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WE Charity
339 Queen St E,
Toronto, ON
M5A 1S9

Dear Sirs:

Re: Independent Assessment of WE Employment Policies and Practices

Introduction

You have asked me to conduct an independent assessment of the employment policies and procedures of WE Charity, ME to WE Social Enterprises Inc., and the ME to WE Foundation. I will refer to the three organizations collectively as “WE”. Specifically, I have been asked to do so in the following contexts:

- WE’s workplace culture
- The journey of WE’s younger staff
- Employee compensation
- Health and safety policies and practices at WE
- Policies and practices regarding harassment at WE
- WE’s overall policies
- WE’s senior leadership

My assessment is based on the documents provided to me by WE, which include:

- Sample employment contracts
- WE’s policies;
- WE’s training documents;
- WE’s internal HR documents;
- Testimonials from current and former employees of WE;
- Data compiled from WE staff surveys; and
- Other third party reviews.

I have been ably assisted in my task by Elizabeth Rathbone and Catherine Fan of Paliare Roland Rosenberg Rothstein LLP. However, I have conducted my review on a completely independent basis. The conclusions I have drawn are entirely my own.

Discussion

A. *WE's Workplace Culture*

WE has grown rapidly since it was founded 23 years ago. In that time, WE has continually evolved its human resources strategy as it has expanded the scale of its operations and size of its workforce. Nonetheless, the evidence appears to be that WE employees strongly identify with its workplace culture. The results of WE's internal employee surveys, employee testimonials, and the conclusions of a third party independent review all point in that direction.

In WE's latest anonymous employee engagement survey, 95% of WE employees who responded to the survey reported that they believe in and identify with the culture of the organization. A majority of those employees also reported that they enjoyed working with their co-workers, and that they had strong team dynamics. I have also been provided with a number of testimonials from present and former staff to similar effect.

In addition, an independent review conducted by Lee Hecht Harrison Knightsbridge ("LHHK"), a human resources consulting firm, has also concluded that WE has a strong mission-driven and collaborative culture. LHHK's conclusions are based on interviews with a randomly selected but representative group of employees.

Based on these facts, it is my view that WE has a healthy workplace culture.

B. *The journey of WE's younger staff*

Over 85% of WE's employees are under the age of 35. WE's entry-level positions are frequently staffed by recent university or college graduates with no formal work experience. Testimonials from present and former staff members express surprise and delight at the number of responsibilities and opportunities that employees are given early on in starting out with WE. This kind of experience is invaluable for talented young people starting out.

WE models its programs for its younger employees after other well-established organizations like Teach for America, City Year, and the Peace Corps. I am advised that new hires typically stay on with WE for an average of 2.4 years. The data I received shows that is very comparable to other employers in the non-profit, education, and government sector. WE's exit surveys show that half of employees who leave do so to pursue further education.

Employees who stay with WE for longer periods of time are given the opportunity to advance within the organization with concomitant increases in pay and responsibility. Moreover, WE's 2018/2019 People Plan has committed to implementing talent reviews to create career paths for high performers, as well as targeting manager development at all levels of the organization.

In short, this workplace journey of WE's young staff speaks for itself.

C. Employee Compensation

WE has recently reviewed its compensation figures for both staff and senior leadership.

Based on data provided to me by WE, WE's staff are compensated in line with employees of similar experience and skill at similarly-sized non-profit organizations. WE's employees also benefit from a comprehensive package of health and wellness benefits, professional development opportunities, and state-of-the-art facilities in Toronto.

Third party reviews suggest that WE's senior leadership are also compensated in line with their counterparts at comparable non-profit organizations.

D. Health and Safety Policies And Practices

In my opinion, WE's policies regarding workplace health and safety in its offices in Ontario are comprehensive and comply with relevant Ontario law. There are certain health and safety risks associated with international travel, which is a component of many employees' work within WE given the mission of the organization. Under WE's policies, WE is transparent about these risks and takes steps to mitigate them by, for instance, recommending that its employees obtain private travel insurance and reimbursing the cost in certain circumstances.

E. Harassment

In my opinion, WE's policies regarding workplace harassment and discrimination are both comprehensive and compliant with the applicable Ontario law. I note that Singh Lamarche LLP, which also reviewed WE's policies regarding discrimination, harassment, and violence, concluded that WE's policies complied with the relevant Ontario legislation.

In my view, WE's practices regarding harassment appear to be appropriate. Employees have multiple ways to report incidents of inappropriate behaviour, including anonymously through an online portal. When WE receives such a report, a member of WE's HR team conducts an internal investigation into the concerns. The investigation notes and assessment are then provided to WE's Chief People Officer, who determines what, if any, disciplinary action is necessary with consultation from relevant groups.

In light of the material I have reviewed, it is my view that WE's harassment policies and procedures are sound.

F. WE's Overall Policies

The discussion above covers what are, in my view, the main policies that affect the employer-employee relationship. While you have also provided me with a number of other policies, none appear central to this relationship. I do not propose therefore to deal with them in my review. However, I would be happy to discuss them with you if you think it helpful.

G. WE's Senior Leadership

As this letter describes, based on the information provided to me, my assessment of the employment policies and practices of WE in the contexts above is entirely positive. As with any organization, WE's employment policies and practices and the positive consequences that result for employees inevitably reflect the tone set and the leadership provided by WE's senior executives. WE's workplace culture reflects this positive influence.

Yours very truly,

A handwritten signature in blue ink, appearing to read "Stephen Goudge".

Hon. Stephen Goudge, Q.C.
SG/sb