



A member of the  **BARCLAYS** Group

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December 20, 2013

Robert Feldman  
Executive Secretary  
Attentions: Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> St. N.W.  
Washington, DC 20429

Dear Mr. Feldman:

On behalf of Barclays Bank PLC and its wholly owned subsidiary Barclays Bank Delaware ("together Barclays"), I am pleased to submit this letter in response to the Proposed Interagency Policy Statement for assessing the Diversity Policies and Practices of Entities Regulated by the Agencies and Request for Comment ("Proposed Policy Statement").

At the outset, Barclays would like to emphasize that Barclays is committed to diversity and inclusion and believes that commitment provides Barclays a competitive advantage. The diversity in the background of our colleagues and suppliers results in diversity of thought, opinion, capabilities and perspective that improves the quality of our products, services and processes and makes Barclays a stronger bank. Antony Jenkins, our CEO has made explicit and plentiful statements to that effect. A global diversity strategy has been established by the Executive Diversity Council which is led by members of Barclays Executive Committee. A senior member of each business areas leadership team sits on the Diversity Council and heads his/her division's own diversity council. The Global Head of Diversity and Inclusion reports on progress to the Nomination Committee of the Board of Directors periodically throughout the year.

Accordingly Barclays is broadly supportive of the Proposed Policy Statement. It is a well thought out proposal. We do have the following comments which we believe would further enhance diversity and inclusion in regulated entities.

#### Disclosing Diversity Policies and Procedures

First, while Barclays supports the Goal of Section 342 in promoting transparency and awareness of diversity policies and practices with the Agencies, and agree the public should

know that diversity standards exist, we are concerned about the proposed requirement of public disclosure of regulated entities’ detailed diversity policies and practices. Specifically Barclays does not publicize all of its procurement opportunities nor its diversity policies and procedures for a variety of reasons including business intelligence, security and competitive advantage. Barclays views many of its procurement opportunities, diversity policies and procedures as proprietary and does not want to provide full disclosure allowing its competitors to have access to them. Accordingly, we respectfully suggest that the Proposed Policy Statement be amended to allow each regulated entity to determine how best to communicate such information to the public, allowing it to disclose or to protect what it feels to be in its best interest – while of course disclosing all policies, procedures and details to the Agencies.

Standards

Barclays agrees that a set of common standards may be useful to the Agencies in making a more uniform and consistent assessment of the policies and practices.

Specifically, there should be a comparable statement referring to contracting, as is made referring to employment in the first bullet, regarding what aspects a strategic plan should cover. It’s stated that *hiring, recruiting, retention and promotion* are important. The comparable statement for contracting could be *recruiting, utilizing, growing and developing*.

The same is true of the last bullet that refers to ways in which an entity can “take proactive steps to promote a diverse pool of candidates” – should include *diverse pool of suppliers* statement as well.

Other specific recommendations as to the Standards are:

Current Language	Proposed Language	Rationale
Annual contract spending by the entity	Annual <b>spending</b> by the entity	Not all spending in a company is contracted spending
Percentage spent with MWBE contractors by race, ethnicity and gender	Percentage spent with MWBEs ( <del>contractors</del> ) by race, ethnicity and gender	This accounts for all recipients of payments – not just those with contracts
Percentage of contracts with minority-owned and women-owned business sub-contracts	Percentage of <b>spending subcontracted</b> to minority and women-owned businesses	
Demographics of the workforce for contractors and subcontractors		It should be made clear as to what is meant by demographics. Is it the demographics of the

<p>Participation in conferences, workshops and other events to attract minority and women-owned firms and informing them of contracting opportunities</p>	<p>Participation in <b>external or production of internal</b> conferences, workshops and other events to attract minority and women-owned firms and inform/vet for potential contracting opportunities</p>	<p>entire workforce of the contractors and subcontractors, or only the workforce directly producing the products and services being delivered to the regulatory entity?</p>
<p>An ongoing process to publicize its procurement opportunities</p>	<p>An ongoing process to <b>internally forecast demand and seek MWBEs for procurement opportunities</b></p>	<p>Unlike public sector procurement, private sector procurement is proprietary – constituting private contracts across a myriad of goods and services. It is not our intent to publicize all of our procurement opportunities, for a number of reasons, not the least of which is business intelligence, security and competitive advantage. As such, there should at least be evidence that where third-party procurement opportunities exist (sometimes companies will perform all of the direct client services internally) that a corresponding diversity and inclusion process exists that makes these private contracting opportunities known and available for competitive offering by qualified diverse suppliers.</p>

Other Miscellaneous Recommendations

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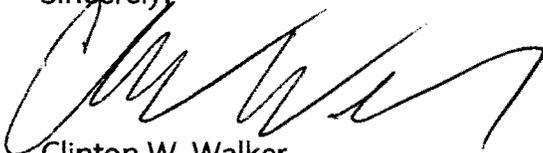
We also recommend that there should be a centralized forum for submitting diversity policies and procedures to the Agencies to allow the Agencies to share policy and practice documents in a common forum and so that regulated entities need only submit their documents once to multiple agencies.

Barclays also submits that the size of the supplier is an important diversity characteristic that should be considered by regulated entities and by the Agencies.

Finally, we suggest that the Agencies may wish to consider issuing a Diversity and Inclusion Competition of the Year Award – as a sort of carrot to promote positive diversity and inclusion practices.

In conclusion, we are happy to answer any questions you may have. You may contact Harvey Butler at 212-320-0706 or [harvey.butler@barclayscapital.com](mailto:harvey.butler@barclayscapital.com).

Sincerely,



Clinton W. Walker

cc. Harvey Butler

CWW/cm