

**City of Los Angeles  
Responsible Banking & Investment Monitoring Program  
For Investment Banks**

Investment banks providing City investment banking services or seeking City investment banking business must complete and submit this form no later than July 1<sup>st</sup> of each year to the City Administrative Officer to comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code.

**Contact Information:**

---

Name of Financial Institution

---

Street Address

City

State

Zip Code

---

Contact Person Name and Title

---

Telephone No.

Email Address

**SOCIAL RESPONSIBILITY**

Please answer the following questions for the preceding calendar year.

1. Did your firm make monetary donations to charitable programs within the City limits?

Yes \_\_\_ No \_\_\_

If yes, please complete the attached form, labeled at Exhibit 1.

2. Did your firm provide any scholarship awards to residents of the City of Los Angeles?

Yes \_\_\_ No \_\_\_

- a. How many scholarships were awarded? \_\_\_\_\_  
b. What was the total value of the awarded scholarships? \_\_\_\_\_

3. Does your firm have internal policies regarding utilization of subcontractors which are designated as "women owned," "minority owned," or "disabled" business enterprises? Yes \_\_\_ No \_\_\_

If yes, please provide a copy of your policies, labeled as Exhibit 2

*\*\*\*Please see Exhibit 2 for summary of Barclays Global Supplier Diversity\*\*\**

**CONSUMER PROTECTION**

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

Yes \_\_\_ No \_\_\_

If no, please briefly explain: \_\_\_\_\_

\_\_\_\_\_

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

Yes \_\_\_ No \_\_\_

If no, please briefly explain: \_\_\_\_\_

\_\_\_\_\_

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?

Yes \_\_\_ No \_\_\_

If no, please briefly explain: \_\_\_\_\_

\_\_\_\_\_

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?

Yes \_\_\_ No \_\_\_

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

\_\_\_\_\_

\_\_\_\_\_

**CERTIFICATION UNDER PENALTY OF PERJURY (\*)**

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Robert Taylor      Managing Director, Head of Municipals            01/20/21

---

Print Name      Title      Signature      Date

(\*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

**PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO [CAO.DEBT@LACITY.ORG](mailto:CAO.DEBT@LACITY.ORG).**

**Office of the City Administrative Officer  
200 North Main St. Room 1500  
Los Angeles, CA 90012  
Attention: Debt Management Group**

**Exhibit #1****Social Responsibility Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks**

<b>Name of Charitable Organization</b>	<b>Type</b>	<b>Amount (\$)</b>	<b>Year</b>
Children's Bureau of Southern California	Children & Youth Development	2,500	2012
The Harold Robinson Foundation	Children & Youth Development	1,000	2012
Mexican American Bar Foundation	Minority Empowerment	1,000	2012
City Of Hope	Cancer/Aids/Other Diseases	6,000	2012
Grand Performances	Arts & Culture	1,000	2013
Children's Bureau of Southern California	Children & Youth Development	3,000	2013
University of Southern California	Education & Literacy	6,000	2013
Cedars-Sinai Medical Center	Healthcare - General	5,000	2014
The Tyra Banks TZONE Foundation	Children & Youth Development	500	2014
Children's Bureau of Southern California	Children & Youth Development	5,000	2014
CoachArt	Arts & Culture	2,500	2014
The UCLA Foundation	Education & Literacy	5,000	2015
Children's Bureau of Southern California	Children & Youth Development	5,000	2015
Cedars-Sinai Medical Center	Healthcare - General	5,000	2015
Children's Bureau of Southern California	Children & Youth Development	5,000	2016
The Art of Elysium	Arts & Culture	2,500	2017
Cedars-Sinai Medical Center	Healthcare - General	5,000	2017
Children's Bureau of Southern California	Children & Youth Development	5,000	2017
Coro Southern California	Education & Literacy	5,000	2017
Mobility 21	Other	500	2017
Mobility 21	Other	500	2017
Children's Bureau of Southern California	Children & Youth Development	6,000	2018
Special Olympics Southern California Inc	Other	4,000	2019
Posse Foundation	Children & Youth Development	35,000	2019
Children's Bureau of Southern California	Children & Youth Development	5,000	2019
The Jewish Federation of Greater Los Angeles	Other	5,000	2019

## Exhibit #2

### Social Responsibility Question #3

#### About Barclays Global Supplier Diversity

As part of The Barclays Values - *How We Do Business*, Supplier Diversity is one way we demonstrate our commitment to a responsible and inclusive procurement process.

We believe the best and most responsible, inclusive supply chain model offering the greatest corporate and community value is one that:

- Attracts the best and most diverse entrepreneurial minds, management teams and business models wherever in the world we do business, eliminating the barriers-to-access for best-in-class B2B entrepreneurs
- Supports the growth and development of privately-held ventures by helping founders/managers gain access to capital, managerial development resources and market opportunities
- Recognises innovation as a driver of operational efficiencies, lowest total cost of ownership and incremental revenue growth through new or enhanced products
- Adapts to regional regulations, norms and customs while meeting corporate values, goals and objectives

#### *Diverse Suppliers defined*

For Barclays, a diverse supplier meets *size* (using country-specific size standards for businesses) or *ownership* (businesses majority owned and controlled by women, ethnic minorities, LGBT, veterans, persons with disabilities) diversity criteria.

#### *Our Structure*

Barclays Global Supplier Diversity initiative was launched in 2013. The Global Head of Supplier Diversity reports through the Category Management function as part of Procurement -- providing cross-functional, cross-business unit supply chain access for diverse suppliers interested in providing goods and services across the range of third-party Barclays tenders.

#### *How We're Driving Spend with Diverse Suppliers*

The Barclays Global Supplier Diversity Strategic Plan, is designed around

#### **A. Three key programmes to drive incremental spending with diverse suppliers**

1. **Supplier Market Access Programme** – designed to capture Barclays-wide procurement opportunities and match qualified diverse suppliers against them. The matchmaking is done physically, in strategic locations, and virtually -- with our strategic sourcing colleagues in the UK and US, and regional and international NGO B2B diverse supplier certifying bodies such as
  - Women's Enterprise Connect International (WeConnect Int'l) – actively engaged with its affiliate in the UK/Europe
  - Minority Supplier Development (MSDUK) - UK
  - National Minority Supplier Development Council (NMSDC) - US
  - Women's Business Enterprise National Council (WBENC) – US
  - National Gay and Lesbian Chamber of Commerce (NGLCC) - US

We're constantly adding to our proprietary database of diverse suppliers gathered from Barclays hosted or sponsored activities (see events below), including the Barclays Rise programme, to attract start-up, micro and SME businesses as potential suppliers.

We aggregate Barclays request for proposals, pre-screen diverse suppliers from these sources and match them with those responsible for leading the respective strategic sourcing process for the given products/services.

We engage diverse suppliers in traditional back- and middle-office goods and services -- areas such as technology programming, consulting, leadership and development and staffing and also include diverse suppliers in the delivery of front-office goods and services such, as broker-dealer services.

2. **Supplier Development Programme** – our primary method of developing diverse suppliers is growing our contracting relationship with them. In 2017, we achieve 7.2% with diverse suppliers. This is up from 5.6% where we began the year, adjusting for previous contributions made by Barclays Africa Group no longer in our spending data. With our recent structural changes in Procurement, we're now developing goals at a Category level across the firm, centrally managed by the Procurement team.
3. **Banking Access Programme** – as a global leader in financial services, we provide the financial utility for communities around the world to grow and thrive. As part of our Banking Access Programme, our Supplier Diversity and our banking colleagues are collaborating to develop content and provide financial services and knowledge-transfer to diverse suppliers -- allowing them to better position themselves to manage and acquire capital to fuel their growth.

#### B. Signature events that tie our three key programmes together

1. **Supplier Diversity Day events** - the culmination of these three programmes resulted in our inaugural Supplier Diversity Day in the Fall of 2014 in London. Nearly 100 diverse suppliers, mostly from the UK and some from the US, were invited to our company headquarters for in-person and video matchmakers with our strategic sourcing professionals in the UK, US and Singapore. We also delivered two sets of Master Classes under the theme "From Micro to IPO – Financial and Legal matters for the Growth Venture" designed to deliver banking and legal expertise to diverse suppliers.

We've since expanded the Supplier Diversity Day event to the US, where we continue to attract nearly 100 diverse suppliers being evaluated for potential business opportunities with Barclays as a supplier and participating in Master Classes from our business and investment bankers

2. **Second Tier Workshop** – in the Fall of 2016, we introduced our inaugural 2<sup>nd</sup> Tier Conference, widely believed that it was the first of its kind by a UK Corporate. We hosted 40 of our largest Prime Suppliers to our headquarters in London and educated them on Supplier Diversity, introduced them to our NGO supplier diversity partners as well as eligible diverse suppliers capable of subcontracting on Barclays work. The result of this event yielded a significant contribution that helped to offset loss in spend resulting from the removal of Barclays Africa Group performance.

#### C. Governance

1. **Supplier Diversity Advisory Council** – we've introduced an oversight group to help drive the supplier diversity agenda. The Council is chaired by the Chief Procurement Officer and includes all of his direct reports. Monthly review of performance, introduction of new proposals and processes and discussion on challenges and success are held with the most senior team in Procurement.

2. **Supplier Diversity Working Group** – this team, hand-picked by members of the Advisory Council, help in executing on the Supplier Diversity agenda. They meet bi-weekly with the Global Head of Supplier Diversity to drive the various initiatives supported by the Advisory Council.

By focussing on Supplier Diversity in this manner, we believe that Barclays will demonstrate responsible and inclusive procurement behaviours that differentiate us from competitors, demonstrates our Citizenship, enhances our Brand and wins favour from our shareholders, stakeholders and the diversity-conscious market as the bank that creates opportunities to rise.

**Exhibit #3**  
**Consumer Protection****1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?**

The financial institution is currently in compliance with all applicable consumer financial protection laws, including any law or regulation that prohibits illegal predatory consumer adverse practices, including those used as a basis for an employee's compensation, promotion, or discipline.

**2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?**

The financial institution considers the quantity of an employee's sales of consumer financial products and services as a basis for the employee's advancement, discipline, termination, or compensation. Barclays U.S. Consumer Bank ("BUSCB") under Barclays Bank PLC offers a base incentive and, on occasion, a promotional incentive to individuals who promote and sell consumer financial services (credit cards). These individuals work for a Co-Branded Credit Card Partner of BUSCB and are incented on either applicants taken or approved accounts. BUSCB does not have any branches. BUSCB has a suit of controls that monitor the selling/promoting of the credit card to ensure no inappropriate sales practices are being taken. These controls include but are not limited to reviewing top performers, providing post acquisition surveys, complaint monitoring, etc. Should any inappropriate behavior be identified appropriate disciplinary actions, up to and including removal from the incentive program, will be taken. BUSCB has no say in the advancement of the Co-Branded employee.

**3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?**

The financial institution has whistleblower protection policies for bank workers who reported suspected illegal banking practices to law enforcement authorities.

**4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?**

Barclays Capital Inc. ("BCI") is engaged in various legal and regulatory matters in a number of jurisdictions. BCI is subject to legal proceedings by and against BCI which arise from time to time and also subject to enquiries and examinations, requests for information, audits, investigations and legal and other proceedings by regulators, governmental and other public bodies in connection with areas of banking and business activities in which BCI is or has been engaged.

Information relating to legal and regulatory risks is set out in the Legal, Competition and Regulatory matters note to Barclays financial statements in our most recent Annual Report or Interim Results Announcement (as applicable). If a Barclays quarterly Results Announcement has been released since the most recent Annual Report or Interim Results Announcement, this may contain additional information relating to such matters. In between Results Announcements, Barclays may from time to time make Regulatory News Service announcements containing information relating to a specific legal, competition or regulatory matter. Copies of Barclays Annual Report, Results Announcements, and Regulatory News Service Announcements are available on the Barclays Investor Relations website in sections headed 'annual reports', 'results' and 'regulatory news' respectively: <https://www.home.barclays/barclays-investor-relations.html>. Additional Information relating to legal and regulatory risks is set out in the firm's Statement of Financial Condition (Unaudited) as of June 30, 2020, available at: <https://www.investmentbank.barclays.com/disclosures/barclays-capital-inc-financial-reporting.html>. Additionally, a FINRA BrokerCheck Report, detailing proceedings the Firm has been involved in, is available at: <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>.



In relation to the settlement of the DOJ's industry-wide investigations into certain sales and trading practices in the Foreign Exchange ("FX") market disclosed in our 2015 Interim Results Announcement, in common with other financial institutions announcing FX settlements on 20 May 2015 with the DOJ, Barclays PLC agreed to plead guilty to a violation of US anti-trust law.

- 5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?**

Barclays Capital Inc. ("BCI") is engaged in various legal and regulatory matters in a number of jurisdictions. BCI is subject to legal proceedings by and against BCI which arise from time to time and also subject to enquiries and examinations, requests for information, audits, investigations and legal and other proceedings by regulators, governmental and other public bodies in connection with areas of banking and business activities in which BCI is or has been engaged.

Information relating to legal and regulatory risks is set out in the Legal, Competition and Regulatory matters note to Barclays financial statements in our most recent Annual Report or Interim Results Announcement (as applicable). If a Barclays quarterly Results Announcement has been released since the most recent Annual Report or Interim Results Announcement, this may contain additional information relating to such matters. In between Results Announcements, Barclays may from time to time make Regulatory News Service announcements containing information relating to a specific legal, competition or regulatory matter. Copies of Barclays Annual Report, Results Announcements, and Regulatory News Service Announcements are available on the Barclays Investor Relations website in sections headed 'annual reports', 'results' and 'regulatory news' respectively: <https://www.home.barclays/barclays-investor-relations.html>. Additional Information relating to legal and regulatory risks is set out in the firm's Statement of Financial Condition (Unaudited) as of June 30, 2020, available at: <https://www.investmentbank.barclays.com/disclosures/barclays-capital-inc-financial-reporting.html>. Additionally, a FINRA BrokerCheck Report, detailing proceedings the Firm has been involved in, is available at: <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>.

In relation to the settlement of the DOJ's industry-wide investigations into certain sales and trading practices in the Foreign Exchange ("FX") market disclosed in our 2015 Interim Results Announcement, in common with other financial institutions announcing FX settlements on 20 May 2015 with the DOJ, Barclays PLC agreed to plead guilty to a violation of US anti-trust law.