



## **Equal Opportunity in Contracting Policy**

Federal Home Loan Bank of San Francisco  
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## Equal Opportunity Policy Statement

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The Federal Home Loan Bank of San Francisco (“the Bank”) is deeply committed to the principles of equal opportunity in employment and contracting, without regard to race, color, religion, national origin, citizenship, ancestry, sex, gender identity, sexual orientation, physical or mental disability, military service or veteran status, caregiver status, age, family care or medical leave status, marital status, domestic partner status, genetic information, or any other basis protected by applicable law.

The Bank is strongly committed to fairness and equal opportunity in employment. The Bank is welcoming, responsive, and respectful of all individuals. We realize that our employees are the Bank’s competitive advantage and that our strength and success depend on our employees. At all levels of our organization, we strive to attract and maintain a diverse workforce. The Bank welcomes those who are interested in joining an environment that optimizes the performance of every individual in pursuit of our business objective: to help meet the borrowing needs of communities served by our member banks.

To reach new and prospective employees, we actively partner with various professional associations, community organizations, and internship programs that support the communities we serve.

The Bank is also strongly committed to providing equitable opportunities to diverse businesses and communities by promoting supplier diversity engagement throughout the Bank. Our commitment directly contributes to fostering strong and vibrant communities through economic development opportunities. Our supplier database includes businesses that are owned by minorities, women, disabled persons, veterans, and members of the lesbian, gay, bisexual, and transgender (LGBT) community.

The Bank prohibits retaliation or reprisal against any individual, employee, applicant, supplier, or potential supplier for reporting or participating in an investigation of a claim of discrimination to the Bank.

The Board of Directors has designated the Human Resources Department as the Office of Minority and Women Inclusion responsible for ensuring compliance with the related requirements in the Housing and Economic Recovery Act of 2008. The Human Resources Department may be contacted by email at [hr@fhlsf.com](mailto:hr@fhlsf.com).

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## Responsibilities of the Office of Minority and Women Inclusion (OMWI)

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The Bank’s Office of Minority and Women Inclusion (“OMWI”) is responsible for ensuring the Bank’s compliance with the related requirements of the Housing and Economic Recovery Act of 2008. The Senior Vice President and Director of Human Resources is the Bank’s EEO and OMWI Officer and is responsible for the overall implementation of the Bank’s programs for equal opportunity in contracting and employment. The EEO and OMWI Officer reports to the Chief Executive Officer, has the complete and unqualified support of senior management, and is assured of the resources necessary to execute his or her responsibilities successfully. Specifically, the EEO and OMWI Officer is responsible for the following:

1. Implementing the OMWI program, including policy development and review; procedure development and maintenance; and dissemination and publication of policies and procedures. The program will be reviewed at least annually to assess its effectiveness and to make appropriate changes, if needed.
2. Keeping management informed of all important changes in the law and in equal opportunity policies regarding employment and contracting, preparing reports, as needed, to the Bank’s Chief Executive Officer and the Board of Directors concerning the status of the Bank’s program for promoting equal opportunity in contracting.
3. Investigating and resolving, in a timely fashion, all formal discrimination complaints in contracting.
4. Overseeing the training of Bank management and staff on the importance of equal opportunity and non-discrimination in contracting.
5. Partnering with the Strategic Sourcing and Vendor Management Organization (SS&VMO) to reinforce the Vendor Diversity Policy that is designed to ensure, to the maximum extent possible, the inclusion of minority, women, and disabled- owned businesses in contracting opportunities at the Bank.

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## Definitions

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Definitions of minority-, women-, and disabled-owned businesses (12 C.F.R. Section 1207.1):

A minority-owned business is a business in which (1) more than 50 percent of the ownership or control is held by one or more minority individuals; and (2) more than 50 percent of the net profit or loss accrues to one or more minority individuals.

A women-owned business is a business in which (1) more than 50 percent of the ownership or control is held by one or more women; (2) more than 50 percent of the net profit or loss accrues to one or more women; and (3) a significant percentage of senior management positions are held by women.

A disabled-owned business is a business in which (1) the business is qualified as a Service-Disabled Veteran-Owned Small Business Concern as defined in 13 C.F.R. Section 125.8-125.13; or (2) more than 50 percent of the ownership or control is held by one or more persons with a disability; and (3) more than 50 percent of the net profit or loss accrues to one or more persons with a disability.

For more information regarding the definitions provided above, see 12 C.F.R. Section 1207.1.

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## Policy Dissemination

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The Bank's efforts to publicize its commitment to equal opportunity and non-discrimination in contracting, include, but are not necessarily limited to, the following:

1. Publishing of this policy on the Bank's website, which is accessible to existing and potential diverse vendors.;
2. Providing training to procurement decision-makers concerning the Bank's Equal Opportunity in Contracting Policy and Procedures; and,
3. Notifying existing and potential vendors of the Bank's commitment to equal opportunity in contracting.

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## Outreach

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### Publication of Contracting Opportunities

The Bank will publish contracting opportunities, as appropriate, to encourage diverse vendors to submit offers or bids. Publication of contracting opportunities may include:

1. Publication of a list of the goods and services that the Bank utilizes on the Bank's public website, and with organizations such as ;

the National Minority Supplier Development Council (NMSDC) or Women's Business Enterprise National Council (WBENC), either locally, nationally, or both.

### Outreach to Diverse Vendors

The Bank works with supplier diversity sources and organizations to ensure that members of diverse groups are aware of contracting opportunities. Outreach may include:

1. Bank membership in organizations and associations that promote supplier diversity.
2. Utilizing a database of diverse vendors that is managed by the SS&VMO.
3. Participating in business expositions that include diverse vendors.

4. Educating and encouraging existing or potential vendors about the process of becoming certified or self classified as a diverse business.

## **Reporting Complaints and Concerns**

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Individuals with complaints or concerns regarding perceived discrimination in contracting opportunities may bring these issues to the attention of the EEO and OMWI Officer.

Any request for formal review of a complaint must be in writing and describe in reasonable detail, the reason for the complaint, including but not limited to the individual(s) involved, the action or treatment believed to be discriminatory, and the approximate applicable time period. The EEO and OMWI Officer, or his representative, will thoroughly investigate every reported complaint of discrimination and will provide the results of the investigation to the person lodging the complaint.

Complaints of discrimination should be directed to:  
Senior Vice President and Director of Human Resources  
FHLBank San Francisco  
P.O Box 7948  
San Francisco, CA 94120

The Federal Home Loan Bank of San Francisco prohibits retaliation against any individual who files a complaint or other concern pursuant to this policy.