporation
Jean Doyle, Human Resources Business Lead, Northern Trust Asset Management
Elizabeth Lance, Vice President & Legal Counsel, Legislative and Regulatory Affairs, T. Rowe Price
Bob Grohowski, Vice President & Senior Legal Counsel, Legislative and Regulatory Affairs, T. Rowe Price
CFA Institute Advocacy Team
CFA Institute Credentialing General Education Team
CFA Institute Institutional Relations Team
CFA Institute Legal Team
CFA Institute Internal I&D Team
CFA Institute Compliance Team
Executive Summary

Our Purpose
We recognize that a diversity of perspectives will lead to better investor outcomes; an inclusive investment industry will better serve our diverse society. Further, we recognize that an organization with an inclusive culture, awareness and education, and effective working relationships is a better place to work. We also understand the importance of improving equity while acknowledging the magnitude of the task. Therefore, our scope is within the workplace where we have direct agency and where we have influence as investors.

An Introduction to the Six Principles

**Principle 1:** Pipeline – We commit to expanding the pipeline of diverse talent.

**Principle 2:** Talent acquisition – We commit to designing and implementing inclusive and equitable hiring and onboarding practices.

**Principle 3:** Promotion and retention – We commit to designing and implementing inclusive and equitable promotion and retention practices to reduce barriers to progress.

**Principle 4:** Leadership – We commit to using our position and voice to promote DEI and improve DEI outcomes in the investment industry and to being held responsible for our firm’s progress.

**Principle 5:** Influence – We commit to using our role, position, and voice to promote and increase measurable DEI results in the investment industry.

**Principle 6:** Measurement – We commit to measuring and reporting on our progress in driving better DEI results within our firm. We will provide regular reporting on our firm’s DEI metrics to our senior management, our board, and CFA Institute.

In addition to the Principles, we undertake to accelerate and amplify their impact by agreeing to:

- COLLABORATE with other firms to publicize careers in the investment industry and provide informational materials, combined with concerted outreach.
- SHARE with other signatories tried and tested DEI practices and work together to develop new, aspirational strategies to drive progress.
- PROMOTE acceptance and implementation of the Principles within the investment industry by speaking about our progress and socializing the DEI Code and the Principles with our global workforce and colleagues.

In Canada, we commit to implementing the Truth and Reconciliation Commission of Canada Call to Action #92, and we embrace Indigenous reconciliation.
The Diversity, Equity and Inclusion Code (USA and Canada)

Preface

We trust signatories will be able to demonstrate innovation in their approach to these principles. The Principles are intended to be additive to existing commitments because they are specifically designed for the investment industry. In creating this Code, we consulted extensively with a range of industry trade bodies, other stakeholders, and regulators as we reviewed existing pledges and frameworks.

We ask at the outset that signatories commit to reporting on those metrics that are relevant to their organizations. The purpose of this DEI Code is to meet the industry where it is, define the current state, and drive improvement from a realistic foundation. We have designed a Reporting Framework to guide signatories in this process.

Following public commitment to the Principles, signatories will confidentially report on their progress annually to CFA Institute Code & Standards and External Inclusion & Diversity teams using the Reporting Framework. In turn, CFA Institute will report on industry-level statistics. Firms will be given bespoke, private feedback on their reports relative to the industry. Individual company details will be kept confidential, although with their agreement, firms’ progress may be showcased. CFA Institute will convene annual roundtables for signatories to share their practices and explore new ideas. Therefore, accountability for impact is a critical factor for all entities involved.

The Principles are metrics based, not merely aspirational or a paid-for designation. Their successful integration requires commitment, not only a compliance-led approach. We recognize, however, that compliance is a helpful tool for level-setting in this work. The Implementation Guidance, a core component of this Code, is not an exhaustive list and will be annually revised and updated by CFA Institute to reflect effective, tested DEI practice, including that of signatories.

Diverse Groups

This is an indicative list for consideration; it does not just designate legally protected groups. Further detailed and regionally differentiated information appears in the Implementation Guidance.

- Gender
- Gender expression
- Sexual orientation
- Race
- Ethnicity
- Veteran status
- Generation (e.g., Gen Z, millennials, Gen Y, seniors, etc.)
### Definition of Diversity

The full spectrum of human attributes, perspectives, identities, and backgrounds.

### Definition of Equity

Fairness of access, opportunity, and advancement for all within an organization, which requires eliminating barriers and root causes that have prevented underrepresented groups from full participation within the workplace.

### Definition of Inclusion

A dynamic state of operating in which any employee can be and feel respected, valued, safe, and fully engaged.

**Diversity, Equity and Inclusion** are referred to together in this document as **DEI**. We note, however, that equity is at a very early stage of development in the investment industry; it is included as a long-term goal for firms.

### Definition of Reconciliation for Firms Operating in Canada

“Call to Action 92” states:

We call upon the corporate sector in Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operational activities involving Indigenous peoples and their lands and resources.

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<table>
<thead>
<tr>
<th>Indigenous groups</th>
<th>Socioeconomic status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neurodiversity</td>
<td>Educational training</td>
</tr>
<tr>
<td>Ability (e.g., vision, hearing, speech, mobility, learning differences, etc.)</td>
<td>Other, such as citizenship status, persons with criminal records, and non-native-language speakers</td>
</tr>
</tbody>
</table>
The Principles

We as signatories of the CFA Institute DEI Code commit to the following principles:

**Principle 1: Pipeline** – We commit to expanding the diverse talent pipeline.

**Definition:**
Expanding a diverse talent pipeline of prospective employees is critical to the investment industry’s long-term success.

**Commitment:**
To tackle the difficulty, driven at times by perceptions of scarcity, in sourcing diverse talent, we commit to continued outreach to attract capable but often overlooked individuals from underrepresented groups. We will raise awareness among students prior to college (both public schools and private schools catering to lower-income student bodies), including those in Indigenous communities; among those at various higher-education institutions, such as Historically Black Colleges and Universities (HBCUs), Hispanic-Serving Institutions (HSIs), and Indigenous-focused institutions and programs; and among other underserved groups that have not historically been attracted to a career in financial services, including those in affinity groups at predominantly white institutions (PWI). We also commit to collaborative outreach with other organizations, because we recognize that only through sustained, systematic effort to build capacity and awareness across populations can the lack of diversity in our industry be addressed.

**Principle 2: Talent acquisition** – We commit to designing and implementing inclusive and equitable hiring and onboarding practices.

**Definition:**
Ensuring that all aspects of hiring practice are inclusive, from intern and graduate recruitment to experienced hires and senior roles, is critical to improving diversity.

**Commitment:**
We commit to creating, implementing, and regularly reviewing robust talent acquisition processes and policies, such as anti-bias training for hiring managers, interviewers, and recruiters, as well as to driving positive progress in the diversity of the workforce. We commit to systematic outreach to attract talented but often overlooked individuals from underrepresented groups into our organization. Some firms cite difficulty in finding diverse individuals via traditional routes, so we will therefore explore more inclusive sources of candidates. We also commit to collaborating with other organizations to identify and drive better DEI practices in external recruitment, including hiring for cultural add rather than cultural fit and modifying practices to consider a wider range of education level, degree type, and experience. We also commit to ensuring that once diverse talent is acquired, we will alter our onboarding policies to make sure the process feels inclusive to all parties.
**Principle 3:** Promotion and retention – We commit to designing and implementing inclusive and equitable promotion and retention practices to reduce barriers to progress.

**Definition:**

*Promotion* involves ensuring that all aspects of access to training and development—including mentorship and sponsorship, progression, new opportunities, and appraisal processes—are equitable and inclusive and seek to address inequities resulting from systemic racism and other forms of bias. Promotion covers intermediate step opportunities and individual recognition, which can be crucial in building employee visibility and experience.

*Retention* involves designing and maintaining inclusive retention and support systems, such as mentorship and sponsorship, work–life accommodations, and efforts to eliminate harassment, which can be a principal cause of departure. To further equity, this work requires identifying barriers to historically underrepresented employees’ progress, as well as valuing their contribution. This may include accommodating obligations of Indigenous people to participate in and lead initiatives within their communities and Indigenous governments where applicable.

**Commitment:**

We commit to creating, implementing, and regularly reviewing robust processes. This work will be supported by manager, senior leader, and wider organizational cultural training to embed inclusive and equitable practices.

**Principle 4:** Leadership – We commit to using our position and voice to promote DEI and improve DEI outcomes in the investment industry and to being held responsible for our firm’s progress.

**Definition:**

Leaders set the standards and expectations for inclusive behavior, model the behavior, and help define their firms’ culture by example, both internally and externally. To drive progress, leadership must be diverse, inclusive, accountable to stakeholders, and trained to manage and lead diverse teams at all leadership levels within the organization.

**Commitment:**

We commit to using our role as leaders to create robust leadership development processes. These processes should focus specifically on building understanding, increasing awareness, improving skills, and changing behavior around DEI within the workforce, along with ongoing implementation and regular review of those processes by our senior leaders.
**Principle 5: Influence** – We commit to using our role, position, and voice to promote and increase measurable DEI results in the investment industry.

**Definition:**
As asset owners, allocators, and consultants, we have the ability to encourage and motivate our asset managers and other providers of industry services to adopt the Principles of this Code as well as practices that promote greater DEI within the investment industry.

**Commitment:**
We commit to the creation of robust, regular review processes for service providers, sub-advisors and vendors with respect to DEI practices proportionate to our firm’s size.

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**Principle 6: Measurement** – We commit to measuring and reporting on our progress in driving better DEI results within our firm. We will provide regular reporting on our firm’s DEI metrics to our senior management, our board, and CFA Institute.

**Definition:**
Recognizing that we cannot improve what we do not measure, a systematic framework around measurement and tracking, where appropriate, for the other five DEI Code Principles is required. Measuring is key to success in improving DEI: What gets measured gets evaluated and managed, particularly in a data-driven industry such as investment.

**Commitment:**
We commit to the completion of the Reporting Framework and to the regular review of the returns by senior management, including updates for our board, to ensure our organization is making progress on increasing representation and driving DEI at all levels. Measuring DEI is not an exact science; not all elements of DEI are obvious or are captured well in human resources (HR) systems or Equal Employment Opportunity (EEO) categories. We also commit to collaborate with other organizations to surface and drive better measurement practices. An annual activity and impact report to CFA Institute is part of our commitment.

Guidelines and goals or targets may differ by firm. As a general tenet, however, those groups that face the greatest inequities and least inclusion should be prioritized. The guidelines provided are not exhaustive, and DEI should be thought of as a long-term business strategy. There is no finish line but rather an iterative, continuous improvement process.