

# Corporate Equality Index 2022

Human Rights Campaign Foundation



# Introduction



## Message from the Interim HRC Foundation President

This year marks the Human Rights Campaign Foundation's (HRCF) 20th edition of the Corporate Equality Index (CEI), the premier survey benchmarking tool on how corporations across the United States and beyond are adopting equitable workplace policies, practices and benefits for LGBTQ+ employees.

Since its launch in 2002, employees, consumers and investors have used the CEI as a comprehensive tool to determine what a company's policies are before they accept a job, buy a product or invest their money.

The inaugural edition of the CEI included 319 participants, with 13 companies achieving top scores. The 20th-anniversary edition of the CEI now includes over 1,200 participants and more than 800 top scorers. This means that employers at over 1,200 companies agreed to have their policies and benefits analyzed by the Human Rights Campaign Foundation, and that over 800 of those organizations have successfully incorporated equitable practices that ensure their employees can thrive and live life authentically.

By using the CEI criteria as a guide, businesses can help ensure that their existing policy and benefits infrastructure is inclusive of LGBTQ+ workers and their families. We are proud to share that this inclusion leads to proven increases in recruitment and retention of talented and diverse workforces in many work environments. Ultimately, the growth of the CEI reflects the truth that so many leading businesses have come to embrace: leveling the playing field for LGBTQ+ workers is not simply a societal good; it is also good for business.

We are thrilled about the progress that we have made over the last 20 years and recognize that the work must continue. Accordingly, we will be raising the bar for CEI participants in 2023 to reflect

new opportunities companies can seize to support their LGBTQ+ workers. We look forward to our continued partnership over the years to come.

Sincerely,



**JONI MADISON (SHE/HER/HERS)**

Interim President

Human Rights Campaign Foundation

## Executive Summary

**IN THIS 20TH EDITION OF THE HUMAN RIGHTS CAMPAIGN Foundation's Corporate Equality Index, a record-breaking 842 businesses met all the criteria to earn a 100 percent rating and the designation of being a 2022 "Best Place to Work for LGBTQ+ Equality."**

Top-rated CEI employers come from nearly every industry and region of the United States. To earn top ratings, employers took concrete and dedicated steps to establish and implement comprehensive policies, benefits, and practices that ensure greater equity for LGBTQ+ workers and their families. The current CEI rating criteria had four key pillars:

- **Nondiscrimination policies across business entities;**
- **Equitable benefits for LGBTQ+ workers and their families;**

**Since 2002, the Human Rights Campaign Foundation has published the CEI report based largely on the annual CEI survey administered to hundreds of major global employers. The first Index in 2002 had just 13 companies with 100 percent scores, in comparison to the 840+ companies that, as of this edition, earned a perfect score.**

Companies rated in the CEI include Fortune magazine's 500 largest publicly traded businesses (Fortune 500), American Lawyer

- **Supporting an inclusive culture; and,**
- **Corporate social responsibility.**

In recognition of the 20th anniversary of the Corporate Equality Index, and as a consequence of the ever-evolving considerations on the road to inclusion, the existing pillars will now include a new and expanded focus in five key areas. The updated areas of impact for the criteria will be as follows:

- **Driving equality in LGBTQ+ family formation;**
- **Raising the standards for transgender-inclusive healthcare by expanding the mandatory service and treatment options;**
- **Best practices for utilizing intersectional examination of workplace inequality through training and data collection;**
- **Mandatory gender transition guidelines and workplace policies to promote and ensure gender inclusivity; and,**

businesses (Fortune 500), American Lawyer magazine's top 200 revenue-grossing law firms (AmLaw 200), and hundreds of mid- to large-sized businesses that are publicly- or privately-held.

The CEI helps guide the wide-scale adoption of LGBTQ+-specific practices and language within existing business structures. For example, where businesses enumerate federally protected categories of workers in their non-discrimination policies (e.g. based on race, religion, disability, etc.), the HRC Foundation evaluates them on the inclusion of "sexual orientation" and "gender identity" protections. In terms of benefits, the HRC Foundation evaluates employers on the provision of health insurance coverage for same- and different-sex spouses and partners. In addition, the HRC Foundation assesses the availability of routine, chronic care, and transition-related medical coverage for transgender employees and dependents.

Where major businesses regularly provide education, training, and accountability measures on diversity and inclusion in the workplace, the HRC Foundation seeks to ensure that these systems include the LGBTQ+ workforce. Lastly, major businesses have a range of engagement programs for their target markets and the communities in which they operate, such as advertising, public policy engagement, supplier diversity, philanthropy, and sponsorship. We seek the inclusion of the LGBTQ+ community in these external engagement efforts.

By using the CEI criteria as a guide, businesses can help ensure that their existing policy and benefits infrastructure is inclusive of LGBTQ+

- **A comprehensive guide of available LGBTQ+ healthcare resources and services to ensure ease of accessibility to healthcare.**
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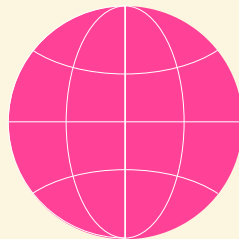
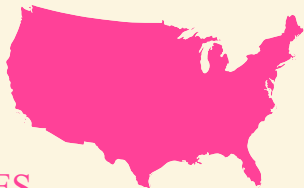
workers and their families, resulting in greater recruitment and retention of a talented, diverse workforce. The CEI serves as a roadmap to LGBTQ+ inclusive policies and practices, but it cannot provide a holistic assessment of the unique workplace cultures and individual experiences that characterize different employers. A CEI rating is one key evaluation metric, among others, in assessing the LGBTQ+ inclusiveness of any employer or provider of goods or services.

In addition to the ongoing commitment of the many prior participants, the 2022 CEI shows a significant growth in the number of newly participating businesses. This year's report contains **138** new businesses from over **20** industries that opted into the survey.

The following report is reflective of verified data submitted to the HRC Foundation as well as independent research on non-responding businesses. Wherever credit can be verified, all ranked businesses will receive it, irrespective of their participation in the CEI survey.

To date, the HRC Foundation has worked with thousands of businesses to promote workplace equality for LGBTQ+ workers.

Have  
operations  
in all **50 STATES** ,  
employing over  
**20 MILLION** workers



Employ over  
**39 MILLION**  
workers  
globally

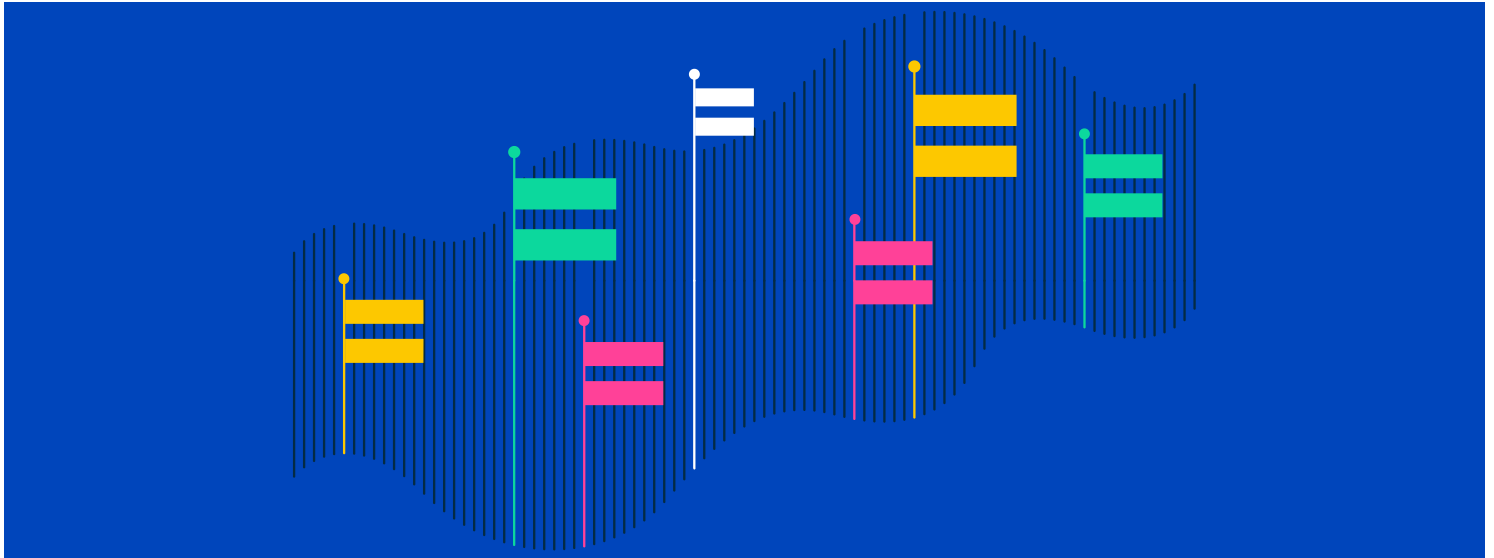


## Recognizing the Past and Looking Forward to the Future

It is the desire of the staff and management of the Human Rights Campaign Foundation to not only recognize the work of the past but also to look excitedly towards the future. The entirety of HRC's organizational framework is dedicated to creating and supporting

services, programs, and resources to further the advancement of diversity, equity, and inclusion in the LGBTQ+ community. It is our pleasure, as it has been in years past, to continue our work for years to come.

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## Highlighting 20 Years of Equality Achievements

It has been the constant mission of the Human Rights Campaign Foundation, since its creation in 1980, to advocate for inclusive and equitable policies, practices, and protections for members of the LGBTQ+ community and their families. The progress that has been made towards this goal has been significant, with considerable advancements seen in both societal attitudes regarding LGBTQ+ issues and dedicated legislation to provide employment and discrimination protections for LGBTQ+ members of the community.

Here are a few noteworthy pro-LGBTQ+ achievements:

## ○ 2015

### **Marriage Equality in the United States - Obergefell v. Hodges**

One of the most momentous societal and legal achievements for the LGBTQ+ community in the past 20 years was the 2015 Obergefell v. Hodges Supreme Court decision. This case is historical in that the decision of the Supreme Court granted same-sex couples the right to full, equal recognition under the law and made marriage equality a law in all 50 states.

## ○ 2020

### **The Bostock Decision & the CEI**

In June of 2020, the Supreme Court held in Bostock v. Clayton County that Title VII of the Civil Rights Act of 1964 protects against discrimination for LGBTQ+ employees. This ruling voided a previous precedent from the Eleventh Circuit that Title VII did not cover employment discrimination on the basis of sexual orientation by asserting that discrimination based on sexual orientation and/or gender identity is necessarily also discrimination “because of sex”, which is prohibited by Title VII. This landmark ruling is among the most impactful in history for the LGBTQ+ community.

## ○ 2020

### **House Passes the Equality Act**

The Equality Act was introduced in the House of Representatives by Rep. David Cicilline (D-RI) on February 18, 2021, and in the Senate by Sens. Jeff Merkley (D-OR), Tammy Baldwin (D-WI), and Cory Booker (D-NJ) on February 23, 2021. The Equality Act passed in the U.S. House of Representatives on February 25,



2021, with a bipartisan vote of 224-206. The first-even Senate hearing on the Equality Act was March 17, 2021. The bill awaits consideration by the full Senate.



## 20 Years of Exceptional Performance

### **A Special Acknowledgement of the CEI Participants with Two Decades of Perfect Scores**

When the Corporate Equality Index first launched in 2002, there were a total of 319 participants. The release of the first edition of the report revealed that 13 of the original 319 participants earned a score of 100% – an impressive achievement considering the unfavorable attitudes toward the LGBTQ+ community that were prevalent in the early 2000s. Because of the negativity surrounding LGBTQ+ inclusion in the early years of the report, the companies that scored 100% on the CEI in those years were, markedly, ahead of their time.

Following the first CEI report, seven companies continued to maintain a score of 100% each year, resulting in the 2022 CEI earmarking the 20th year of perfect scoring for these companies. These seven companies have shown a 20-year unwavering commitment to not only providing their LGBTQ+ employees with fair and equitable treatment but also to publicly sharing the details of their efforts in a way that welcomes and embraces accountability.

*The Human Rights Campaign Foundation understands the dedication to LGBTQ+ inclusion that is required for a company to score 100% on the CEI for the entirety of the report's 20-year history and would like to use this 20th-anniversary edition to sincerely show appreciation for the companies that have done so. Together, these seven companies represent a U.S. workforce that totals over 350,000 full-time employees.*

### Companies with 20 Years of Scoring 100%

COMPANY NAME	COMPANY HEADQUARTERS	2020 FORTUNE RANK
Apple Inc.	Cupertino, California	4
J.P. Morgan Chase & Co.	New York, New York	17
American Airlines	Fort Worth, Texas	70
Nike Inc.	Beaverton, Oregon	85
Xerox Corp	Norwalk, Connecticut	347
Eastman Kodak Co.	Rochester, New York	966
Replacements Ltd.	McLeansville, North Carolina	

# The Work Continues

## How Anti-LGBTQ+ Legislation Still Affects the Livelihood of Millions of Americans

Although there has been great progress seen in the area of LGBTQ+ issues, there is still much work left to be done. In 2021, we experienced a wave of anti-transgender state legislation: 81 bills aimed to prevent transgender youth from playing school sports consistent with their gender identity, and 43 bills to prevent transgender youth from receiving gender-affirming healthcare. Additionally, two bathroom bills were passed in Tennessee and Arkansas passed the first-ever ban preventing transgender youth from accessing gender-affirming care. By the end of the 2021 legislative session, another record 13 bills attacking transgender youth passed into law.

Although the transgender community received the brunt of discriminatory legislation, anti-LGBTQ+ bills took other forms as well, and one of the most notable trends was a resurgence of laws that carve all-new religious exemptions into existing laws that allows people to refuse to serve LGBTQ+ individuals. Across the country, 44 religious refusal bills were filed including about a dozen so-called Religious Freedom Restoration Act (RFRA) bills and a dozen more bills that would allow for religious refusals, including against LGBTQ+ patients, in medical care. South Dakota and Montana passed RFRA legislation and Ohio passed a medical care refusal bill.

While this historically bad year has been the backdrop of the 2021 legislative session, 44 new pro-equality laws were also passed. The equality bills range in topic from ensuring that utility companies allow consumers to change their names and pronouns; to streamlining adoption requirements for stepparents; to ensuring that places of public accommodation have gender-neutral bathrooms; to make it easier to update birth and

death certificates with correct names and gender markers. All ensure that LGBTQ+ people are able to take one step closer to full legal and lived equality.

Even as progress is made, as of the time of this report, only 22 states (and the District of Columbia) offer full LGBTQ+ non-discrimination protections to their residents. The remaining 28 states offer either no LGBTQ+ non-discrimination protections or in some way exclude a key group from their laws, leaving these groups without legislative protection.

While discrimination can't be prevented by legal protections alone, without federal or state legislation prohibiting it, millions of LGBTQ+ Americans and their families live in fear that the prejudice and hatred of others can, legally, destroy their livelihood. HRC, its partners, and supporters will continue to work toward the goal of all 50 states having LGBTQ+ non-discrimination protections written into law. We will also continue to advocate for passage of the Equality Act, federal legislation that would provide consistent and explicit anti-discrimination protections for LGBTQ+ people across key areas of life, including employment, housing, credit, education, public spaces and services, federally funded programs, and jury service.

The Human Rights Campaign Foundation would also like to acknowledge that 2021 was the deadliest year in history for transgender and non-binary people. Over 50 persons who identified as transgender or non-binary are known to have experienced violent deaths in 2021, with more than 50% of those victims being Black or Latinx. It has become increasingly unsafe to be transgender, especially as a person of color or other minority, and HRC is committed to working towards a future where members of the LGBTQ+ community are not violently targeted due to their sexual orientation or gender identity.

HRC's dedication, focus, and drive to make workplaces and our broader society a more diverse, inclusive, and safe environment for the LGBTQ+ community is unwavering. The 20-year anniversary of the CEI merely marks the next chapter in our fight for equality.



# Key Findings

## Key Findings

# 842

**Businesses  
Earning the  
Distinction of:**



Despite the impact of the COVID-19 global health pandemic and its corresponding economic pressures, a record-breaking **842** businesses earned 100 percent on the 2022 CEI, earning a designation as one of the “Best Places to Work for LGBTQ+ Equality.”

This year’s CEI reflects substantial growth in LGBTQ+ workplace equality and inclusion measures.

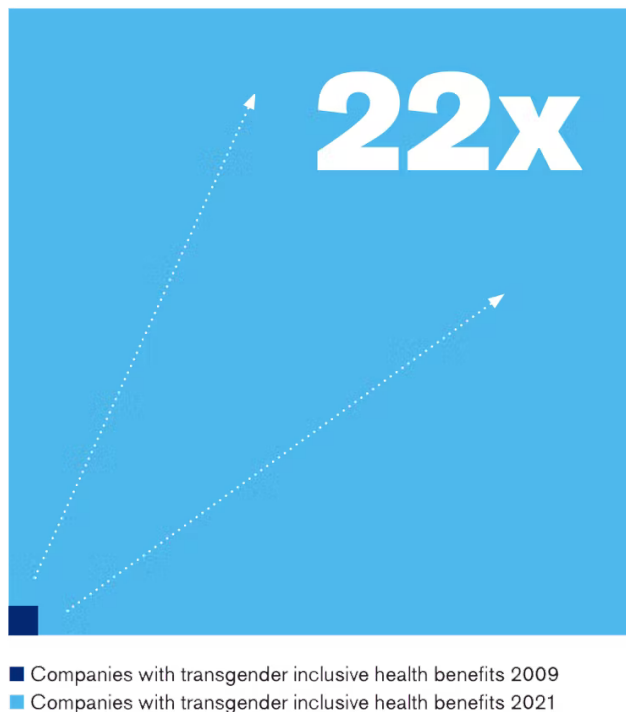
### Transgender Inclusion in the Workplace: Accelerating Progress

The most considerable progress measured over the 20-year history of the CEI, which has also been reflected in this 20th edition, is the wide-scale adoption of transgender-inclusive initiatives by participating businesses.

A full **91** percent of the Fortune 500 – including both companies

A full **91** percent of the Fortune 500 — including both companies that participate in the CEI survey and those that do not — have gender identity protections enumerated in their nondiscrimination policies (up from 3 percent in 2002). Notably, **97** percent of the entire CEI universe of businesses offer explicit gender identity non-discrimination protections (up from 5 percent in 2002).

## Driving a sea change in the adoption of nondiscrimination policies including “gender identity”



**67** percent of the Fortune 500 and **86** percent of all CEI-rated businesses (1,088 of 1,271) offer transgender-inclusive health insurance coverage, up from 0 per cent in 2002 – **22** times as many businesses as in 2009. **108** new employers offer this coverage according to the 2022 report.

**The number of CEI participating companies who offer transgender-inclusive health insurance coverage, has increased 22 times since 2009**

## 662 major businesses have adopted gender transition guidelines to establish best practices in transgender inclusion for managers and teams.

### Equality at the Fortune-Ranked Companies


**258 OF THE FORTUNE 500-RANKED BUSINESSES** achieved a **100 percent rating** (compared to **233** last year), with **15** of the **top 20** Fortune-ranked businesses at this top score. **93** percent of the Fortune 500 include “sexual orientation” in their nondiscrimination policies and **91** percent include “gender identity.” Over **66 percent** of Fortune 500 companies offer transgender-inclusive healthcare benefits.

A record **379** of Fortune 500 businesses have official CEI ratings based on submitted surveys (as compared to **366** last year), with an average rating of **76**, a rating that remains consistent with that of last year. The Fortune 1000, a list of the largest publicly-traded and privately-held companies in the United States, was invited to take part in the Corporate Equality Index survey for the twelfth year in a row.

### Businesses' Commitment to LGBTQ+ Employees

	ALL FORTUNE 500	FORTUNE 500 PARTICIPANTS
Sexual Orientation in U.S. Nondiscrimination Policy	93%	100%
Gender Identity in U.S. Nondiscrimination Policy	91%	100%
Domestic Partner Benefits	56%	74%
Transgender-Inclusive Benefits	66%	88%
<b>Average 2021 CEI Score</b>	<b>76%</b>	<b>94%</b>

	ALL FORTUNE 500	FORTUNE 500 PARTICIPANTS
Organizational LGBTQ+ Competency	72%	95%
Public Commitment to the LGBTQ+ Community	72%	95%
<b>Average 2021 CEI Score</b>	<b>76%</b>	<b>94%</b>

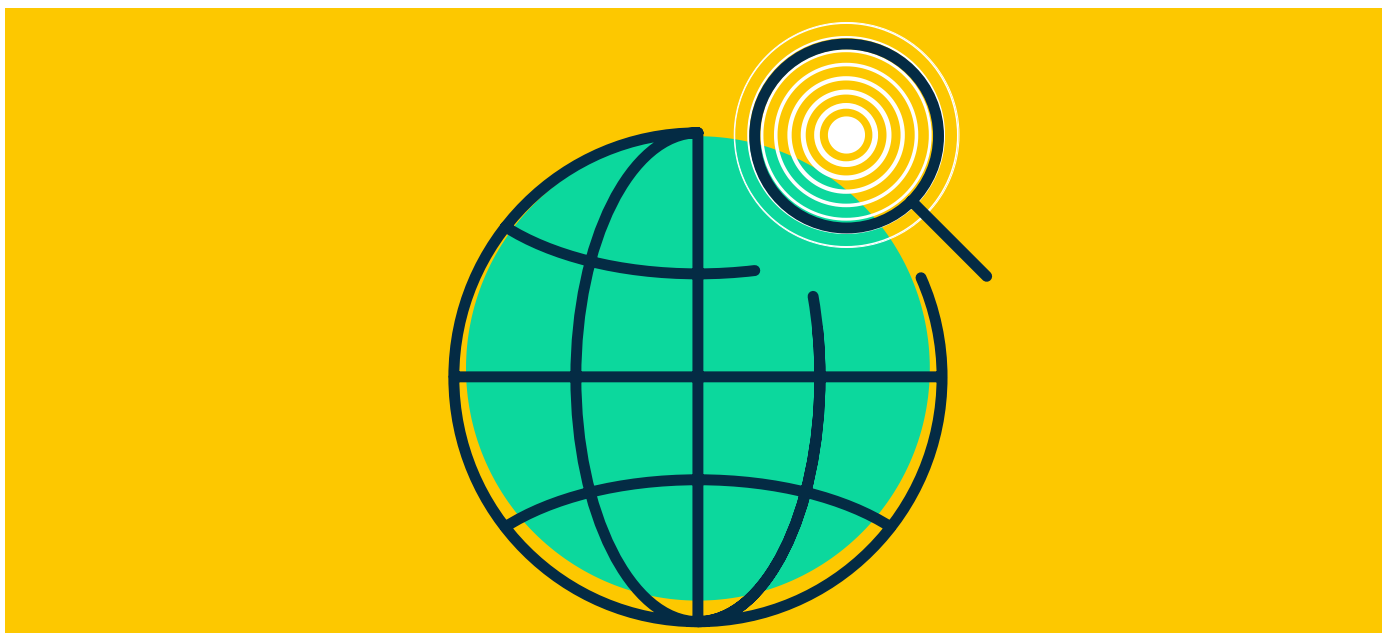


### 15 of the Top 20 Fortune-Ranked Companies Received 100% Ratings

	FORTUNE 1000	2022 CEI SCORE
Walmart Inc.	1	100
Amazon.com Inc	2	100
Exxon Mobil Corp.	3	85
Apple Inc.	4	100
CVS Health Corp.	5	100
Berkshire Hathaway	6	0
UnitedHealth Group Inc.	7	100
McKesson Corp.	8	100
AT&T Inc.	9	100
AmerisourceBergen Corp.	10	100



	FORTUNE 1000	2022 CEI SCORE
Google Inc.	11	100
Ford Motor Co.	12	90
CIGNA Corp.	13	100
Costco Wholesale Corp.	14	60
Chevron Corp.	15	100
Cardinal Health Inc.	16	100
JPMorgan Chase & Co.	17	100
General Motors Co.	18	90
Walgreen Co.	19	100
Verizon Communications Inc.	20	100



## Accelerating Global Equality

### The business case for equality knows no borders

In the 20-year history of the Corporate Equality Index, survey data has explicitly shown that having an inclusive workplace is beneficial to a company's success. The data doesn't lie - being an LGBTQ+ inclusive<sup>1</sup> employer positively impacts recruitment, retention, engagement and, overall, total revenue. Although the push for LGBTQ+ inclusive workplaces began largely as an undertaking within the United States and Europe, the conversation around inclusivity is now pointedly more prominent among international stakeholders. The bottom line is undeniable – in a global marketplace, **equality knows no borders.**

Working hand-in-hand with both U.S.-based and international businesses, HRC made the case that inclusion efforts did not have to be contained to any one border. With many multinational companies employing persons outside of the United States, HRC encouraged CEI participants to consider how their adopted inclusive policies and

practices could and would impact their workforces in countries with less tolerant legal and cultural stances towards LGBTQ+ communities.

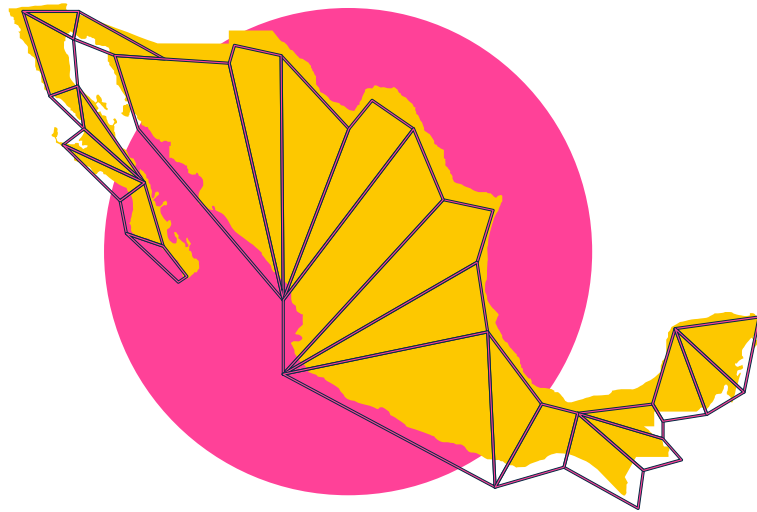
To this effort, in 2016, the Corporate Equality Index criteria were expanded to require that companies with global operations extend their nondiscrimination policies across all their operations. This change helped drive more widespread adoption of nondiscrimination policies that include sexual orientation and gender identity protections. In 2016, 54% of CEI-rated companies had global operations and 95 percent of those companies extended their LGBTQ+ inclusive nondiscrimination policies globally. With the 2022 CEI, **56** percent of rated companies have global operations and over **99** percent extend those protections globally.

The process towards LGBTQ+ inclusion does not end with nondiscrimination policies. Companies continue to amplify their global LGBTQ+ inclusion efforts through the targeted expansion of equitable benefits and inclusive practices. Globally, companies are adopting critical benefits such as domestic partner recognition and transgender-inclusive healthcare benefits. These companies are also deepening employee engagement efforts by expanding employee resource groups for LGBTQ+ workers and their allies.

In the past, and for this 2022 edition, the CEI survey collected information on global efforts to provide domestic partner benefits and transgender-inclusive benefits, support for global chapters of employee resource groups, and whether companies engage externally with LGBTQ+ communities outside the U.S. Across all categories, a majority of companies report extending these benefits and inclusive practices beyond U.S. borders.

<sup>1</sup> At the HRC Foundation, we use the acronym “LGBTQ+” to represent the diversity of the greater lesbian, gay, bisexual, transgender and queer communities. We recognize that this acronym is U.S.-centric and that communities around the world

recognize different identities and acronyms. When working in different communities, we adjust our language to reflect local customs.



## Spotlight: HRC's Equidad(e) Programs

Thanks to HRC's work with companies located within the United States, hundreds of thousands of LGBTQ+ employees and their families benefit from inclusive workplace policies, practices, and benefits. Following the unprecedented success of the CEI, many United States-based multinational companies became eager to replicate inclusive practices across their global footprint, leading to the work of the HRC Foundation expanding into the business community in the Americas.

With the CEI as a blueprint, HRC established a formal program aimed at growing LGBTQ+ inclusive practices and policies across

Next, the HRC Foundation expanded its LGBTQ+ workplace inclusion efforts to South America by partnering with Fundación Iguales, Chile's largest LGBTQ+ advocacy group, to promote LGBTQ+ inclusive policies and protections among Chilean businesses and corporations through HRC Equidad CL. Launched in 2018, the Chilean-based program assessed **31** companies in its inaugural 2019 report and 15 of them received the HRC Foundation's designation of "Mejores Lugares para Trabajar LGBT." For the report in 2021, the program grew by **52** percent, rating a total of **96** companies with **28** earning top marks, an increase from **20** top scorers in 2020 and only

workplaces in Mexico. After years of working with corporate partners, civil society organizations, and other stakeholders, including embassies and the American Chamber of Commerce, the HRC Foundation partnered with Alianza por la Diversidad e Inclusión Laboral (ADIL) to officially launch the HRC Equidad MX: Workplace Equality Program in 2016. Since its inception, the pioneering program — modeled after HRC's Corporate Equality Index — has experienced substantial growth in promoting LGBTQ+ inclusive workplaces throughout the country.

The groundbreaking success of HRC Equidad MX is reflected in the increasing number of companies participating in the survey and achieving top ratings for LGBTQ+ workplace equality. More than **242** employers earned top ratings and the HRC Foundation's designation of "Best Places to Work for LGBTQ+ Equality" or "Mejores Lugares para Trabajar LGBTQ+" in the 2022 HRC Equidad MX report. This represents a robust **14** percent increase in top-rated employers over the prior year and, given that the initial report had **32** top scorers, an almost **700** percent increase since the program's inaugural report in 2018.

**63** participating companies. The 2022 Equidad CL report will be released later this year.

Notably, HRC launched two additional Equidad(e) programs in 2021, one in Argentina and the other in Brazil. These two newest programs, Equidad AR and Equidade BR, were created in partnership with Instituto de Políticas Públicas LGBT (AR), Instituto Mais Diversidade (BR), and Forum de Empresas de Direitos LGBTI+ (BR) to recognize employers in Latin American countries that are committed to adopting critical LGBTQ+ inclusive policies and practices for their employees and assisting in the global advancement of LGBTQ+ equality.

Through the CEI, Equidad MX, Equidad CL, Equidad AR, and Equidade BR programs, the HRC Foundation has established guidelines to implement LGBTQ+ inclusive policies, best practices, and benefits across national and international corporations, impacting more than **39** million employees worldwide. Learn more at [www.hrc.im/GlobalWorkplacePrograms](http://www.hrc.im/GlobalWorkplacePrograms).

## Triple Winners



**The following 15 companies have the distinction of earning top scores on three of HRC's Corporate Equality measures: the Corporate Equality Index, Equidad MX and Equidad CL:**

- Accenture

- Adidas
  - BASF
  - Boston Consulting Group
  - Cummins
  - Deloitte
  - IBM
  - JPMorgan Chase & Co.
  - McKinsey & Co.
  - P&G
  - SAP
  - Scotiabank
  - Sodexo
  - Uber
  - Walmart
- 

## Double Certification



**In addition to the triple winners, the following 106 companies earned top marks on both the Corporate Equality Index and Equidad MX, in our 2022 editions.**

3M México & Maquilas

AbbVie México

Accenture

ADIDAS

Airbnb México

Allianz Partners México

Amazon México

American Airlines

American Express

AMGEN México

Aon

AstraZeneca

AT&T, México

Bain & Company México

Baker McKenzie

Bank of America Mexico

BASF

Bayer México

BCG

BD

BlackRock México

Brown-Forman México

Capgemini México

Cargill

Carrier México

CBRE

Cisco Systems México

Citibanamex

Coca-Cola de México

Colgate Palmolive

Corteva Agriscience

Cummins México

Cushman & Wakefield

Daimler Trucks México

Dell Technologies

Diageo México

Dow

Eaton

EY México

Facebook México

Fleishman Hillard

Ford Motor Company

General Electric México

Gilead



GlaxoSmithKline Consumer

Healthcare México

Google México

Greenberg Traurig

Herman Miller México

Hilti Mexicana

HP Inc

HSBC México

IBM

IFF México

Intel México

J.P. Morgan

Johnson & Johnson México

Kearney

Kellogg 's

KPMG

Kraft Heinz México

Lexmark International de México

Lumen

ManpowerGroup

Marriott International

Mars México

Marsh

Mastercard

McKinsey & Co. México

MetLife

Microsoft

Mondelēz International

MSD

Nestlé México

Nielsen

Nike de México

Nokia México

Novartis México

Omnicom Media Group México

Oracle de México

P&G

PageGroup

PayPal

PepsiCo Alimentos México

Pernod Ricard

Pfizer México

PwC México

Reckitt

S&P Global

Salesforce

Sanofi México

SAP México

Sempra Infraestructura – México

Sephora

Shell México

Siemens México

Sodexo México On Site Services

Steelcase México

TE Connectivity

Thomson Reuters

Uber

Under Armour México

Unilever de México

Univar Solutions

VMLY&amp;R

Walmart de México y Centroamérica

Warner Music México

**Currently, HRC and its partners are still in the process of collecting data regarding companies that have operations in Argentina and Brazil and, therefore, can participate in Equidad AR and/or Equidad(e) BR. We look forward to the inclusion of this data in the 21st edition of the Corporate Equality Index.**

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## **THE CORPORATE EQUALITY INDEX 2022 ASKED**

**PARTICIPANTS** a series of questions about LGBTQ+ inclusive policies, practices and benefits. These questions work to assess three categories of criteria, which are outlined in more detail in the Scoring Criteria section. Responses to some individual questions are reported in aggregate on the following pages to indicate national trends and facilitate benchmarking. Individual company

scores based on the CEI criteria can be found online at <https://www.hrc.org/resources/employers>.

## **Criteria 1: Workforce Protections**

- Include sexual orientation
- Include gender identity

## **Criteria 2: Inclusive Benefits**

- Spousal, medical and other benefits
- Domestic partner, medical, and other benefits
- Transgender-inclusive health insurance

## **Criteria 3: Supporting an Inclusive Culture & Corporate Social Responsibility**

- Internal education and training best practices
  - LGBTQ+ employee resource group or diversity council
  - Outreach or engagement with LGBTQ+ community
  - Corporate social responsibility
- 

## **Criteria 1: Workforce Protections**

THE WORKFORCE PROTECTIONS CRITERIA OF THE CEI CALL FOR A WRITTEN employment nondiscrimination policy that includes both “sexual orientation” and “gender identity” across all operations. For companies with operations outside of the U.S., the policy must be extended across the global workforce.

Lesbian, gay, bisexual, transgender and queer people continue to face discrimination in employment because of their sexual orientation and/or gender identity, creating a need for explicit nondiscrimination policies.

**of CEI participants (1,269 of 1,271 respondents) documented that they include “sexual orientation” in their employment nondiscrimination policy.**

**of CEI participants (1,268 of 1,271 respondents) documented that they include “gender identity” in their employment nondiscrimination policy.**

Clearly enumerated nondiscrimination protections based on sexual orientation and gender identity are essential to LGBTQ+ workforce equity and inclusion. The policies help to ensure:

- **Equal opportunity for all employees;**
- **Diverse talent acquisition and retention for broader economic growth; and,**
- **Employers are kept space with changing legal and public opinion landscapes.**

Furthermore, these policies represent minimal upfront costs. Rates of litigation, upon implementation, are consistent with other protected classes.

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## A Changing Landscape: 20 Years of Driving Adoption of Inclusive Policies

### The Bostock Decision & the CEI

On June 15, 2020, the Supreme Court of the United States issued a 6-3 decision confirming that discrimination on the basis of sexual orientation and gender identity are forms of “sex” discrimination and therefore are prohibited under the federal employment nondiscrimination law Title VII of the Civil Rights Act of 1964.

The decision was major news for the LGBTQ+ community and had implications that can eventually reach civil rights laws forbidding discrimination in education, health care, housing, and many more areas of law. It is important to note that while *Bostock* brings meaningful protections to many LGBTQ+ people, Title VII applies only to employers with 15 or more employees, leaving many LGBTQ+ workers without these critical protections.

While *Bostock* explains that discrimination on the basis of sex necessarily includes discrimination on the basis of sexual orientation and gender identity, those words are not explicitly enumerated. For this reason, the Corporate Equality Index criteria still require a company to have a nondiscrimination or equal employment opportunity policy that explicitly enumerates both “sexual orientation” and “gender identity.” Clearly stating sexual orientation and gender identity as protected characteristics

remains a best practice to ensure employees and prospective employees, as well as managers and supervisors, understand the company's commitment to nondiscrimination protections for LGBTQ+ people.

## Criteria 2: Inclusive Benefits

IN THE U.S. EMPLOYER-PROVIDED HEALTH INSURANCE IS THE SINGLE LARGEST source of healthcare coverage. Competitive employer-provided benefits packages are critical to attracting and retaining talent. Widespread employer adoption of such packages helps to ensure that offering LGBTQ+ inclusive benefits to employees and their families is a low-cost, high-return proposition for businesses. In addition, equitable benefits structures align with the principle of equal compensation for equal work. Apart from actual wages paid, benefits can account, on average, for approximately **30** percent of employees' overall compensation (BOL 2019). By amending their benefits structures, employers ensure that they extend this valuable bundle of benefits to their workforce equitably, irrespective of sexual orientation and gender identity.

Most employers have reported an overall increase of less than **3.5** percent in total benefits costs when they implement partner benefits and marginal increases related to transgender-inclusive healthcare coverage (i.e., a fraction of a decimal point of cost calculations).

The HRC Foundation rates and gives guidance on two key components of equal health insurance benefits:

- **Parity between benefits available for employees' spouses and partners; and,**
- **Affirmative transgender-inclusive healthcare benefits and removal of all broad exclusions to coverage across plan offerings.**



In addition, employers are rated on having full parity across their entire suite of benefits – including non-healthcare benefits such as leave, retirement, and others – between spouses and partners.

LGBTQ+-inclusive benefits packages are:

- **Necessary for talent acquisition and retention and broader economic growth;**
- **Equal compensation for equal work;**
- **Helping employers keep pace with changing legal landscape and workforce expectations; and,**
- **Minimal upfront costs (on average 1% increase for corporate employers' overall health insurance costs).**

The premise of parity underlies the inclusive benefits section of the CEI criteria. In its CEI scoring, the HRC Foundation does not penalize an employer if a particular benefit is not offered to any employees but holds employers accountable to provide LGBTQ+ employees and their families with the same benefits available to other employees across available benefits packages. For example, where routine care, hormone therapies, and medically necessary surgeries are available to cisgender (non-transgender) people, these same healthcare benefits must also be extended to transgender people covered by the plan. Many employers have begun to comprehensively address health insurance coverage for transgender individuals, and most have experienced insignificant or no premium increases as a result.

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## Continued Need for Partner Benefits

Since 2002, the CEI has required parity between spousal and partner benefits. After the *United States v. Windsor* and before the *Obergefell v. Hodges* Supreme Court rulings, HRC released a position paper cautioning against a marriage-only standard for accessing healthcare coverage, which is an unreasonable standard given the many other legal vulnerabilities that continue to affect LGBTQ+ individuals' freedom beyond their right to marry.

Since the 2015 U.S. Supreme Court decision in *Obergefell v. Hodges*, which brought marriage equality nationwide by ruling that marriage is a fundamental right to which same-sex couples should have the same access as opposite-sex couples, employers have sought to do the right thing in the name of equality and provide spousal benefits to both same- and different-sex married couples. Many employers assumed that the marriage ruling obviated the need for partner benefits; however, this is not true. While marriage equality is undoubtedly a monumental step toward full equality, LGBTQ+ individuals remain at risk for discrimination in many other aspects of daily life. These vulnerabilities continue to create barriers for many LGBTQ+ Americans to exercise their legal right to marry. In the absence of sexual orientation and gender identity protections through federal and consistent state law, LGBTQ+ individuals remain vulnerable to discrimination in housing, access to public places, federal funding, credit, education, jury service, and, in some cases, employment (for employees not covered under Title VII). For example, while LGBTQ+ Americans can get legally married, this lack of guaranteed protection in other domains means newly married LGBTQ+ couples are at risk for eviction from their home by a discriminatory landlord that sees their wedding photos on social media. Until LGBTQ+ Americans have full equality through the federal Equality Act, domestic partner benefits will remain an essential CEI standard that helps to fill the void left by federal and state law and ensure LGBTQ+ workers and their families receive equitable benefits whether married or partnered.

Domestic partner benefits do not only serve same-sex couples. In fact, over the last decade, most businesses that have offered same-sex partner benefits also extended

these to different-sex partners. In other words, businesses have increasingly recognized the value of decoupling benefits from the legal definition of marriage to meet the needs of their diverse workforces.

While HRC never changed its partner benefits mandate, a small number of companies moved to spousal benefits-only policies in the middle of the 2016 CEI season. Out of an abundance of understanding for participating companies, credit was given for spousal equivalent benefits in the 2016-18 CEIs. After wide-scale education and outreach efforts, the 2019 CEI resumed enforcement of the standard for both same- and different-sex domestic partner benefits. In total, 732 businesses met the standard in 2019, 836 in 2020, 892 in 2021, and 975 in 2022. The CEI continues to reflect best practices for LGBTQ+ workers and their families.

**of CEI participants (975 of 1,271 respondents)  
documented that they provide inclusive benefits  
for same- and different-sex spouses and  
partners.**

## **Understanding Transgender-Inclusive Healthcare Coverage**

In 2004, the HRC Foundation identified transgender-inclusive healthcare coverage as a focus area for educational outreach and as a scored component of the CEI criteria.

From 2006 through 2011, a top CEI score meant businesses needed to mitigate at least one exclusion among five critical categories of transgender healthcare, namely: mental health, pharmacy benefits for hormone therapy, medical visits and lab procedures related to hormone therapy, surgical procedures, and short-term leave for surgical procedures. While awareness of barriers to transgender healthcare coverage steadily increased, a majority of CEI-rated businesses plateaued in offering mental healthcare coverage

and/or short-term leave for surgical procedures and did not mitigate exclusions related to other medically necessary treatments.

In 2009, the HRC Foundation announced a major change to what would be the 2012 CEI criteria. To earn a top rating of 100 percent, a business needed not just to mitigate one or more exclusions but also to address the root problem of transgender exclusion in coverage and fully affirm healthcare coverage for medically necessary transition-related care and other routine and chronic conditions. The HRC Foundation embarked on a massive campaign of educational and consultative efforts to address healthcare and insurance disparities for the transgender population and their families, including outreach to leading health insurance companies, direct consultation with both fully- and self-insured employers to modify their health insurance plans, and collection and dissemination of cost and utilization data from leading businesses.

**of CEI-rated businesses (1,160 of 1,271 respondents) offer at least one transgender-inclusive plan option with current market standard coverage, up from 0 in 2002 and just 8% in the 2009 CEI report. This year, of the 1,160 businesses with at least one inclusive plan, 1,088 also eliminated all exclusions across plans.**

## **Growth of Trans Benefits Over Time**

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## Criteria 3: Supporting an Inclusive Culture & Corporate Social Responsibility

### Internal Education and Training Best Practices

**of CEI-rated employers (1,182 of 1,271 respondents) offer a robust set of practices (at least three efforts) to support organizational LGBTQ+ diversity competency.**

Equitable policies and benefits are critical to LGBTQ+ inclusion in the workforce but alone are not sufficient to support a truly inclusive culture within a workplace. Employers recognize that beyond the letter of a policy, additional programming and educational efforts are necessary.

Ultimately, businesses invest in organizational competency programs because:

- **Policy does not equal practice;**
- **Despite progress, 46% of LGBTQ+ workers nationwide remain closeted on the job;**
- **Invisible diversity requires unique training focus and defined safe space programs and resources;**
- **Senior-level buy-in and accountability metrics effect change quickly and for the long term; and,**
- **Retaining workers is largely about everyday experiences on the job.**

Many employers integrate educational programs into already existing diversity and inclusion programs. To obtain full credit in this criterion, employers must show at least three types of organizational competency programming. This comprehensive metric is provided as accountability for employers to devote resources to creating and maintaining a climate of inclusion.

Some of the most common forms of LGBTQ+ inclusion efforts are:

- **Diversity training programs such as new hire, manager and professional development training;**
- **LGBTQ+ metrics through self-identification programs;**
- **Performance evaluation mechanisms for senior leadership; and,**
- **Gender transition guidelines.**

**of CEI-rated employers (1,075 of 1,271 respondents) have training for New Hires that clearly states that the nondiscrimination policy**

**includes gender identity and sexual orientation, and provides definitions or scenarios illustrating the policy for each.**

**of CEI-rated employers (984 of 1,271 respondents) have Managers/Supervisors undergo training that includes gender identity and sexual orientation as discrete topics (this may be a part of a broader training), and provides definitions or scenarios illustrating the policy for each.**

**of CEI-rated employers (510 of 1,271**

**respondents) allow employees the option to self-identify as LGBTQ+ in anonymous employee engagement surveys or as part of data collection on confidential employee forms and 37% (470 of 1,271 respondents) allow self-identification in the HRIS system.**

**of CEI-rated employers (661 of 1,271 respondents) have instituted Gender Transition Guidelines with supportive restroom, dress code and documentation guidance to proactively support transitioning employees, their managers and their colleagues.**

**of CEI-rated employers (620 of 1,271 respondents) include LGBTQ+ diversity metrics as part of senior management/executive leadership performance standards.**



DOWNLOAD

## **Transgender Inclusion in the Workplace: A Toolkit for Employers**

Download PDF [!\[\]\(2b376d1a92330ab09dad2665d2f89bf5\_img.jpg\)](#)



**IN LIGHT OF POLICY AND BENEFITS** expansion, the HRC Foundation has rolled out a number of studies and resources aimed at making the policies and benefits part of an everyday workplace practice of LGBTQ+ inclusion.

In 2018, the HRC Foundation released *A Workplace Divided: Understanding the Climate for LGBTQ+ Workers Nationwide* (available at [www.hrc.org/climate](http://www.hrc.org/climate)) demonstrating that despite significant progress, 46% of LGBTQ+ workers say they are closeted at work.

The widely used *Transgender Inclusion in the Workplace: A Toolkit for Employers* (available at [www.hrc.org/transtoolkit](http://www.hrc.org/transtoolkit)) is a comprehensive resource to guide employer transgender inclusion efforts. The toolkit includes the HRC Foundation's best practice guidance on transgender inclusive policies and practices (including sample policies) as well as guidance for implementing transgender-inclusive healthcare benefits. Addressing the gap in training and education materials, the toolkit includes scenario-based learning that uses real life examples from HRC's work with businesses to illuminate the everyday experiences of transgender workers on the job.

These resources and additional materials to help employers close the gap between inclusive policy and practice can be found at [www.hrc.org/transtoolkit](http://www.hrc.org/transtoolkit).

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## **LGBTQ+ Employee Resource Group or Diversity Council**

Many large employers have formally recognized employee resource groups (also known as an employee network, business resource or affinity groups) for diverse populations of their workforce, including women, people of color, veterans, parents, people of varied abilities and LGBTQ+ & Allied people. These groups' purpose is two-fold:



- **To foster a sense of community and visibility of these diverse populations within a business; and**
- **To leverage each unique populations' networks and skills to help accomplish business goals such as market innovation, recruitment and retention of talent.**

Employee resource groups are great platforms for leadership opportunities for LGBTQ+ and allied employees to better their own work environments. In addition, the reach of many ERGs extends beyond the everyday affairs of an employer to policy making, representing the employer at professional events and external activities, participating in prospective employee recruitment efforts, mentoring, and other retention-focused programming.

Employee resource groups that are focused on the LGBTQ+ workforce empower employees as change agents and promote inclusion for LGBTQ+ employees within the workplace. Recognizing the differences in businesses rated in the CEI, this criterion can also be met with an organization-wide diversity council or working group with a mission that specifically includes LGBTQ+ diversity and inclusion.

**of CEI-rated employers (1,179 of 1,271 respondents) have an employee resource group or diversity council that includes LGBTQ+ and allied employees and programming.**

Employees who do not identify as LGBTQ+ themselves, but are invested in workplace inclusion and equality, are increasing their numbers within ERG ranks. While mission statements of ERGs are specific to LGBTQ+ inclusion, an increasing number of ally-identified colleagues are encouraged to join as membership is not limited to those who are LGBTQ+ but is open to all supporters of equality.

**of those companies with an officially recognized LGBTQ+ employee group (1,011 of 1,046) report the ERG is expressly for LGBTQ+ and Allied employees.**

ERGs have embraced allies as critical supporters of the full LGBTQ+ community, as allies bring their own unique voice and vantage point to workplace equality. The profile and impact of an employee resource group is greatly enhanced by an active executive champion for the group.

**of employee groups reported in the CEI (1,013 of 1,046) are sponsored by an executive champion.**

## **Outreach or Engagement with LGBTQ+ Community**

Despite the disruption of the COVID-19 epidemic and the cancellation of in-person events worldwide, CEI-rated businesses followed through on their commitments to LGBTQ+ community engagement throughout the year largely by leveraging online and virtual engagement platforms.

**of CEI-rated businesses (1,187 of 1,271 respondents) met the standard of demonstrating**

## **a least three efforts of public commitment to the LGBTQ+ community.**

Businesses have extensive programs to engage with key markets and the communities in which they operate. Public commitment in the CEI is measured through a number of individual engagements, namely through

- **Marketing, advertising and sponsorship efforts;**
- **LGBTQ+ specific recruiting efforts;**
- **Philanthropic contributions;**
- **LGBTQ+ supplier diversity programs; and,**
- **Public policy weigh-in.**

Additionally, the CEI includes a set of standards around foundational giving to fully align a business's actions with its core values and to raise the bar for corporate social responsibility.

Businesses see advantages in going public with their commitment to equality, including:

- **Reputational benefits to supporting equality groups and programs;**
- **Corporate case for LGBTQ+ legal equality: they are on right side of history and eliminate barriers to investment;**
- **Attracting and retaining next generation of workers and consumers – the importance of communicating pro-equality messages to millennials; and,**
- **LGBTQ+ public support is seen as a bellwether for broader issues of diversity and inclusion.**

## **Recruiting**

Professional events such as the annual Out & Equal Workplace Summit, the Lavender Law Conference, and the Reaching Out MBA (ROMBA) Conference and Career Expo are filled with highly-rated CEI employers looking to attract diverse employees. Employers' presence at these and other events sends a clear message to potential employees that LGBTQ+ diversity is part of company culture, and that LGBTQ+ candidates are valued as the best and the brightest across industries, geographies and trades. While many of these recruiting events went in virtual 2020, CEI-rated businesses remained engaged.

**of CEI-rated businesses (591 of 1,271 respondents) attended an LGBTQ+ specific recruiting event or function.**

## **Marketing & Advertising**

Ad campaigns and sponsorships further this message of company values to the public. Increasingly, ads with authentic images of LGBTQ+ people are featured in both LGBTQ+ media outlets and general press alike. Corporate philanthropic activities ranging from financial support to in-kind donations of products or services can bolster a business's profile in the LGBTQ+ community.

**of CEI-rated businesses (748 of 1,271 respondents) ran LGBTQ+ specific ads or marketing content or sponsored LGBTQ+ inclusive events such as Pride.**

## **Philanthropy**

Corporate giving to organizations promoting LGBTQ+ health, education or political efforts further demonstrates this commitment to broader LGBTQ+ equality. Typically, these efforts have a strategic connection to the core mission of a business, such as a law firm's pro bono legal support of organizations tasked with direct legal representation of LGBTQ+ individuals.

**of CEI-rated businesses (761 of 1,271 respondents) provided philanthropic support via cash or in-kind donation to at least one LGBTQ+ specific organization.**

### Supplier Diversity

Supplier diversity programs ensure that the procurement process includes specific opportunities for minority-owned businesses, including women-owned, veteran-owned and, more recently, LGBTQ+ owned businesses. Supplier diversity initiatives have existed in the business community for at least three decades, going back to the inception of such groups like the National Association of Women Business Owners and the National Minority Business Council, both founded in the early 1970s to promote the inclusion of these under-utilized entrepreneurial groups. Furthermore, there are federal initiatives such as the Center for Veterans Enterprise that is designed to assist U.S. veterans in launching and thriving in private business. These initiatives intend to give more equitable opportunities to those would be small business owners who are more likely to face social and practical barriers to success.

The National LGBT Chamber of Commerce began certifying LGBTQ+ owned small businesses in 2002, a process that requires substantiation of majority LGBTQ+ ownership in a business and verification of a business' good standing in the community.

Supplier diversity initiatives are a win-win relationship for both the LGBTQ+ owned small businesses and the businesses that contract them.

**of CEI-rated businesses with supplier diversity programs (656 of 726) specifically include LGBTQ+ owned enterprises in their programs.**

These businesses are enjoying a multitude of benefits, including a supply chain that better reflects the diverse communities in which they operate, and in turn, garnering sharper innovation and business solutions.

## **Corporate Social Responsibility**

A business's non-discrimination policies should not be limited to human resources or diversity and inclusion. The CEI's Corporate Social Responsibility criteria ensure that sexual orientation and gender identity protections apply to those standards that businesses require their vendors or suppliers to adhere to, as well as recipients of their philanthropic funds.

### **Supplier/Vendor Standards Include LGBTQ+ Nondiscrimination**

Large businesses typically rely on other businesses for goods or services, and businesses of the size included in the CEI typically have set standards and guidelines already embedded in their procurement. To ensure that suppliers act in a manner that adheres to a business's own standards, businesses must establish standards of conduct that set expectations for behavior of their suppliers.

**of rated employers in this year's CEI have supplier mandates with respect to non-discrimination in place, and 99.5% of these mandates (1,087 of 1,093 companies) explicitly include sexual orientation and gender identity alongside other named categories.**

### **Philanthropic Giving Guidelines**

The HRC Foundation has always held businesses accountable for the types of organizations receiving their philanthropic dollars. Historically, the CEI had a mechanism to account for foundational corporate giving to any organization whose explicit mission included efforts to undermine LGBTQ+ equality. This framework was widened in 2016 to hold companies accountable for any giving to a non-religious organization with an explicit policy of discrimination against LGBTQ+ people. This requirement sets the standards around responsible foundational giving and ensures that a top-rated business does not provide philanthropic support to organizations whose values do not align with theirs.

The requirement is that a top-rated business must implement internal requirements prohibiting company or law firm philanthropic giving to non-religious organizations that have a written policy of discrimination on the basis of sexual orientation and gender identity or have a policy explicitly permitting its own chapters, affiliates, etc. to discriminate.

**of CEI-rated businesses (1,021 of 1,271 respondents) have written giving guidelines that prohibit philanthropic support of non-religious organizations with an explicit policy of discrimination towards LGBTQ+ people.**

# How We've Changed Our Criteria

## Introducing New Areas of Impact & Highlighting the Way Forward

The Human Rights Campaign Foundation is excited to share the upcoming changes to the CEI and is grateful for the opportunity to raise the bar for LGBTQ+ inclusive workplaces.

This criteria adjustment reflects a 20-year history of observation, learning, and growth that the HRC is proud to continue to this day. While we believe that our previous criteria set an ideal benchmark in the past, the current and continuing issues seen within the LGBTQ+ community required us to evolve our criteria to meet the ever-changing needs of the community's members and their families.

Through these updated areas of impact expound upon our existing criteria, we also hope to elevate the public's understanding of what an LGBTQ+ inclusive workplace looks and feels like.

## Criteria Changes



### Criteria Change 1

#### Driving Equality in Family Formation

Moving forward, the CEI will contain scored criteria around family formation that ensure that same- and different-sex legal spouses and domestic partners have equal access to family formation benefits. The areas that will be assessed for equality include:

- Adoption;



- Cryopreservation (egg freezing for non-medical reasons);
- Infertility treatment coverage;
- Foster care assistance;
- Infertility treatment coverage (outside of in-vitro fertilization);
- Fertility/in-vitro fertilization coverage; and,
- Surrogacy benefits.

## Criteria Change 2

### Raising the Standards for Transgender-inclusive Healthcare

The goal of the CEI is to move the goalpost regarding equality so that members of the transgender community are not simply given access to healthcare, but can readily receive services, treatment, and care without obstacles. First, the minimal services and treatment for transgender-inclusive healthcare will now be more robust. For example, this criteria will now require hormone blockers for youth and surgical revision/repair, among other additional medical services and treatment. Companies will also be given additional points if their policies and procedures exceed the minimum requirements and offer additional benefits that would go beyond minimally-inclusive transgender healthcare.

## Criteria Change 3

### Utilizing Best Practices for Intersectional Examination of Workplace Inequality

The CEI will now require that at least one company training, provided to all employees, that addresses LGBTQ+ intersectionality within the workplace.

We will also be expanding data best practices to ensure that companies provide a confidential way for employees to self-identify at all levels of the company. These best practices will require a company to include the option to self-identify in human resource systems, the option to self-identify

in confidential surveys, or the option to provide the members of the board (leadership body) with a means of self-identification.

## Criteria Change 4

### **Maintaining Mandatory Gender Transition Guidelines to Promote and Ensure Gender Inclusivity**

From now on, companies must mandatorily offer gender transition guidelines. In addition, companies must have one overarching policy on gender inclusivity which includes dress codes, restrooms and facilities, or pronoun and chosen name usage in the workplace (email signatures/meeting/onboarding). The policies must create a more gender-inclusive atmosphere for all employees.

## Criteria Change 5

### **Providing Access to an Annual, Comprehensive Guide of Available LGBTQ+ Resources and Services**

Finally, companies must provide a guide for family formation, transgender-inclusive healthcare, and HIV services and treatment that is provided annually and upon hire to all employees. This guide must include contact information for relevant and related organizations and/or persons of interest, a full breakdown of the appeals process, a detailed FAQ, and must, ultimately, be comprehensive in its nature. The goal of this guide is to ensure that any employee who may need information on these key topics can readily access it in one, convenient location and will have the tools necessary to easily troubleshoot issues in attaining the healthcare benefits and treatment that they need.

## **New Criteria Roll-Out**

Following the release of this report, the 2023 CEI report will be open for survey submission in the Spring of 2023 and released in November of 2023 to realign with the report's original release schedule. This realignment will enable the report to be accessible

before Black Friday and ensure that the CEI can be used as a tool for consumers and the LGBTQ+ community in making purchasing decisions during the year's busiest holiday season.

*The scheduled roll-out of the new criteria will enable us to devote substantial time, energy, and resources to collaborate with companies in an effort to bring real change to the community.*

# EQUALITY=ACT

## Spotlight: Corporate Initiatives Including the Business Coalition for the Equality Act

HRC is proud to partner with leading employers on corporate initiatives that drive equality. These corporate initiatives include the [Business Statement on Anti-LGBTQ+ State Legislation](#), the LGBTQ+ [Refugees Mentorship Initiative](#), and [Working Positively](#), which invites employers to commit to being visible role models in support of HIV-positive employees and other chronic illnesses.

**One of the largest coalition initiatives is the Business Coalition for the Equality Act.**

HRC's Business Coalition for the Equality Act is a group of 503 leading U.S. employers that support the Equality Act, federal legislation that would provide the same basic protections to LGBTQ+ people that are provided to other federally protected groups.

Coalition member companies represent nearly every industry, **employ over 15.3 million people** in the U.S., command over **\$7.2 trillion** in revenue, and have **operations in all 50 states**.

The Equality Act creates clear, consistent protections to prohibit discrimination on the basis of sexual orientation and gender identity in employment ensuring that LGBTQ+ employees are hired, fired, and promoted based on their performance. In addition, the bill provides protections from discrimination in housing, credit, and jury service for LGBTQ+ people. The bill also prohibits discrimination in public spaces and services and protects against discrimination in the receipt of federal funding on the basis of sex, sexual orientation, and gender identity.

The historic *Obergefell v. Hodges* case in 2015 gave same-sex couples the right to marriage, and, since then, state legislators across the country have responded by proposing hundreds of anti-LGBTQ+ bills. However, companies opposed (and still oppose) these discriminatory bills. Over the last seven years, countless companies in all 50 states have spoken out against attempts to undermine LGBTQ+ civil rights. Discriminatory bills that attempt to curb access to public services for transgender people, deny basic services to LGBTQ+ families, or preempt local nondiscrimination ordinances put company employees, employee families, and customers at risk.

CEI-rated employers are on record supporting broad issues of LGBTQ+ equality at the local, state, and federal levels, including through amicus briefs that are submitted during court cases to support pro-LGBTQ+ legislation and rulings.

**Private sector support for the federal Equality Act surged within the last two years and, at present, 503 major employers are signatories on HRC's *The Business Coalition for the Equality Act*.**

1-800-FLOWERS.COM, Inc.

3M Co.

AbbVie Inc.

Accenture

ADP

Advanced Micro Devices Inc.

Aflac Inc.

Airbus Americas Inc.

Akamai Technologies, Inc.

Alcoa Corp.

Alliance Data Systems Corp.

Altice USA Inc.

Amalgamated Bank

American Airlines

American Express Company

American Honda Motor Co.

AMN Healthcare Services Inc.

Applied Materials Inc.

Asana, Inc.

Aspen Skiing Company LLC

AT&T Inc.

Avnet Inc.

Bain & Co. Inc./ Bridgespan Group

BASF Corp.

BBVA USA

Best Buy Co. Inc.

Box Inc.

Bright Horizons

Broadridge Financial Solutions Inc.

Brown-Forman Corp.

Burson Cohn & Wolfe

California Water Service Group

2U, Inc.

ABB Inc.

Abercrombie & Fitch Co.

Adobe Inc.

Advance Auto Parts (Advance Holding)

Aegon Asset Management

Airbnb Inc.

Air Products & Chemicals Inc.

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Ally Financial Inc.

Altria Group Inc.

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American Eagle Outfitters Inc.

American Express Global Business Travel

Ameriprise Financial Inc.

Apple Inc.

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Ascena Retail Group Inc.

Asurion LLC

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AXA Equitable Life

Bank of America Corp.

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Biogen

Bridgestone Americas Holding Inc.

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Brown Rudnick LLP

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Caesars Entertainment Corp.

Capital One Financial Corp.

Cardinal Health Inc.

Cengage Learning Inc.

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CSAA Insurance Group

CVS Health Corp.

Danone North America

Day Pitney LLP

Dell Technologies Inc.

Delta Air Lines Inc.

Diageo North America

Dow

E\*TRADE Financial Corp.

Eastern Bank Corporation

eBay Inc.

Edison International

Empower Retirement

Ernst & Young LLP

Evolent Health Inc.

Expedia Group

First Data Corp.

Food Lion, LLC

Gap Inc.

General Mills Inc.

The GIANT Company

Gilead Sciences Inc.

GlaxoSmithKline LLC

Glassdoor Inc.

Cargill Inc.

Chevron Corp.

Choice Hotels International Inc.

Citigroup Inc.

CME Group Inc.

The Coca-Cola Co.

Converse Inc.

Cox Enterprises Inc.

Cummins Inc.

Daniel J. Edelman Inc.

Darden Restaurants Inc.

Debevoise & Plimpton LLP

Deloitte LLP

The Depository Trust & Clearing Corp.

Domino's Pizza Inc.

Dropbox Inc.

E. I. du Pont de Nemours and Co. (DuPont)

Eaton Corp.

Ecolab Inc.

EMD Serono, MilliporeSigma, and EMD  
Performance Materials

Ericsson Inc.

The Estée Lauder Companies Inc.

Exelon Corp.

Facebook Inc.

Fiserv Inc.

Fossil Group Inc.

General Electric Co.

General Motors Co.

Giant of Maryland LLC

Glassdoor Inc.

GODADDY Inc.

GlaxoSmithKline LLC

GODADDY Inc.

The Guardian Life Insurance Co. of America

Halstead Real Estate

HERE North America LLC

Hess Corp.

HILTON

Hogan Lovells US LLP

Host Hotels & Resorts Inc.

HSF Affiliates LLC

Hughes Hubbard & Reed LLP

IBM Corp.

IHS Markit Ltd.

Information Resources Inc.

Insight Enterprises Inc.

InterContinental Hotels Group Americas

Iron Mountain Inc.

Jenner & Block LLP

Johnson & Johnson

JSX

Kabbage Inc.

Kearney

Keller Williams Realty Inc.

Kenneth Cole Productions Inc.

Kind LLC

KPMG LLP

Levi Strauss & Co.

Lord, Abbett & Co. LLC

Lush Fresh Handmade Cosmetics

Macy's Inc.

Marriott International Inc.

Marsh & McLennan Companies Inc.

Mastercard

Google Inc.

Guidehouse

Hannaford Supermarkets

The Hershey Co.

Hewlett Packard Enterprise Co.

Hiscox USA

Holland & Knight LLP

HP Inc.

HSN Inc.

Hyatt Hotels Corp.

IDEX Corp.

IKEA Holding US Inc.

Ingersoll-Rand Company

Intel Corp.

International Flavors & Fragrances

Jacobs Engineering Group Inc.

John Hancock Financial Services Inc.

JPMorgan Chase & Co.

Juniper Networks Inc.

Kaiser Permanente

Keep Truckin, Inc.

Kellogg Co.

KeyCorp

The Knot Worldwide

Lendlease Americas Inc.

Linden Research Inc.

Lowenstein Sandler LLP

Lyft Inc.

ManpowerGroup

Mars Inc.

Massachusetts Mutual Life Insurance Co.

McAfee LLC

## MasterCard

McCormick &amp; Company Inc.

McKinsey &amp; Co. Inc.

Medtronic PLC

Meredith Corp.

Micron Technology Inc.

MillerCoors LLC

Mondelez International Inc.

Morgan Stanley

Morningstar Inc.

NASDAQ Inc.

Nationwide

Nestlé USA Inc.

New Belgium Brewing Company

Nike Inc.

Northrop Grumman Corp.

Nuance Communications

Office Depot Inc.

Owens Corning

Pariveda Solutions Inc.

Paul Hastings LLP

Peloton Interactive Inc.

PetSmart Inc.

PG&amp;E Corp.

Pinterest Inc.

The PNC Financial Services Group Inc.

Power Home Remodeling

Principal Financial Group

Pure Storage Inc.

QUALCOMM Inc.

Realogy Holdings Corp.

Redfin Corp.

## MICRIS LLC

McKesson Corp.

McKinstry Co. LLC

Merck

MGM Resorts International

Microsoft Corp.

Mitchell Gold + Bob Williams

Moody's Corp.

Morgan, Lewis &amp; Bockius LLP

Morris, Manning &amp; Martin LLP

National Grid USA

Navient

Netflix Inc.

Nielsen

Nordstrom Inc.

NortonLifeLock

Ocean Spray Cranberries Inc.

Oracle Corp.

Palo Alto Networks

Patreon Inc.

PayPal Holdings Inc.

PepsiCo Inc.

Pfizer Inc.

Philip Morris International Inc.

Pioneer Natural Resources Company

Porter Wright Morris &amp; Arthur LLP

PricewaterhouseCoopers LLP

Procter &amp; Gamble Co.

PVH Corp.

Re/Max LLC

Red Hat Inc.

Replacements Ltd.



Rockwell Automation Inc.	Royal Bank of Canada
S&P Global Inc.	Salesforce
SAP America Inc.	Seagate Technology plc
Sheppard, Mullin, Richter & Hampton LLP	Shire PLC
Shook, Hardy & Bacon LLP	Shutterstock Inc.
Siemens Corp.	Sodexo Inc.
Sony Electronics Inc.	Southwest Airlines Co.
Spotify USA Inc.	Square Inc.
Stanley Black & Decker Inc.	Starbucks Corp.
Steelcase Inc.	SUEZ Water Technologies and Solutions
Sun Life	SurveyMonkey Inc.
Synchrony	SYSCO Corp.
Takeda Pharmaceuticals USA Inc.	Target Corp.
TD Ameritrade	TD Bank, N.A.
Tech Data Corp.	TEGNA Inc.
Tesla Inc.	Teva Pharmaceutical USA Inc.
Texas Instruments Inc.	TIAA
T-Mobile USA Inc.	TPG Global LLC
TransUnion	TripAdvisor Inc.
Truist Financial	Turner Construction Co.
Twitter Inc.	U.S. Bancorp
Uber Technologies Inc.	UKG (Ultimate Kronos Group)
Under Armour Inc.	Unilever
Union Pacific Corp.	United Airlines Holdings, Inc.
United Parcel Service Inc.	Univar Solutions Inc.
Univision Communications Inc.	Vanguard Group Inc.
Verizon Communications Inc.	ViiV Healthcare Company
Visa	Wabtec Corporation
Walt Disney Company	Warby Parker
Warner Music Inc.	WE Communications
Wellmark Inc.	Wells Fargo & Co.
Western Digital Corp.	West Monroe Partners LLC

WestRock

Williams-Sonoma Inc.

WPP Group USA

Wyndham Hotels & Resorts Inc.

Xerox Corp.

Xylem Inc.

Yext Inc.

ZenPayroll Inc. dba Gusto

Zillow Group

Zoetis Inc.

AllianceBernstein, L.P.

Amyris, Inc.

Aon PLC

Associated Banc-Corp

AvalonBay Communities Inc.

Baker & McKenzie LLP

Berkshire Bank

Black & Veatch Holding, Inc.

BlackRock

Blue Cross & Blue Shield of Rhode Island

BNP Paribas

Boies Schiller Flexner LLP

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Boston Scientific Corp.

Bridgewater Associates LP

Capri Holdings Limited

Capital Markets Company NV, The

Cargo Transporters Inc.

Carlson Inc.

Cerner Corp.

Chubb Ltd.

Clorox Co., The

Constellation Brands Inc.

Whirlpool Corp.

Workday Inc.

W.W. Grainger Inc.

Xcel Energy Inc.

Xperi Holdings Corporation

Yelp Inc.

Zendesk Inc

Ziff Davis

Zimmer Biomet Holdings Inc.

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American Electric Power Co. Inc.

Andersen Corporation

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Avery Dennison

Barclays

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Boehringer Ingelheim USA Corp.

Booz Allen Hamilton Inc.

Boston Consulting Group

BP America Inc.

Capgemini America, Inc

Capital Group Companies Inc., The

CareSource

CarGurus, Inc.

Carlyle Group LP, The

Chapman and Cutler LLP

CIGNA Corp.

Comcast NBCUniversal

Core-Mark Holding Company Inc

Constellation Brands Inc.

Core-Mark Holding Company Inc.

Corteva Agriscience

Coty Inc.

Credit Suisse USA Inc.

Crowell &amp; Moring LLP

Del Monte Foods, Inc.

Deluxe Corporation

Denny's Corp.

Deutsche Bank

Dickinson Wright PLLC

DoorDash, Inc.

Duke Energy Corp.

Dun &amp; Bradstreet Corp., The

E&amp;J Gallo Winery

Edward Jones

Eli Lilly &amp; Co.

EMD Serono, MilliporeSigma and EMD Electronics

Emerson Electric Co.

Equinix Inc.

Ericsson Inc

Eversource Energy

FactSet Research Systems Inc.

FMC Corp.

Goldman Sachs Group &amp; Co. LLC

Grant Thornton LLP

Great River Energy

Gusto, Inc.

Harley-Davidson Inc.

Henkel Corporation (North America)

Herman Miller Inc.

Herrick Feinstein LLP

Home Depot Inc., The

Honeywell International Inc.

IGT

Impossible Foods

Ingram Micro

Instacart

J. M. Smucker Co.

JetBlue Airways Corp.

Johnson Controls Inc.

Jones Lang LaSalle (JLL)

The Kraft Heinz Company

L3 Harris Technologies

Mallinckrodt LLC

Mattel Inc.

McDonald's Corporation

Metlife Inc.

Michael Page International Inc

Molson Coors Beverage Company

Moody's Corp.

New York Life Insurance Company

Norfolk Southern Corp.

Novo Nordisk Inc.

NTT Data Services, LLC

Otis Worldwide Corporation

Patagonia Inc.

Polsinelli PC

PPL Corp.

QIAGEN LLC

R1 RCM Inc.

Radian Group Inc.

REI Co-op

Relias LLC

Rockland Trust Co.	S&C Electric Company
Sanofi	Saul Ewing Arnstein & Lehr LLP
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Seyfarth Shaw LLP	Siemens Medical Solutions USA, Inc.
Signet Jewelers	Slalom
Sony Corporation of America	Sony Interactive Entertainment LLC
Sony Music Entertainment	Splunk Inc.
Standard Chartered Bank	State Street Corp.
The Stop & Shop Supermarket Company, LLC	Sunrun Inc.
Sweetgreen, Inc.	Tapestry Inc.
Thermo Fisher Scientific Inc.	Tiffany & Co.
Tillamook County Creamery Association	Toyota Motor North America Inc.
Tyson Foods Inc.	United Natural Foods, Inc.
Upwork Inc.	Vertex Pharmaceuticals Inc.
VMLY&R	VMware Inc.

# Rating System and Methodology

## Corporate Equality Index 2022

The HRC Foundation's CEI rating system is designed for mid- to large-sized businesses (500 full-time employees and above) and divided into three key categories of criteria:

- **Nondiscrimination policies across business entities;**
- **Equitable benefits for LGBTQ+ workers and their families;**
- **Supporting an inclusive culture and corporate social responsibility.**

Launched in 2002, the CEI is the first internationally recognized benchmarking report for businesses to gauge their level of LGBTQ+ workplace inclusion against competitors. In addition to seeing a growth in the number of highly-rated employers, the CEI has also seen great success in the reach of the survey. **The number of employers officially rated has expanded from 319 original participants to a current participant count of 1,271,** encompassing all major industry sectors.

## Invitations and Participation

The largest and most successful U.S. employers are invited to participate in the CEI and are identified through the following lists\*:

- **Fortune magazine's 1,000 largest publicly traded businesses (2019 Fortune 1000) and**
- **American Lawyer magazine's top 200 revenue grossing law firms (2020 AmLaw 200).**

Additionally, any private-sector, for-profit employer with 500 or more full-time U.S. employees can request to participate, including those that are privately held.

*\*Note: Due to the staggered timelines of the ranking lists and when contact lists are made available, the ranking year lags the CEI survey year by one year and the CEI publication year by up to two years.*

## How We Obtain the Information

The primary source of information for the Corporate Equality Index rating each business received is the CEI survey sent every year to previous and prospective respondents. The

web-based survey included links to sample policies and other guidance, found on the HRC Foundation website.

HRC Foundation staff provided additional assistance and direct consultation throughout the process and reviewed submitted documentation (required within each section) for appropriate language and consistency with survey answers.

Invitations for the CEI 2022 survey were emailed and mailed in May of 2021 and responses were due back in August of 2021. If a business had previously participated in the CEI, surveys were first sent to the individual(s) responsible for prior submissions. If a business had not previously participated in the CEI, surveys were sent to the chief executive officer or managing partner of the firm, as well as the highest-level executive(s) responsible for human resources, diversity, communications, or community engagement, if obtaining the contact information for these executives was possible.

The information required to generate CEI ratings for businesses is difficult to ascertain from public records alone. In addition to the self-reporting provided through the CEI survey, we investigated and cross-checked the policies and practices of the rated businesses, any connections with organizations that engage in anti-LGBTQ+ activities, and news accounts of efforts that undermine LGBTQ+ equality writ large (e.g., through case law efforts or public policy lobbying actions). Employers were not rated until all appropriate information had been gathered and verified to the greatest extent possible. Businesses were invited to provide HRC Foundation staff with any additional information or updates before this report went to print.

In total, the sources used include:

- **The HRC Foundation's CEI survey;**
- **Internal Revenue Service 990 tax filings reviewed for any business foundation's gifts to anti-LGBTQ+ groups;**

- **Case law and news accounts regarding findings of discrimination and corporate responsibility and the LGBTQ+ community at-large; and,**
- **Individuals that report information to HRC Foundation.**

If a business was found to have a connection with an anti-LGBTQ+ organization or activity, the HRC Foundation contacted the business and provided it with an opportunity to respond and, to the best of its ability, to mitigate the harm done and ensure that no such action would occur in the future. Businesses unwilling to do so would have been penalized 25 points from their overall rating through Criterion 4.

## Official and Unofficial Ratings

The HRC Foundation may have rated businesses that did not submit a survey for a 2022 rating if the business has submitted a survey in previous years and the information is determined to be accurate, or, if the HRC Foundation has obtained sufficient information to provide an individual rating. In both cases, the HRC Foundation notified the business of the official rating and gave them an opportunity to provide updates or clarification prior to the report release.

Fortune 500-ranked businesses that, after multiple invitations, have never responded to the CEI survey were evaluated independently and have designated unofficial ratings listed in gray in Appendix A. The HRC Foundation proactively evaluates these **112** Fortune-ranked companies for two key reasons:

- **To provide the public with accurate information on these key employers; and**
- **To ensure the CEI is truly a benchmarking report among peers.**

Because LGBTQ+ workers and prospective employees must navigate the gaps in federal and state protections that affect their employment decisions, our staff assesses the research on these non-surveyed businesses through this same lens, ascertaining what we can from publicly available information and applying those findings to our CEI criteria.

No matter the rating, any business that participates in the CEI is taking on a transparent, credible process of LGBTQ+ inclusion. The HRC Foundation commends the employers that have committed to the public and transparent process of the CEI survey and we invite these **112** companies to do the same.

In total, the CEI 2022 contains official ratings for **379** Fortune 500 businesses, **573** Fortune 1000 businesses, **166** law firms and **726** additional major businesses. With the additional **112** Fortune 500 businesses that have unofficial ratings, the total number of rated businesses is **1,383**. Findings in the 2022 CEI report are based on the **1,271** officially rated businesses.

## Scoring Criteria



### Criteria Workforce Protections (30 points possible)

<b>1</b>		<b>15</b>
	a. Policy includes sexual orientation for all operations	<b>points</b>
	b. Policy includes gender identity or expression for all operations	<b>15</b>
		<b>points</b>

### Criteria Inclusive Benefits (30 points possible)

<b>2</b>	
	To secure full credit for benefits criteria, each benefit must be available to all benefits-eligible U.S. employees. In areas where more than one health insurance plan is available, at least one inclusive plan must be available.



a. Equivalency in same- and different-sex spousal medical and soft benefits	<b>10 points</b>
b. Equivalency in same- and different-sex domestic partner medical and soft benefits	<b>10 points</b>
c. Equal health coverage for transgender individuals without exclusion for medically necessary care	<b>10 points</b>
<ul style="list-style-type: none"> <li>• Equal health coverage for transgender individuals without exclusions for medically necessary care           <ul style="list-style-type: none"> <li>• Insurance contract explicitly affirms coverage and contains no blanket exclusions for coverage</li> <li>• Insurance contract and/or policy documentation is based on the World Professional Association for Transgender Health (WPATH) Standards of Care</li> <li>• Plan documentation must be readily available to employees and must clearly communicate inclusive insurance options to employees and their eligible dependents.</li> <li>• Other benefits available for other medical conditions are also available to transgender individuals. Specifically, where available for employees, the following benefits should all extend to transgender individuals, including for transition-related services:               <ul style="list-style-type: none"> <li>• Short term medical leave</li> <li>• Mental health benefits</li> <li>• Pharmaceutical coverage (e.g., for hormone replacement therapies)</li> <li>• Coverage for medical visits or laboratory services</li> <li>• Coverage for reconstructive surgical procedures related to sex reassignment</li> </ul> </li> </ul> </li> </ul>	<b>10 points</b>

Criteria	<b>Supporting an Inclusive Culture &amp; Corporate Social Responsibility</b>	<b>10</b>
3	<b>(40 points possible)</b>	<b>points</b>
	<p>a. Three LGBTQ+ Internal Training and Education Best Practices</p> <p>Businesses must demonstrate a firm-wide, sustained and accountable commitment to diversity and cultural competency, including at least three of the following elements:</p> <ul style="list-style-type: none"> <li>• New hire training clearly states that the nondiscrimination policy includes gender identity and sexual orientation and provides definitions or scenarios illustrating the policy for each</li> <li>• Supervisors undergo training that includes gender identity and sexual orientation as discrete topics (maybe part of a broader training) and provides definitions or scenarios illustrating the policy for each</li> <li>• Integration of gender identity and sexual orientation in professional development, skills-based or other leadership training that includes elements of diversity and/or cultural competency</li> <li>• Gender transition guidelines with supportive restroom, dress code and documentation guidance</li> <li>• Anonymous employee engagement or climate surveys conducted on an annual or biennial basis allow employees the option to identify as LGBTQ+.</li> <li>• Data collection forms that include employee race, ethnicity, gender, military and disability status — typically recorded as part of employee records — include optional questions on sexual orientation and gender identity.</li> <li>• Senior management/executive performance measures include LGBTQ+ diversity metrics</li> </ul>	<p><b>10</b></p> <p><b>points</b></p> <p><b>15</b></p> <p><b>points</b></p>

**b. Employee group –or– Diversity council**

**c. Three Distinct Efforts of Outreach or Engagement to Broader**

**LGBTQ+ Community** | Businesses must demonstrate ongoing LGBTQ+ specific engagement that extends across the firm, including at least three of the following:

- LGBTQ+ employee recruitment efforts with demonstrated reach of LGBTQ+ applicants (required documentation may include a short summary of the event or an estimation of the number of candidates reached)
- Supplier diversity program with demonstrated effort to include certified LGBTQ+ suppliers
- Marketing or advertising to LGBTQ+ consumers (e.g.: advertising with LGBTQ+ content,
- advertising in LGBTQ+ media or sponsoring LGBTQ+ organizations and events)
- Philanthropic support of at least one LGBTQ+ organization or event (e.g.: financial, in kind or pro bono support)
- Demonstrated public support for LGBTQ+ equality under the law through local, state or federal legislation or initiatives

**5  
points**

**d. LGBTQ+ Corporate Social Responsibility**

- Contractor/supplier non-discrimination standards AND Philanthropic Giving Guidelines

Criteria  
4

**Responsible citizenship (-25)**

**-25  
points**

Employers will have 25 points deducted from their score for a large-scale official or public anti-LGBTQ+ blemish on their recent records. Scores on this criterion are based on information that has come to HRC's attention related to topics including but not limited to: undue influence by a significant shareholder calculated to undermine a business's employment policies or practices related to its LGBTQ+ employees; directing corporate charitable contributions to organizations whose primary mission includes

advocacy against LGBTQ+ equality; opposing shareholder resolutions reasonably aimed at encouraging the adoption of inclusive workplace policies; revoking inclusive LGBTQ+ policies or practices; or engaging in proven practices that are contrary to the business's written LGBTQ+ employment policies.

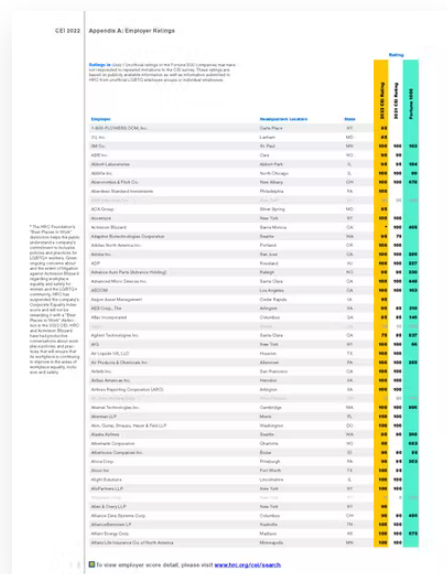
**CEI 2019 Perfect Score**

**100  
points**

## Best Places to Work for LGBTQ+ Equality 2022



**THE HUMAN RIGHTS CAMPAIGN FOUNDATION IS** proud to recognize the following **842** businesses that met all the criteria to earn a 100 percent rating and the designation of being a 2022 “Best Place to Work for LGBTQ+ Equality.” Top-rated CEI employers



## CEI 2022 Employer Ratings

[Download 2022 CEI Employer Ratings](#) ↓

**To view employer score details,  
please visit [www.hrc.org/cei/search](http://www.hrc.org/cei/search).**



# Acknowledgements

**The Human Rights Campaign Business Advisory Council was founded in 1997. Members provide expert advice and counsel to the HRC Workplace Equality Program on lesbian, gay, bisexual, transgender and queer workplace issues based on their business experience and knowledge.**

**Mostafa Abdelguelil**

(he/him)

*Council Co-Chair*

Senior Manager, Diversity & Inclusion *Capital One*

**John Barry**

(he/him)

Vice President & Relationship Manager, Global Funds Services  
*Northern Trust Corp.*

**Wyndolyn (Wendy) C. Bell, MD**

(she/her)

*UnitedHealthcare (retired)*

**Karen Morgan**

(she/her/they/them)

CFM Operations Manager

*GE*

**Carlos Orta**

(he/him/el)

Vice President and Chief DE&I Officer

*Tyson Foods*

**Michelle Phillips**

(she/her)

Partner

*Jackson Lewis PC*

**Richard Clark**

(he/him)

Chief Accounting Officer

*Accenture Ltd.***Lanaya Irvin**

(she/her/they/them)

(Business Council Co-Chair)

Chief Executive Officer

*Coqual***Linda Jolly**

(she/her)

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(he/him)

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(he/him)

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*Witeck Communications, Inc.***Alex Rhodes**

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Enterprise LGBTQ\* Strategy Lead*Bank of America*

## About the Workplace Equality Program

The Corporate Equality Index is a project of the Workplace Equality Program at the Human Rights Campaign Foundation. In addition to the CEI, the Workplace Equality Program researches, develops, and advocates for greater equity and inclusion for LGBTQ+ workers at the federal, state, and local levels, and provides support to employers

seeking to enhance LGBTQ+ inclusion through education, training, policy, and consulting assistance.

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## Meet the Workplace Equality Program Team

**Keisha Williams** (she/her) is the Human Rights Campaign Foundation's Director of the Workplace Equality Program. Prior to joining HRC, Keisha practiced law for over a decade. She served as in-house counsel at various labor unions where she represented District of Columbia and federal government employees in discrimination claims and employment disputes. She also served as Chief Negotiator in bargaining and collaborated with high-level government officials on workplace equality initiatives. Keisha still serves as an adjunct professor of law at the University of Maryland School of Law, where she teaches Labor Law. In her spare time, she is a pro bono attorney at the Whitman Walker Clinic and assists clients with legal filings for name and gender marker changes. Keisha further serves on the inaugural Board of Directors for the Ray Corollary Initiative, Inc. and serves on the Georgetown University Law Center, Workplace Streetlaw Steering Committee. Keisha attained her Juris Doctor degree from the University of Maryland School of Law. She attained a Bachelor's of Business Administration with a concentration in Finance, with honors, from Howard University. She is licensed to practice law in Maryland and the District of Columbia.

**RaShawn Hawkins, SHRM-CP** (she/her) is the Deputy Director of the Workplace Equality Program at the Human Rights Campaign Foundation. As Deputy Director, RaShawn leads the team's work to create tools for employers to deepen their LGBTQ+ inclusion efforts including training & education programs, policy guidance and employee engagement resources. Prior to joining HRC, RaShawn worked in corporate Human



Resources roles including Learning & Development. She holds a BA in Interdepartmental Studies from the University of Iowa.

**Raina Nelson** (they/them) is the Senior Manager of the Corporate Equality Index for the Human Rights Campaign Foundation and co-author of the CEI. In this role, they engage directly with employers nationwide to identify and improve LGBTQ+ inclusive policies, practices and benefits. Raina also manages all aspects of the CEI database and survey implementation. Before joining HRCF, Raina began their professional career conducting research on gender equity in education and the workplace. Raina graduated from New College of Florida with a Bachelor's degree in Political Science with a focus on the intersection of social identity and U.S. political ideology.

**Courtney Stanford** (she/her) is the Coordinator for the Workplace Equality Program at the Human Rights Campaign Foundation. In this role, she fields questions from employers and employees nationwide about the CEI process, works on CEI survey review, and provides logistical support for the entire Workplace Equality Program team. Courtney holds a BA in International Studies and a minor in Environmental Policy from the University of South Florida.

**Linda Ochoa** (she/her) is the Assistant for the Workplace Equality Program at the Human Rights Campaign Foundation. In this role, she facilitates the global workplace equality initiatives and provides logistical support for the entire Workplace Equality Program team. Linda graduated from Towson University with degrees in Business Administration and Marketing Intelligence. Before joining HRC, Linda's background was in the mortgage and healthcare industries. Linda has also volunteered for HRC and continues to volunteer with the DC Center for the LGBTQ+ community, Women's March and various organizations. She is passionate about social justice, intersectionality, Marie Kondo organization, and Passion Planning.

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