



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

Re: Request for Comments on Proposed Rule Change to Adopt Listing Rules Related to Board Diversity
SR-NASDAQ-2020-081

Dear Ms. Countryman,

Working Mother Media (WMM) welcomes the opportunity to comment on Nasdaq's proposed changes related to board diversity. WMM is a strategic professional services firm that partners with leading companies to build Diversity, Equity and Inclusion (DE&I) strategies by providing the tools needed to maximize the opportunities for and business benefits of a diverse and inclusive workforce. A diverse workforce has proven to spark greater creativity and innovation. Companies that effectively foster diversity, equity and inclusion also capture a competitive advantage from changing demographics in the population and the workplace, becoming a magnet for attracting top talent.

We have 40 years' experience of surveying and measuring corporate America's progress in women's advancement, DE&I, and family-friendly workplace culture. Our surveys also track board diversity based on the percentage of board positions held by women and racial/ethnic minorities in the U.S. These findings are then included in our annual reports: [100 Best Companies for Women](#), [Top Companies for Multicultural Women](#), [Top Companies for Executive Women](#) and the [Diversity Best Practices Inclusion Index](#). Our lists and index build awareness around workplace policies, and our services provide the solutions and tools to help the implementation of programs to address issues and measure results.

To achieve meaningful change, DE&I programs will need to push for greater transparency and accountability. Without transparency, there is no accountability, and we applaud Nasdaq's efforts to help shine a spotlight on diversity practices at the highest levels of corporate America. We will continue to champion DE&I in the workplace and need more partners like Nasdaq in order to pave the way for a more equitable future. We strongly urge you to adopt SR-NASDAQ-2020-081 as policy. Thank you for the opportunity to comment on this critical issue.

Warm regards,

Subha V. Barry
President
Working Mother Media