

This whole process is based the flawed assertion that diverse representation of any group should be a requirement of boards or management of private or publicly traded corporations. There is no justification for "effective policies for increasing the number of women on boards and in senior management". The ONLY criteria for selection of a candidate for a board or senior management should be ABILITY, without respect to gender, ethnicity, language, or any other criteria. The only disclosure necessary should be why the selected candidate was the most able, without respect to other criteria. The "proposed scope and content of the model disclosure requirements" are totally inappropriate for any private or publicly traded enterprise. No "statistics, data and/or accompanying qualitative information regarding the representation of women" should be kept or reported, to the shareholders or anyone else. No extraordinary "practices should we recommend for facilitating increased representation of women on boards and in senior management" should be required.