



September 27, 2013

The Secretary
Ontario Securities Commission
20 Queen Street West
22nd Floor
Toronto, Ontario M5H 3S8
comments@osc.gov.on.ca

Dear Sir or Madam,

In response to the request for feedback on the OSC Staff Consultation paper 58-401 "Disclosure Requirements Regarding Women on Boards and in Senior Management" Artis REIT appreciates the opportunity to comment.

With demographic shifts, advances in technology and communications, and globalization, diversity is quickly becoming a driver of growth around the world.

Gender disclosure by itself is not all-inclusive and in that sense is discriminatory - particularly if the focus is only at the C-Suite and Board level.

If disclosure of this nature is deemed relevant, then FULL diversity should be disclosed. The focus should not just be on gender, but should include all diversity categories such as gender, visible minorities, disabled, Aboriginal – and by age brackets and professions. This form of disclosure would provide information that is much more complete and relevant to the corporate investor and stakeholder communities.

Maximizing the potential of a diverse workforce is not only a social imperative, but is also a competitive advantage. From a business vantage point, to best serve the market, one must employ the market.

Yours truly,

A handwritten signature in purple ink that reads "Tricia Veness".

Tricia Veness, B.A., CHRP, C.D.
Human Resources Manager
Artis REIT