



Legal Leaders
for Diversity

October 2, 2013



The Secretary
Ontario Securities Commission
20 Queen Street West
22nd Floor
Toronto, ON M5H 3S8

Dear Sirs/Mesdames:

**Re: OSC Staff Consultation Paper 58-401
Disclosure Requirements Regarding Women on Boards and in Senior Management**

The Legal Leaders for Diversity and Inclusion (LLD) is an organization of over 70 General Counsel from corporations from across Canada. We are General Counsel for some of Canada's largest and most successful corporations.

In May 2011 the LLD was launched. Since then our organization has grown and we have been involved in a number of initiatives all in support of creating a more diverse and inclusive legal profession.

We have attached our poster which includes our statement of support and our 17 best practices. The General Counsel signatories support initiatives which promote diversity. In many cases our organizations have submitted comprehensive position papers to the OSC initiative, but we felt that it was important for the OSC to know that we exist and support diversity initiatives which address areas where challenges exist and heretofore these challenges have not been resolved.

Historically, Canadian boards have been slow to reflect the diversity of the Canadian population. There is no shortage of talented diverse candidates to serve on boards, and this is particularly true for women. We believe that diverse teams are more innovative and provide better solutions to problems. In the case of boards, more diverse boards will result in strong and effective governance, particularly when it reflects better the experienced and talented women who are available to serve on boards.

We believe that our success with diversity and inclusion initiatives is important for the success of the Canadian economy particularly as Canadian businesses compete globally.

Sincerely,

Melissa Kennedy
Chair

Legal Leaders for Diversity

A Statement of Support for Diversity and Inclusion by General Counsel in Canada

WE COMMIT TO PROMOTING DIVERSITY IN THE WORKPLACE. We value the range of perspectives, ideas and experiences that diversity provides, whether grounded in gender, race, sexual orientation, disability, cultural background, religion or age.

WE BELIEVE DIVERSITY AND INCLUSION CREATE A BROADER, RICHER ENVIRONMENT that enhances creative thinking, innovation and problem solving. Inclusive organizations attract and retain top talent.

WE WILL THEREFORE ENCOURAGE GREATER DIVERSITY AND INCLUSION in our own businesses and co-operate to foster these same values throughout the legal profession and the larger Canadian business community.

WE UNDERTAKE TO PRACTICE AND ADVANCE DIVERSITY AND INCLUSION BY:

- Promoting diversity within our own departments;
- Considering diversity in our hiring and purchasing practices;
- Encouraging Canadian law firms to follow our example;
- Promoting diversity initiatives at all levels in the legal and business community;
- Measuring the effectiveness of our efforts.

WE, AS ADVOCATES FOR DIVERSITY AND INCLUSION, will demonstrate our commitment through specific actions including one or more of the "Be an Advocate" initiatives.

A large grid of logos from various Canadian companies and organizations, including Deloitte, IBM, Jibey, nexen, CIBC Mellon, bp, Teachers' Pension Plan, MTS Allstream, Bell, Manulife Financial, Xerox, and many others. Each logo is accompanied by a handwritten signature.

Legal Leaders for Diversity

Be an Advocate

1. Create a "diversity-friendly" law department through actions as well as words. Know your organization's diversity plan and talk to your groups about it to make sure they understand how important it is. Be visible in your support; attend your organization's diversity events.
2. Hire from a diverse pool. Establish a diversity intranet website to show role models for career progression.
3. Make diversity and inclusion a standing item on quarterly team meeting agendas.
4. Build diversity and inclusiveness plans into employee reviews.
5. Create a mentoring program within your law department where lawyers mentor people from diverse backgrounds. Consider two-way- and reverse-mentorship programs, and also mentoring outside your organization.
6. Make coaching in diversity and inclusiveness part of all leadership training. Educate your organization's leaders to ensure they understand, champion and effectively communicate the business case for diversity and inclusion.
7. Consider establishing an External Diversity Advisory Committee to guide business leadership. Find ways to measure success and hold leaders accountable for progress in diversity and inclusiveness.
8. In dealing with outside law firms, make sure they know diversity is one of your organization's core values and that you expect to see diversity and inclusiveness on your legal teams.
9. Retain minority- or women-owned law firms whenever possible.
10. Support vendors and suppliers whose ownership or employee base reflects a commitment to diversity and inclusion.
11. Be an Advocate. Speak with other CLOs about diversity and inclusiveness and share best practices.
12. Join with law schools to support initiatives such as Minority Law Job Fairs.
13. Help develop Diversity Employee Networks and act as an Executive sponsor of one of them.
14. Participate in or host a meeting of Legal Leaders for Diversity and Inclusion.
15. Find and support an organization that promotes diversity, such as a youth program or TRIEC.
16. Participate in programs such as ITLP where you host internationally trained lawyers in your law department.
17. Use your general counsel networks to support diversity and inclusiveness initiatives.