

State of Play: DEI & The Private Sector

Overview and analysis of the Trump administration's early actions on DEI and their impact on the private sector

Executive Summary

The landscape around diversity, equity and inclusion (DEI) is shifting rapidly, [fueled by a new emphasis on combatting DEI \(also referenced as DEIA in some executive orders\) at the federal level](#). DEI was a theme that was heavily featured in the first week of the new Trump administration, with the inclusion of anti-DEI rhetoric in inauguration speeches, a series of executive orders and a flurry of commentary from media and the private sector. This is in line with commentary and commitments made during President Trump's campaign and is seen as an effort to send a strong signal that DEI will be a priority area of focus for this administration. These efforts build on the foundation of an already active and largely effective anti-DEI movement driven by advocacy groups and vocal stakeholders like Robby Starbuck, that contributed to a series of corporate roll-backs and shifts in DEI policies in late 2024 and into 2025.

While the early executive orders primarily impact the federal government, there will be ripple effects on the private sector. The following briefing explores the specific executive orders we are monitoring closely, direct and indirect implications for the private sector, topline recommendations for companies and organizations trying to navigate this moment in the short term, and reactions from companies both before and after the transition in the administration.

The greatest risk for the private sector is that a strong anti-DEI stance at the federal level creates an even more complex environment for communications and advocacy. This position at the highest levels of government will hand a license to accelerate to special interests and anti-DEI advocates that have been steadily mounting effective campaigns against DEI programs and initiatives. This risk is exacerbated by the lack of a clear definition of DEI within the new federal policies or language. There are clear areas of focus, like programs or initiatives that place metric-based quotas or limit eligibility based on a protected classification (i.e. race, gender, etc.). Then there are more ambiguous areas of DEI that are not targeted by these executive orders and are largely going unaddressed in commentary, like [anti-bias training that could theoretically be directly tied to a merit-based approach](#) or workplace policies and benefits that create an inclusive or equitable environment. Notably, the executive orders carve out the continued allowance of free speech and individual advocacy on DEI issues and [have drawn swift reactions from the legal community](#).

It is also worth noting that early executive orders included [direct mentions of the philanthropic sector](#), calling out non-profits with over \$500M in assets as targets of potential investigations and including federal grantees in an executive order rolling back supplier diversity commitments.

As this environment continues to shift, we are also monitoring federal legislation and cases set to be heard by the Supreme Court, each of which could have a more far-reaching and longer-lasting impact on DEI in the private sector. For example, the [2023-2024 Dismantle DEI Act of 2024](#), introduced by JD Vance is likely to get reintroduced in this legislative session and SCOTUS is set to hear the [Ames v. Ohio Department of Youth](#) case that will decide whether an organization can be deemed as discriminating against a member of a majority-group.

DEI Executive Orders we're watching

Since January 20, there have been a series of executive orders issued that both directly and indirectly impact DEI programs, policies and positions within the federal government with one executive order directly indicating implications for the private sector. The White House distributed two fact sheets, found [here](#) and [here](#), to summarize the initial executive orders.

Below are the executive orders we are tracking that are likely to create impacts for private sector DEI programming, messaging and broader reputational issues. In addition to these executive orders, the administration has moved forward with policies like a new [State Department policy that permits only the flying of the American flag](#) on U.S. facilities at home and abroad, largely seen as an effort to ban the flying of Pride and Black Lives Matter flags.

1. [Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#)

This is the most comprehensive and far-reaching of the DEI-related executive orders. It eliminates affirmative action requirements for federal contractors and directs agencies to terminate all “diversity,” “equity,” “equitable decision-making,” “equitable deployment of financial and technical assistance,” “advancing equity,” and like mandates, requirements, programs, or activities. It seeks to prevent what it describes as discriminatory DEI practices in both public and private sectors and forbids the federal government from requiring federal contractors to comply with DEI mandates.

Further, the order mandates that all agencies include in every contract or grant award a term that requires the recipient to agree that its compliance with all Federal anti-discrimination laws is material to the government’s payment and a term requiring the recipient to certify that it does not operate any programs promoting DEI that violate any applicable Federal antidiscrimination laws.

For the private sector, this order includes the most direct effort to influence the removal of certain DEI programs and policies within companies. The order instructs the Attorney General and heads of agencies to submit a report to the Assistant to the President for Domestic Policy containing recommendations for enforcing Federal civil-rights laws and taking “other appropriate measures” to encourage the private sector to end “illegal discrimination and preferences, including DEI.” The report is required to include:

- Key sectors of concern;
- The most egregious and discriminatory DEI practitioners in each sector of concern;
- Nine potential civil compliance investigations identified by each agency, focusing on publicly traded corporations, large non-profit corporations or associations, foundations with assets of 500 million dollars or more, State and local bar and medical associations, and institutions of higher education with endowments over 1 billion dollars;
- Litigation that would be potentially appropriate for Federal lawsuits, intervention, or statements of interest; and
- Potential regulatory action and sub-regulatory guidance.

2. [Ending Radical And Wasteful Government DEI Programs And Preferencing](#)

This order calls for the termination of all DEI programs within the federal government. It directs agencies to dismantle DEI offices, place related employees on administrative leave, and cease funding for all related initiatives. The order covers all DEI, DEIA and Environmental Justice offices and positions, equity action plans, equity-related grants or contracts and all DEI or DEIA performance requirements for federal employees, contractors or grantees.

The order mandates that all agency leads provide OMB with a list of all positions, committees, programs, services, activities, budgets and expenditures related to DEI or DEIA and an assessment of whether any of these have been relabeled in an attempt to preserve their work. The report is also required to include all federal contractors who have provided DEI training or materials and all grantees who received Federal funding to provide or advance DEI, DEIA or environmental justice programs, services or activities since January 2021.

3. [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government](#)

Under the premise of protecting women, this executive order asserts that “ideologues who deny the biological reality of sex have increasingly used legal and other socially coercive means to permit men to self-identify as women and gain access to intimate single-sex spaces and activities designed for women.” It further asserts that President Trump’s administration will “defend women’s rights and protect freedom of conscience by using clear and accurate language and policies that recognize women are biologically female, and men are biologically male.”

As such, the order communicates that the federal government will adopt a policy that states “sexes are not changeable, and they are grounded in fundamental and incontrovertible reality.” The federal government will also shift from using the term “gender” to “sex,” and that sex is “an individual’s immutable biological classification.”

It’s worth noting that President Trump mentioned this executive order in his inaugural speech, which signals its level of priority.

4. [Keeping Americans Safe in Aviation](#)

This executive order sought to put a spotlight on the aviation industry and what the administration perceives to have been the dangerous impact of hiring initiatives aimed at recruiting diverse employees. Insinuating that the hiring of diverse employees, particularly persons with disabilities, threatens the safety of the industry, this executive order orders the Secretary of Transportation and FAA Administrator to immediately stop Biden-era DEI hiring programs and return to non-discriminatory, merit-based hiring. It also requires the FAA Administrator to review the past performance and performance standards of all FAA employees in critical safety positions and make clear that any individual who fails to demonstrate adequate capability is replaced by someone who will ensure Americans’ flight safety and efficiency.

5. [Reforming the Federal Hiring Process and Restoring Merit to Government Service](#)

While this order primarily addresses inefficiencies in the federal hiring process, it also asserts that “federal hiring should not be based on impermissible factors, such as one’s commitment to illegal racial discrimination under the guise of “equity,” or one’s commitment to the invented concept of “gender identity” over sex.” It further asserts that “inserting such factors into the hiring process subverts the will of the People, puts critical government functions at risk, and risks losing the best-qualified candidates.”

This order mandates the development of a Federal Hiring Plan within 120 days that brings to the Federal workforce “only highly skilled Americans dedicated to the furtherance of American ideals, values, and interests.”

Anticipated direct implications for the private sector:

While executive orders do not have sweeping direct implications for the private sector, there are elements of these orders that will quickly and directly impact the private sector. Below we have outlined the core areas where we are likely to see an impact on private employers, publicly traded companies, large non-profits and organizations engaged in equity-focused programming and advocacy.

President Trump’s directive to the Attorney General and agencies to investigate the private sector

The executive order, [Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#) contains the most direct effort to influence the ending of DEI initiatives within the private sector. The order instructs the Attorney General and heads of agencies to submit a report to the Assistant to the President for Domestic Policy containing recommendations for enforcing Federal civil-rights laws and taking “other appropriate measures” to encourage the private sector to end “illegal discrimination and preferences, including DEI.”

The order calls for each agency to identify sectors of concern and put forward nine potential civil compliance investigations, focusing on publicly traded corporations, large non-profit corporations or associations, foundations

with assets of 500 million dollars or more, State and local bar and medical associations, and institutions of higher education with endowments over 1 billion dollars.

The report is required to include the “most egregious and discriminatory DEI practitioners” in each sector of concern and provide recommendations on litigation, regulatory action and sub-regulatory guidance that would be appropriate for each case.

President Trump’s directive on new contractual terms for federal contractors and grantees

The executive order, [Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#), eliminates affirmative action requirements for federal contractors and directs agencies to terminate all “diversity,” “equity,” “equitable decision-making,” “equitable deployment of financial and technical assistance,” “advancing equity,” and like mandates, requirements, programs, or activities.

Most plainly, it prevents the federal government from requiring that federal contractors comply with DEI mandates as a condition for their eligibility. It goes a step further to mandate that all agencies include in every contract or grant award a term that requires the recipient to agree that its compliance with all federal anti-discrimination laws is material to the government’s payment and a term requiring the recipient to certify that it does not operate any programs promoting DEI that violate any applicable federal antidiscrimination laws.

While this is likely to be the subject of litigation, as written it would have a significant impact on the DEI programs and policies of any company or organization that receives a federal contract or grant.

Increase in litigation

In the wake of the SCOTUS ruling on affirmative action in college admissions, we saw an increase in lawsuits against private organizations citing the ruling as grounds for discrimination cases for programs that consider identity-based attributes for eligibility. We expect to see this same pattern following the executive orders, leveraging the new federal policies as grounds to bring lawsuits against private organizations for programs or initiatives that fall within what the Federal Government now deems to be “illegal DEI” activities.

We expect to see the most litigation in areas related to gender and gender identity, supplier diversity, apprenticeships and internships, grantmaking and scholarships, with more direct litigation against companies that hold federal contracts that are now bound by the new contractual terms outlined in the executive order, [Ending Illegal Discrimination and Restoring Merit-Based Opportunity](#).

We also expect to see an increase in government-backed litigation against the private sector. The executive orders imply that corporations with DEI programs may face scrutiny to determine if their initiatives violate civil rights laws by engaging in discriminatory practices. The Department of Justice has been tasked with developing a strategic enforcement plan to address what the administration considers “illegal” DEI programs and principles.

Continued shareholder activism

There has been increased activity over the past year from conservative think tanks and advocacy organizations that are submitting and advocating for shareholder proposals that challenge inclusive business practices.

Several publicly traded corporations, such as Apple, Costco, JPMorgan, and more, have received proposals to scale back or quantify the risk of their DEI initiatives from think tanks such as The National Center for Public Policy Research (NCPPI), National Legal and Policy Center (NLPC), who own small stakes in shares of the companies they are targeting. All of these companies have publicly rejected the shareholder proposals, with Costco’s shareholders [voting to reject](#) the proposal in a 98% to 2% vote. [Costco’s rejection of the shareholder proposal offers the most direct private sector repudiation of the anti-DEI movement](#) (pg. 32-33).

The National Center for Public Policy Research (NCPPI) is one of the more active organizations in this space, with minor shares in several publicly traded companies. They have submitted proposals to end DEI programs and were also the co-plaintiffs in a legal case striking down the [Nasdaq Board Diversity Rules](#). The [WSJ](#) has reported Goldman and JPMorgan received the anti-DEI proposals from NCPPI and NLPC, and Citigroup and Bank of America received

proposals from NLPC and the Heritage Foundation, respectively, asking the banks to audit whether they have surveilled customers on the basis of their political or religious beliefs. As background, Republicans in Congress criticized banks including Bank of America and Citi for cooperating with the Federal Bureau of Investigation after the Jan. 6, 2021, attacks on the Capitol to identify possible “domestic violent extremists” on the basis of what critics say is protected religious or political expression.

Rapidly shifting state and local policy environment

We anticipate that the federal government policies will have a ripple effect at the state and local level, with conservative-leaning elected officials introducing legislation mirroring the new policies set by President Trump’s executive orders. These will further build on [passed or moving legislation introduced in state legislatures in 2024](#). Attorneys General will be at the forefront of these efforts. We are currently aware that Robby Starbuck is meeting directly with conservative Attorneys general to help identify companies that could be targets of increased state-level scrutiny and anti-DEI advocacy.

Additionally, we anticipate corporate DEI initiatives becoming a sticking point or challenge for protecting and building relationships with state, local and federal elected officials and agencies. Clear communication on DEI policies, initiatives and perspectives should be considered as part of your 2025 and beyond government and public affairs planning efforts.

Anticipated indirect implications for the private sector:

Increased legitimization of anti-DEI advocacy groups and activists

We are seeing an extreme pendulum swing on DEI over this past year, that will be amplified and accelerated by this new administration. The administration has signaled that combatting DEI and “woke ideologies” is a strategic priority and given the issue top billing during inaugural speeches and the level of inclusion in early waves of executive orders. This will continue to create an environment that further legitimizes the anti-DEI movement and integrates the perspective into the highest levels of leadership. For example, President Trump appointed Andrea Lucas to be the acting chair of the Equal Employment Opportunity Commission, who [immediately pledged](#) to crack down on “DEI-related discrimination.” Other key appointees are supporters of the anti-DEI movement, including Robert F. Kennedy, Matt Gaetz, Stephen Miller (Founder of America First Legal), Elise Stefanik, Marco Rubio, Pete Hegseth (confirmed), and Kristi Noem.

Expect to see an increased visibility and volume of activity from groups like The National Center for Public Policy Research (NCPFR), National Legal and Policy Center (NLPC), America First Legal, American Alliance for Equal Rights, Robby Starbuck and other conservative think tanks, advocacy organizations and leading advocate voices.

At the same time, we’re likely to see a lessening of the social/cultural relevance of players like Robby Starbuck who will not be as effective taking credit for wins in an environment where the public perception is that these changes are being spurred by the Trump Administration’s policies and priorities.

Internal and external calls on companies to affirm their values

As many companies are already experiencing, there will be an increase in calls from both internal and external voices to reaffirm or clarify their values and stances on issues that will be put in the spotlight by Trump administration policies and initiatives. Companies will need to remain values-first, audience-centric and determine if and how to engage around societal issues internally and externally.

While many companies over the past 4-5 years have developed and leveraged decision-making frameworks, these will need to be refreshed and modified in this new environment and factoring in both the changes in the policy/legal landscape and the shifting perspectives of their stakeholder groups.

It will be critical for companies to have a deep understanding of their employee, customer and stakeholder bases and ensure they are making informed decisions that they can stand on when the pendulum eventually swings in a different direction.

Impacts on messaging, communications and engagement

Given the media landscape and widespread discussion of DEI issues on social media, a significant increase than the more siloed conversations that were taking place in 2024, there is an opportunity for companies to lean into the external environment and be clear about what changes are being made and why. It will be just as important to communicate what won't change about your commitments or values.

For companies that have been vocal advocates for DEI and who have publicly advocated for or against policies that impact diverse communities, there is an increased risk when considering whether to proactively distance themselves from these efforts or remain silent when issues arise. This will extend beyond the societal conversations around DEI and include decision making on whether to address broader issues that are relevant to your diverse stakeholders (i.e. immigration, health and healthcare policies, etc.)

Topline recommendations for the private sector:

Building on the legal risk audits that most companies and organizations have already undertaken to understand and ensure their DEI programs follow the letter of the law, below are topline recommendations to consider:

1. **Define your risk appetite** | We are in a new landscape for DEI programs, initiatives and communications. Despite the reality that these programs continue to be legal, there is an increase in litigation, social commentary and anti-DEI advocacy at the highest levels of government that increases the environment of risk for companies and organizations. It is important to run your organization through risk-based scenario planning to ensure alignment and define clear parameters for risk.
2. **Know where your stakeholders stand** | Remaining stakeholder-centric will help companies weather reputational impacts of DEI communications – whether doubling down or shifting. Broadly speaking, recent data continues to show that the majority of employees and consumers support DEI initiatives and perceive it as being important to the business. New research from [Morning Consult](#), 67% of U.S. adults believe it is either very or somewhat important for companies to speak out on diversity and inclusion in the workforce and while this number varies across demographics, even a slim majority of Republicans are typically in favor of brands promoting DEI. The research adds that audiences are also increasingly understanding DEI as an operational imperative with 67% of employed U.S. adults saying that DEI initiatives are either very or somewhat important to the success of most businesses. The same research found that following the election, support for organizations walking back from DEI efforts declined by more than 4 percentage points. *Both e.l.f. Cosmetics and Tractor Supply Co are strong examples of understanding where your stakeholders stand and leveraging this insight to drive decision-making. Tractor Supply Co. Factored in their majority rural and conservative customer base in their decision to roll back DEI, while e.l.f. Cosmetics factored in their 70% Millennial/Gen-Z and 40% diverse workforce and majority young/diverse customer base in their decision to double down.*
3. **Connect DEI to the business** | One of the leading arguments of anti-DEI advocates is that DEI represents a risk to business performance. Messaging focused on maintaining DEI programs and commitments should connect these efforts to the impact that diversity has on the way your organization performs, meets customer demands or otherwise achieves success. This becomes increasingly important when responding to or navigating shareholder resolutions. *Costco's messaging on a diverse employee base enabling them to better serve customers and drive sales is a strong example of tying the impacts of DEI to business outcomes.*
4. **Refresh your issue advocacy decision-making frameworks** | Over the past few years, many companies have built and leveraged decision-making frameworks to guide decisions on if, and how, to vocally advocate around issues both internally and externally. The environment around social issues and DEI has shifted rapidly alongside a shift to an administration that has shown a willingness to publicly engage with companies and organizations that may vocally oppose or support issues important to leaders. With new

rules of engagement, these decision-making frameworks should be refreshed and tested against new scenarios aligned with the current environment.

5. **Think long-term and hold your values close** | Social movements come and go, and the pendulum will continue to swing in different directions. Public statements and announcements move the starting line and make it more challenging to shift positions or policies in the future. Assess decisions to engage with both short and long-term impact in mind. Consider that any communication invites reactions from stakeholders on both sides of the issue and leverage your values alongside a deep understanding of your audiences and what risks you have to drive decision-making that you can stand behind now and in the future.

Response from the private sector

Prior to the start of the new administration, a number of companies publicly shifted significant or partial elements of their DEI programs, primarily focused on distancing from programs most likely to bring litigation such as supplier diversity targets, hiring and diversity quotas, grant or scholarship programs with identity-based eligibility requirements.

Since the new administration took office, the private sector has largely taken a wait-and-see approach, with a few exceptions:

Target

Target was the first company to publicly shift elements of their DEI programming underneath the new administration. Specific changes are limited to moving from supplier diversity to supplier inclusion, allowing their 3-year metric-based goals slated to end in 2025 to end without renewal and no longer submitting to external benchmarking lists like the HRC corporate equality index. It is important to note that Target, as a WIC supplier, holds contracts with the Federal government.

Costco

Late in the Biden-administration, Costco's shareholders introduced a proposal requesting the company report on any risks associated with their DEI programs. Last week, following the shift in administration and release of executive orders, 98% of Costco's board of directors voted to reject this proposal. It's worth noting that Costco has not traditionally publicly shared any quota or metric-based hiring or supplier diversity program.

[Costco's rejection of the shareholder proposal offers the most direct repudiation of the anti-DEI movement](#) (pg. 32-33). "The proponent's broader agenda is not reducing risk for the Company but abolition of diversity initiatives. A 2023 federal district court decision, in a case brought by the proponent, noted that the proponent had "published a document called 'Balancing the Boardroom 2022,' which describes its shareholder activism as 'fighting back' against 'the evils of woke politicized capital and companies.' [The proponent went] on to describe 'CEOs and other corporate executives who are most woke and most hard-left political in their management of their corporations' as 'inimical to the Republic and its blessings of liberty' and 'committed to critical race theory and the socialist foundations of woke' or 'shameless monsters who are willing to sacrifice our future for their comforts [...] We believe that the proponent's request for a study reflects a policy bias with which we disagree and that further study and reporting would not be an efficient use of Company resources."

e.l.f. Cosmetics

Over the weekend, e.l.f. Cosmetics became the second company to vocally communicate a continued commitment to DEI despite the external environment in CEO interview with CNN. E.l.f. Cosmetics has been a consistent voice on issues relevant to their employees and consumers, who are overwhelmingly young and diverse. Nearly 75% of its roughly 500 employees are women and 40% are people of color while their customer base is primarily millennial and Gen Z, audiences most likely to support DEI.

In a statement, the CEO noted ““I think a lot is made out of this whole anti-DEI thing,” he said. “I think more people are committed to having more diverse workforces that are inclusive than there are people who are not.” adding that Costco “framed it well in terms of when they have a more diverse workforce, they see better engagement. It’s the same thing for us.”

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At the annual World Economic Forum in Davos, DEI was a significant theme for commentary from CEOs both on stages and in sit-down interviews. Below are quotes from leading CEOs from major companies. It’s worth noting that these voices have primarily been vocal before now on the premise that DEI is business critical.

- **Jamie Dimon, JPMorgan Chase CEO** | “We are going to continue to reach out to the Black community and Hispanic community, LGBT community, and the veteran community. ... Wherever I go — red states, blue states — mayors, governors say they like what we do. So we’re not trying to pander to any which side or any which thing. Now if you point to something we’re doing that’s wrong, I’d change it. And we will make modifications going forward, but we’re very proud of what we’ve done, and what we’ve done is lift up cities, schools, states, hospitals, countries, companies, and we’re gonna do more of the same.”
- **Adena Friedman, Nasdaq CEO** | “For Nasdaq, we really continue to look at everything that we do in building the right culture. We do believe that a place where we feel like people can be themselves and can operate at their highest potential, and have diversity of views, and diversity of backgrounds, actually makes us a better company and makes us perform better. So we’re going to continue to operate in that way. And I think that at the end of the day, these things come and go with different political cycles, but at the same time, I believe that there’s an undercurrent that continues to be supportive.”
- **Bill Ready, Pinterest CEO** | “People on our platform come from all walks of life, from all different backgrounds, and so we’ve been very focused on how we drive inclusivity in our platform with things like inclusive AI, with things like ‘diversity by default’ in our feed ... We’re not [changing anything], and the reason is we’ve seen it’s actually leading to better engagement, there’s consumer demand for it, it’s good for our business.”
- **Chuck Robbins, Cisco CEO** | “I think what happened is there’s a subset of initiatives under the DEI brand that were particularly disliked. And I think the whole thing got blown up because of that ... If I’m sitting in a room to try to solve a complex problem or to chase a big opportunity, I want a lot of diverse brains in that room, and I don’t care if it’s gender or if it’s nationality or if it’s just diversity of experience. Diversity in general is good for business. But I think the pendulum swung and I think it was a handful of issues that really triggered it all.”
- **Robert Smith, Vista Equity Partners CEO** | “I think that diversity is a great thing in business. How do I know? Because I look at the data, I look at the facts. When we have diverse teams, our teams are more productive. We have lower risk. We’re actually able to out-produce those who don’t have diverse teams. The facts all suggest that. Now, how that gets implemented and executed, I think is where there’s dialogue and debate. I think companies and executives who actually understand the importance of diverse thinking in the work that they do, in the products that they deliver, and in the markets they serve will benefit long term ... We will have to navigate through this, and there may be certain laws to change. We have to make adjustments to it, but people will do the right thing.”
- **Alexandr Wang, Scale AI CEO** | “We operate in an incredibly competitive and fast-moving industry in AI, and I don’t have any option but to hire the best and most brilliant and most capable people for every single job inside my company. So as a result, we have no option but to be meritocratic ... And in the process, we achieve diversity.”

In the latter half of 2024, with an increase following the results of the election, several companies publicly announced shifts to their DEI strategies.

Please note that within this section, where possible, we have linked directly to corporate statements and announcements. In many cases, the direct statements offer more nuance and clarity than media coverage which is generalizing all DEI announcements as being rolled back or ending.

- [Tractor Supply Co.](#) | [Targeted by Robby Starbuck, DEI initiatives were moderate and response included philanthropy and broader sustainability implications.]
- [Brown-Forman](#) | [Targeted by Robby Starbuck, DEI initiatives were moderate and included metric-based hiring and supplier diversity targets.]
- [John Deere](#) | [Targeted by Robby Starbuck, DEI initiatives were limited prior to attack and did not include metric-based hiring and supplier diversity targets.]
- [Harley Davidson](#) | [Targeted by Robby Starbuck, DEI initiatives were limited prior to attack including the earlier restructuring away from DEI team and removal of metric-based targets for hiring and supplier diversity.]
- [Lowe's](#) | [Proactively reviewed DEI following SCOTUS affirmative action ruling, modified ERGs, corporate sponsorship priorities and external listings. Pushed back on Robby Starbuck's claims of influence and corrected the record on AI-generated video of CEO anti-conservative statements.]
- [Ford Motor Company](#) | [Ended supplier quotas, involvement in indexes and surveys, re-scoped ERGs, halted donations to DEI aligned organizations. Referenced shifting legal and political environment, pushed back against Robby Starbuck claims of influence, indicating shifts were underway.]
- [Molson Coors](#) | [Ended DEI-based training programs and supplier diversity quotas, participating in the Human Rights Campaign's Corporate Equality Index, changed the focus of their employee resource groups to business resource groups and shifted philanthropic giving to align to the business. Pushed back against Robby Starbuck claims of influence, indicating shifts were underway.]
- [Stanley Black & Decker](#) | [Company has not publicly commented, however following the launch of a campaign from Robby Starbuck their DEI page was scrubbed, according to Axios. As of now, their website is back with subtle shifts to language.]
- [Amazon](#) | [In a [December memo](#) to employees, Amazon said it was "winding down outdated programs and materials" related to its efforts around DEI.]
- [Boeing](#) | [Dismantled it's global DEI department, ended metric-based hiring goals, faced significant external pressure from special interests connecting diversity to safety issues.]
- [McDonald's](#) | [Referencing a civil rights audit, retired setting aspirational diversity goals, paused external surveys, retired a mutual DEI pledge for suppliers and shifted their language from diversity to inclusion.]
- [Meta](#) | [Referencing the legal and policy environment, Meta's cuts include eliminating its DEI team, sunsetting supplier diversity efforts, ending their diverse slate approach to hiring, ending representation goals and shifting equity and inclusion programs to focus on eliminating bias for all.]
- [Nissan](#) | [No longer participating in LGBTQ+ surveys and events and ending mandates for diversity-related trainings, acknowledged conversations with Robby Starbuck.]
- [Toyota](#) | [No longer participating in external DEI measurements or surveys, ensuring philanthropy and community engagement is aligned to business areas.]
- [Walmart](#) | [Phasing out DEI language and the term Latinx, no longer participating in HRC surveys, re-evaluating supplier diversity programs and allowing it's 5-year commitment to the Center for Racial Equity to wrap as planned in 2025 without continuation.]

Must-Read Explainers

1. How Trump's Assault on DEI Will Ripple Across Corporate America, [Wall Street Journal](#)
2. Trump's Attack on 'Illegal' DEI Disorients Corporate America, [Bloomberg](#)
3. Trump's D.E.I. Order Creates 'Fear and Confusion' Among Corporate Leaders, [The New York Times](#)
4. Trump message to corporate America: Stop 'illegal' DEI or face investigations, [USA Today](#)
5. Costco shareholders overwhelmingly reject anti-DEI proposal, [Business Insider](#)
6. Trump rolls back bedrock civil rights measure in sweeping anti-DEI push, [Axios](#)
7. The D.E.I. Retreat Has Some Notable Holdouts, [The New York Times](#)
8. explainer: Trump says corporate diversity efforts are illegal - but are they?, [Reuters](#)
9. Trump signed an order ending DEI. Here's what it means for Fortune 500 companies, [Fortune](#)

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