

January 4, 2021

Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: Notice of Filing of Proposed Rule Change to Adopt Listing Rules Related to Board
Diversity (Release No. 34-90574; File No. SR-NASDAQ-2020-081)

Dear Ms. Countryman,

YWCA Metropolitan Chicago respectfully submits this letter of support for the captioned proposed listing rules filed by the Nasdaq Stock Market LLC (Nasdaq) related to board diversity disclosure.

Founded in 1876, YWCA Metropolitan Chicago is the oldest women focused organization in Chicago dedicated to eliminating racism, empowering women and promoting peace, justice, freedom and dignity for all. Integral to our mission is an inclusive marketplace where everyone has the opportunity to thrive. Diversity and inclusion in the boardroom is a significant part of that equation.

As set out in detail in Nasdaq's proposal to require proactive disclosure of board composition, there is ample research and other support proving that a diverse board – inclusive of race, gender and ethnicity – enhances corporate governance, board decision-making, investor protections and investor confidence. The Nasdaq proposal furthers these outcomes by providing companies with the opportunity to increase board diversity through a disclosure-based, business-driven approach rather than by coercion or quota. Additionally, because there is no one-size-fits-all approach to board diversity, the proposal provides reasonable flexibility to allow companies an opportunity to explain why they do not meet the minimum objectives. We strongly support this proposal that not only will allow investors (and consumers) to compare disclosures across companies and make conscious, informed decisions but also will create a more inclusive marketplace in furtherance of our mission.

Sincerely,



Dorri McWhorter
Chief Executive Officer

