



POLICY TITLE	Diversity and Inclusion Statement (“D&I Statement”)		
POLICY TYPE	Board Policy		
GROUP	Corporate Services	Policy Number	MW-01-02
		Approval Date	November 15 , 2023
DEPARTMENT	Office of Diversity & Inclusion (“ODI”)	Effective Date	November 15, 2023
		Last Revision	February 24, 2022
Principal Officer	Director of Diversity and Inclusion (“Director of D&I”)		
Policy Owner	Director of D&I		

1. PURPOSE OF THE POLICY

It is the policy of the Federal Home Loan Bank of New York’s (“Bank”) to 1) be committed to diversity and inclusion (“D&I”) at all levels, in management and employment, in all business practices and activities, and in all contracts and services of any kind in compliance and alignment with the Federal Housing Finance Agency’s (“FHFA”) Final Rule on minority and women inclusion at the Regulated Entities (i.e. Fannie Mae, Freddie Mac, the Federal Home Loan Banks and the Office of Finance of the FHLBanks); and 2) is intended to incorporate the requirements under guidelines approved by the Equal Employment Opportunity Commission (“EEOC”) that are consistent with Executive Order 11478.

2. POLICY SCOPE

- 2.1 The D&I Statement declares the Bank’s commitment across the entire institution.
- 2.2 This D&I Statement shall be posted in the Bank's physical facilities, including through alternative media formats, as necessary, and shall be posted on the Bank's website. Consistent with the provisions of 12 C.F.R. §1223.3(a), this D&I Statement does not and should not be construed to create any right or benefit, substantive or procedural, enforceable at law, in equity, or through administrative proceeding, by any party against the Bank, its directors, officers, employees, and agents, or any other person.

3. POLICY STATEMENT

3.1 Diversity and Inclusion

- (a) The Bank is committed to the following:
 - (i) To recruit, hire, develop, motivate, promote, retain, and compensate all applicants and employees in a nondiscriminatory manner without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, status as a parent, disability, genetic information, sexual and other reproductive health decisions, military or veteran status, or

other characteristics protected by applicable law (including Title VII of the Civil Rights Act of 1964).

- (ii) To provide equal employment opportunity for disabled employees and job applicants and, in furtherance of that commitment, taking appropriate steps to comply with the applicable provisions of the Americans with Disabilities Act of 1990.
- (iii) To ensure that all employment actions, including such matters as compensation, promotions, transfers, benefits, Bank-sponsored training/educational assistance, and social and recreational programs are administered in a nondiscriminatory manner without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, status as a parent, disability, genetic information, sexual and other reproductive health decisions, military or veteran status, or other characteristics protected by applicable law (including Title VII of the Civil Rights Act of 1964).
- (iv) To establish and administer all contractual relationships in a non-discriminatory manner without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, status as a parent, disability, genetic information, sexual and other reproductive health decisions, military or veteran status, or other characteristics protected by applicable law (including Title VII of the Civil Rights Act of 1964).
- (v) To help ensure, to the maximum extent possible in balance with financially safe and sound banking practices, that Minority, Women, and Disabled-Owned Businesses (“MWDOBs”) and Broker/Dealers are provided outreach, education, and business opportunities.
- (vi) To implement and maintain an internal dispute resolution procedure for the investigation and resolution of complaints of unfair or discriminatory treatment because of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, status as a parent, disability, genetic information, sexual and other reproductive health decisions, military or veteran status, or other characteristics protected by applicable law (including Title VII of the Civil Rights Act of 1964).
- (vii) To prohibit, and not knowingly permit, retaliation or reprisal against a person or MWDOB and Broker/Dealer, that in good faith makes a report of unlawful discrimination or any employee who participates in an investigation of alleged unlawful discrimination.

3.2 Diversity and Inclusion Principles

- (a) Diversity and Inclusion principles of the Bank include:

- (i) **Board Nominees:** The Bank engages in outreach intended to result in a pool of diverse persons eligible to be nominated by the Board and elected by the membership for positions on the Bank's Board of Directors.
- (ii) **Employee Recruitment:** The Bank engages in recruiting and outreach directed at encouraging individuals who are minorities, women, or individuals with disabilities to seek and apply for employment with the Bank.
- (iii) **Reasonable Accommodation of Disabilities:** The Bank does not discriminate on the basis of disability as defined by applicable law. The Bank attempts to reasonably accommodate the known disability of an employee or an applicant for employment where such person requests a reasonable accommodation.
- (iv) **Reasonable Accommodation for Religious Beliefs:** The Bank does not discriminate on the basis of religion. The Bank attempts to reasonably accommodate employees or an applicant to observe their sincerely held religious beliefs, given that an accommodation would not constitute an undue hardship to the Bank's business.
- (v) **Contracting and Capital Markets Outreach and Education:** The Bank engages in outreach and education designed to ensure to the maximum extent possible in balance with financially safe and sound business practices the inclusion in contracting opportunities of MWDOBs and Broker/Dealers to the Bank's day-to-day research, funding and investment needs, and seek ways to provide MWDOBs and Broker/Dealers additional information and tools to allow them to potentially grow their business through the Bank.

4. **POLICY ADMINISTRATION**

4.1 **Authority**

- (a) **Bank President and Chief Executive Officer (“President”)** has been delegated authority from the Board of Directors to implement the Bank's D&I Statement and has delegated authority for D&I to the Director of D&I.
- (b) **Director of D&I** will have the overall responsibility and authority to implement the provisions of the D&I Statement and Final Rule; and oversee the practices put in place to support both.

4.2 **Responsibility and Accountability**

- (a) **Board of Directors (“Board”)** provides oversight of the Bank's operations including diversity and inclusion & equal employment opportunity activities, and review and approval of all D&I plans, programs, and policies. The Board should

maintain awareness and understanding of the magnitude, direction, and sources of the D&I Statement and Final Rule.

(b) The Management Committee (“MC”) – is responsible for ensuring that the Bank meets its objectives within the D&I Statement, to promote diversity and ensure development, implementation, and adherence to diversity, inclusion, and non-discrimination practices. Each MC member is also responsible for ensuring that:

- Employees in his/her business group are responsible for compliance with all laws and regulations pertaining to the D&I Statement and Final Rule;
- His/her direct reports are provided with the appropriate resources to comply with the D&I Statement and Final Rule; and
- Bank Managers in his/her business group are responsible for carrying out the processes and practices required by the D&I Statement and Final Rule, and tracking and supplying information as requested by the Director of D&I

(c) Director of Diversity and Inclusion (“ODI”) – is responsible for the following:

- Contribution and facilitation to implement the D&I strategic plan, business unit goal development and recommending corrective actions across the D&I program;
- Producing reliable management reports; and
- Reporting D&I performance results.

(d) Business Units – are responsible for demonstrating a commitment to the Banks D&I Program policies and initiatives.

4.3 Applicability

(a) The provisions of this policy apply to all Bank employees.

(b) Non-compliance with this policy is subject to exception reporting in accordance with the provisions of the Bank’s Compliance Policy and Exception Procedure.

5. POLICY STANDARDS

5.1 Reporting

(a) A report will be issued by the Director of D&I on a regular basis, but no less than once per year, to the Bank’s Board of Directors and senior management concerning the Bank’s activities supporting the D&I Statement.

(b) The Bank’s Human Resources department will provide annual EEO-1 Statements to the EEOC.

- (c) In accordance with AB 2021-01, Board diversity data collection will occur on an annual basis to report to the FHFA in the Quarterly Data Reports and the D&I Annual Report.
- (d) Any changes to the automated systems that generate data for D&I reporting to the FHFA must adhere to the Bank’s Business Technology Program Change Control Procedure Referenced in SOP-720-000100.”

6. DEFINITIONS

- 6.1 Bank** means the Federal Home Loan Bank of New York.
- 6.2 ODI** means the Office of Diversity and Inclusion
- 6.3 D&I** means Diversity and Inclusion
- 6.4 EEOC** means Equal Employment Opportunity Commission
- 6.5 MWDOB** means Minority, Women, and Disabled-Owned
- 6.6 FHFA** means Federal Housing Finance Agency

7. GETTING HELP

IF YOU NEED HELP WITH	CONTACT
Questions about this policy	Director of D&I
Questions about ODI	Director of D&I
Exception Reporting	Operational Risk & Compliance Dept.
Regulatory interpretations	Legal Department

8. REFERENCES

8.1 Regulation and Regulatory Guidance

- (a) 12 CFR Part 1223 - Minority and Women Inclusion (“**Final Rule**”)
- (b) FHFA Quarterly Data Reports Guidance

8.2 Bank Policies

- (a) Diversity and Inclusion Employment Program
- (b) Diversity and Inclusion Procurement Program
- (c) Diversity and Inclusion Capital Markets Program
- (d) Diversity and Inclusion Communication Plan
- (e) Compliance Policy

8.3 Bank Standards and Guidelines

- (a) Employee Handbook

8.4 Other Governance Documents

- (a) Diversity and Inclusion Annual Report