



# The Links, Incorporated

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December 17, 2020

## Via Electronic Transmission

Vanessa A. Countryman  
Secretary  
United States Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: File No. SR-NASDAQ-2020-081

Dear Secretary Countryman:

The Links, Incorporated (“The Links”) appreciates the opportunity to provide these comments on the above-referenced proposal.

We believe that the adoption of this proposal by the Securities and Exchange Commission (“SEC”) would advance corporate board diversity as a foundational principle of the NASDAQ Stock Exchange’s (“Nasdaq”) listing and disclosure requirements. The proposed rules promise to strengthen accountability for board diversity at Nasdaq-listed companies and promote a market system that reflects greater inclusion and decision-making equity.

The Links is an organization of over 16,000 professional women of African descent who represent a broad strata of leadership expertise and experience within the business sector. While we are a non-profit organization with a specific service mission, we have a direct interest in the financial markets as stakeholders and community stewards.

Since our founding in 1946, The Links has served as a transformative presence within communities. Through our programming, we are actively engaged in fostering community empowerment, equal opportunity, and access. In addition, through The Links Foundation, Incorporated, our philanthropic arm, we actualize community investments in stakeholder organizations that are focused on social change and initiatives consistent with our priorities.

The appointment of diverse directors at Nasdaq companies is important to our organization and our members. We believe that board diversity will lead to improved corporate governance, policymaking and practices that reflect a broader commitment to inclusion, market fairness, and economic parity—all of which are important to our constituents in communities of African descent. These principles are relevant to our national conversation about the systemic reforms needed to unlock meaningful equity.

Market dynamics that inspire investor and public confidence are being shaped within the board rooms of Nasdaq-listed companies. Moreover, a significant percentage of companies from the innovation and tech sectors are represented on the Nasdaq Exchange. These companies are driving the future of job creation, competitiveness, and economic growth in our country.

It is crucial that the rooms in which decisions are being made at Nasdaq-listed companies be inclusive so that the communities we care about and work within are not disparately impacted or overlooked. Nasdaq's board diversity-focused rule changes can help to prevent that and catalyze greater diversity in our country's growth sectors.

Our position is supported by the prevailing data science which confirms the positive outcomes that are achieved by board diversity. In its May 2020 report titled, "Diversity Wins: Inclusion Matters," McKinsey Consulting shared recent board diversity performance data based on its survey of over 1,000 companies. McKinsey's findings indicated that companies in the top quartile for ethnic and racial diversity on their boards financially outperform other companies by 36 percent higher returns on profitability. Boards in the top quartile for gender diversity outperform other companies with 25 percent higher returns on profitability.

Diversity represents a material consideration for investors and shareholders in view of these outcomes. Nasdaq's proposal provides a standardized, transparent framework for reliably collecting and reporting aggregated diversity data that will be accessible to stakeholders. We also applaud the proposal's structural flexibility, uniform guidelines, and implementation time frame set forth in its phase-in period.

In sum, The Links supports the bold direction inherent in the rule changes set forth in Nasdaq's proposal. Pursuant to the SEC's mission to "protect investors; maintain fair, orderly, and efficient markets; and facilitate capital formation," the adoption of new norms advancing board diversity as a material disclosure will be critical. It is our hope that the Securities and Exchange Commission will grant this vision for the future its highest consideration.

Sincerely,

A handwritten signature in black ink, reading "Kimberly Jeffries Leonard". The signature is fluid and cursive, with the first name being the most prominent.

Kimberly Jeffries Leonard, Ph.D.  
National President

