



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

2024-2025

ANNUAL REPORT

Conflict of Interest Act

Honourable Konrad von Finckenstein, C.M., K.C.

Conflict of Interest and Ethics Commissioner

Conflict of Interest and Ethics Commissioner – Annual Report 2024-2025, in respect of the
CONFLICT OF INTEREST ACT

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062025-122E



Office of the
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Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

June 2025

The Honourable Raymonde Gagné, C.M., O.M., Senator
Speaker of the Senate
Senate of Canada
2 Rideau Street, Room E64-A
Ottawa, Ontario K1A 0A4

Dear Madam Speaker:

I am pleased to submit to you my report on the performance of the Commissioner's duties and functions under the *Conflict of Interest Act* in relation to public office holders, for the fiscal year ending March 31, 2025, for tabling in the Senate.

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Hon. Konrad von Finckenstein, C.M., K.C.
Conflict of Interest and Ethics Commissioner



Office of the
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à l'éthique

June 2025

The Honourable Francis Scarpaleggia, M.P.
Speaker of the House of Commons
House of Commons
West Block, Room 233-C
Ottawa, Ontario K1A 0A6

Dear Ms. Speaker:

I am pleased to submit to you the report on the performance of the Commissioner's duties and functions under the *Conflict of Interest Act* in relation to public office holders for the fiscal year ending March 31, 2025, for tabling in the House of Commons. The report is deemed permanently referred to the House of Commons Standing Committee on Access to Information, Privacy and Ethics, under Standing Order 108(3)(h)(v).

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Hon. Konrad von Finckenstein, C.M., K.C.
Conflict of Interest and Ethics Commissioner

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COMMISSIONER'S MESSAGE



I am pleased to report on the administration of the *Conflict of Interest Act* in 2024-2025.

This was my first full fiscal year as part of my seven-year mandate as Commissioner. The activities reported here reflect the approach taken by the Commissioner's Office in the last year.

That approach focuses on our mandate, and it supports three key objectives.

One, foster public confidence that the actions of elected and appointed federal officials are free from conflicts of interest.

Two, help public officials manage their conflicts of interest so the most competent and qualified people can move in and out of public service without any problems.

Three, examine and report on allegations of conflicts of interest that involve elected or appointed federal officials. In 2024-2025, we published three investigation reports under the *Conflict of Interest Act* and reviewed over a dozen case files.

The Commissioner's Office uses various tools to achieve these objectives, including one-on-one interface with each elected or appointed official, training and educational resources, and our website.

The *Conflict of Interest Act* strikes a balance between confidentiality, to protect public office holders' privacy, and maximum transparency, to support accountability. We apply both these concepts in our work.

Confidentiality ensures public office holders can freely and openly share their issues with us.

Transparency allows us to be as open as possible with Parliament and the public about everything the Commissioner's Office does. Everyone should understand what we are doing and why we are doing it. This helps ensure the credibility of the Act and its administration.

The Commissioner's Office is committed to being efficient and making decisions quickly. When there are allegations of wrongdoing, quick resolutions are essential as reputations may be at stake.

Building on the work of the previous year and the principles identified above, we have developed a five-year strategic plan.

We look forward to implementing this approach in the upcoming years and meeting new challenges.

A handwritten signature in black ink, appearing to read 'Konrad von Finckenstein', with a stylized, flowing script.

Hon. Konrad von Finckenstein, C.M., K.C.
Conflict of Interest and Ethics Commissioner

VISION, MISSION AND MANDATE



Vision

To safeguard public confidence in the integrity of Parliament and government institutions.



Mission

To help elected and appointed public officials avoid conflicts of interest.



Mandate

Administer the *Conflict of Interest Code for Members of the House of Commons* and the *Conflict of Interest Act* so as to manage conflicts of interest.

The Commissioner's Office has identified four priorities in its 2025-2030 Strategic Plan to advance its vision, mission, and mandate:

- **Avoiding conflicts of interest**

Improve processes and resources to help public officials manage conflicts of interests efficiently, while supporting transparency and accountability.

- **User-friendly experience**

Ensure every interaction with public officials is positive, seamless and user-focused, engendering trust and satisfaction.

- **Healthy and fulfilling workplace**

Foster a healthy, inclusive work environment where employees always act with integrity. Support diversity, professional development, and hybrid work.

- **Tools, knowledge, and skills**

Give employees modern tools and training so they have the knowledge and skills to effectively carry out the mandate of the Commissioner's Office.

FOSTERING PUBLIC CONFIDENCE

A key objective of the Commissioner's Office is to help Canadians trust that the actions of elected and appointed public officials at the federal level are free from conflicts of interest.

Canadians must feel confident that those officials do not use their public office for private gain. The things they do in their jobs should be to benefit the public, not themselves or someone they know. Competing interests must not interfere with their ability to be fair and objective.

Everything the Commissioner's Office does—from advising public officials to reporting to Parliament—ultimately aims to foster this public confidence.

This report highlights how it works to build public trust in the activities of public office holders, who are all subject to the *Conflict of Interest Act*. This group consists mainly of federal officials appointed to their positions by the Governor in Council (the Governor General acting on the advice of Cabinet) or a minister.

Some of them must follow only the Act's general rules. These **public office holders without reporting obligations** are mostly part-time members of federal boards, commissions and tribunals, and ministerial staff who work on average less than 15 hours a week.

The rest, mostly full-time officials, must follow extra rules under the Act. These **reporting public office holders** include ministers, ministers of state (who may be called "secretaries of state") parliamentary secretaries, ministerial staff who work on average 15 hours or more a week, and some senior public servants.

Snapshot of all public office holders subject to the Act on March 31, 2025 2,868	
Reporting public office holders 1,329	Public office holders without reporting obligations 1,539
25 ministers 0 parliamentary secretaries* 721 ministerial staff 583 people appointed to other positions	1,539 part-time members of federal boards, commissions and tribunals, and some part-time ministerial staff
The number of people subject to the Act went up and down during the year. <small>*When Parliament is dissolved for a general election, parliamentary secretaries lose their positions</small>	

Turnover among public office holders in 2024-2025	Newly appointed or reappointed	Left office
Reporting public office holders	320	419
Public office holders without reporting obligations	410	181
Total	730	600

Confidentiality and transparency

The complementary concepts of keeping things private and being open are key to the work of the Commissioner's Office.

Confidentiality encourages public officials to communicate freely and openly with the Commissioner's Office, and to ask it for advice when faced with a situation that may put them in a conflict of interest.

When public officials disclose information to the Commissioner's Office, other than statutorily protected information, most of it is kept confidential. The Office uses this information to help them arrange their affairs to avoid conflicts of interest, and to make sure they are following the rules.

The *Conflict of Interest Act* has strict confidentiality requirements. These allow public office holders to fully disclose their situation so the Commissioner can give them advice based on complete information.

All their interactions with the Commissioner’s Office are confidential and can only be made public by the public office holders themselves, not by the Office.

Transparency is a keystone for fostering public confidence.

It is built into the Act through its public declaration requirements. Some of the information that reporting public office holders disclose to the Commissioner’s Office must be posted in a public registry for anyone to see.

The public registry is a searchable database that can be accessed through the Office’s website. It contains all the information about public officials that the Commissioner is allowed to make public.

Public registry activities	Postings	Views
2024-2025	1,316	170,628
Five-year average	1,261	101,438

Reporting public office holders’ information stays in the public registry until the end of their cooling-off period under the Act’s post-employment rules.

The Commissioner’s Office is transparent about its own activities. It publishes quarterly statistical reports that contain data on what it is doing and how it is meeting its service standards.

Reporting to Parliament

The Commissioner has a duty to report to Parliament, testify before parliamentary committees, and answer questions from Parliament. As an independent Officer of the House of Commons, he reports to Parliament directly, not through a minister.

By June 30 each year, the Commissioner sends a report on the administration of the *Conflict of Interest Act* to the Speakers of the Senate and the House of Commons for tabling.

The Commissioner’s Office sends communiqués to parliamentarians about its reports and other activities. It sent four of these in 2024-2025.

The House of Commons Standing Committee on Access to Information, Privacy and Ethics has oversight responsibility for the Commissioner’s Office. The Committee reviews its annual spending estimates, and matters related to the Commissioner’s reports under the Act.

Committee appearances in 2024-2025

April 16, 2024	House of Commons Standing Committee on Access to Information Privacy and Ethics, Main Estimates 2024-2025 Commissioner Konrad von Finckenstein appeared with Sandy Tremblay, Director, Corporate Management Melanie Rushworth, Director, Communications, Outreach and Planning
June 4, 2024	House of Commons Standing Committee on Access to Information Privacy and Ethics, Compliance of a Minister with the <i>Conflict of Interest Act</i> Commissioner Konrad von Finckenstein appeared with Lyne Robinson-Dalpé, Director, Advisory and Compliance
August 8, 2024	Standing Committee on Public Accounts Report 1, ArriveCAN of the 2024 Reports of the Auditor General of Canada Commissioner Konrad von Finckenstein appeared with Michael Aquilino, Legal Counsel
September 16, 2024	Standing Committee on Industry and Technology Recent Investigation and Reports on Sustainable Development Technology Canada Commissioner Konrad von Finckenstein appeared with Michael Aquilino, Legal Counsel
September 17, 2024	Standing Senate Committee on National Finance Main Estimates 2024-2025 Commissioner Konrad von Finckenstein appeared
September 24, 2024	House of Commons Standing Committee on Procedure and House Affairs Forms and Procedural and Interpretative Guidelines from the Conflict of Interest and Ethics Commissioner (in camera meeting) Commissioner Konrad von Finckenstein appeared with Lyne Robinson-Dalpé, Director, Advisory and Compliance
October 21, 2024	House of Commons Standing Committee on Public Accounts Report 6, Sustainable Development Technology Canada, of the 2024 Reports 5 to 7 of the Auditor General of Canada Commissioner Konrad von Finckenstein appeared with Michael Aquilino, Legal Counsel

Proposed amendments

During some of these appearances, the Commissioner was asked if there were any legislative changes he would recommend.

Drawing on his experience, he has proposed amendments to the *Parliament of Canada Act*, under which the Commissioner is appointed, and the *Conflict of Interest Act*, which

he administers. They would help the Commissioner's Office function more effectively, and administer the Act more efficiently.

The wording of these proposed amendments can be consulted in Appendix B.

Appointment of an interim Commissioner

Amend the *Parliament of Canada Act* to allow the Commissioner of Lobbying of Canada to temporarily take over the duties of the Conflict of Interest and Ethics Commissioner when no interim or permanent Commissioner has been appointed.

Under subsection 82(2) of this Act, if the Commissioner is absent, unable to perform their duties, or leaves the position, the Governor in Council may appoint a qualified person to temporarily fill the role for up to six months.

This can take a long time. While the Commissioner's Office can keep managing the day-to-day tasks of administering the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*, there are some things it cannot do. For example, a Commissioner's authority is needed to conduct investigations, reimburse blind trust costs, approve compliance measures, issue administrative monetary penalties, and waive or shorten cooling-off periods.

Adding apparent conflicts of interest

Include apparent conflicts of interest in public office holders' general duty, set out in section 5 of the Act, to arrange their private affairs in a manner that will prevent all forms of conflicts of interest.

The recommendation to amend the Act to incorporate the appearance of conflict was proposed, perhaps most notably, in the 2010 report of the Oliphant Commission. In that report, Commissioner Oliphant noted that an apparent conflict of interest is understood to exist if "there is a reasonable perception, which a reasonably well-informed person could properly have, that a public office holder's ability to exercise an official power or perform an official duty or function will be, or must have been, affected by his or her private interest or that of a relative or friend."

The *Conflict of Interest Code for Members of the House of Commons* requires Members to avoid both real and apparent conflicts of interest. Similar language is used in the *Values and Ethics Code for the Public Sector*, which governs the conduct of all federal public servants.

The Commissioner is of the view that public office holders should not be subject to a less stringent standard of conduct than parliamentarians and public servants. As the Supreme Court of Canada has observed, integrity in the democratic process can be harmed just as easily by the appearance of impropriety as by the actual impropriety.

Review of exempt and controlled assets

Amend the *Conflict of Interest Act* to allow the Governor in Council, on the Commissioner's recommendation, to designate certain types of assets as exempt assets under the Act if the Commissioner believes they pose no risk of conflict of interest.

Section 20 of the Act lists assets that reporting public office holders are not allowed to own (called "controlled assets") and those that are exempt from any compliance measure ("exempt assets"). Controlled assets are assets whose value could be directly or indirectly affected by government decisions or policy, like publicly traded securities.

Since the Act came into force in 2007, many new investment assets and vehicles have entered the market, like tax-free savings accounts (TFSAs), exchange-traded funds (ETFs) and cryptocurrencies. The Commissioner has no discretion to exempt assets that pose little risk of conflict of interest, like an ETF that is not managed by a reporting public office holder.

Harmonize the definitions of "private interest"

Align the Act's definition of private interest with the definition in the *Conflict of Interest Code for Members of the House of Commons*.

Under the Code, a Member is not considered to be furthering private interests if the matter in question affects them or any other person as one of a broad class of the public. Under the Act, a similar exclusion for matters that affect the interests of a broad class of persons refers only to the public office holder, not to other persons.

The proposed change to the Act would clarify that public office holders can participate in matters involving the private interests of their friends or relatives, if those interests are the same as those of other members of the broad class they are part of.

Expanding allowed outside activities

Give the Commissioner the discretion to allow reporting public office holders to engage in any outside activities that the Commissioner believes would not cause a conflict of interest with their official duties.

The Act restricts the activities of reporting public office holders that are not part of their official duties. For example, they are not allowed to have a job, practise a profession, manage or operate a business or commercial activity, or sit on a board of directors.

There are three limited exceptions that allow them to engage in certain outside activities if the Commissioner believes these would not cause a conflict of interest. However, there are no exceptions for many other activities that may not cause a conflict, like teaching part-time at a university.

Increasing administrative monetary penalties

Increase the maximum amount of administrative monetary penalties to \$3,000 to underscore the importance of meeting the Act's reporting requirements.

The Commissioner can impose administrative monetary penalties of up to \$500 on reporting public office holders who do not meet administrative reporting deadlines.

Although this provision aims to encourage compliance rather than to punish, it is not an effective incentive because the amount is so low. Too many public office holders continue to contravene the most basic compliance rules on timely and accurate filing of reports and material changes to their interests, or treat it as a minor task that can be ignored.

Public communications

In support of transparency, the Commissioner’s Office communicates as openly with the public as it is allowed to under the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*. It shares as much information as it can, and in different ways.

For example, it posts information on its website.

Website usage	2024-2025
Users	127,500
Page views	280,000

This year, the website attracted twice as many users and had twice as many page views as the year before. Website traffic rose in the last two quarters.

The Commissioner’s Office designed and built a new website so different users can quickly and easily find the information they are looking for. The content is written in plain language to make it more accessible. The website will be launched in 2025-2026.

The Commissioner’s Office uses social media to share information about its activities and updates from the public registry that may be of interest to journalists, academics, Canadian and international ethics practitioners, and others.

Social media usage	X @EthicsCanada @ÉthiqueCanada	LinkedIn @ethics-ethique-canada
Posts	79	80
Followers	4,357	1,052

It responds to journalists and members of the public who seek information by telling them as much as possible about how the Act and the Code work, and directing them to the public registry when appropriate.

Media inquiries in 2024-2025

114 emails and phone calls from members of the media

- Over 85% were questions about a specific elected or appointed official, or the status of a current case file
- About 10% were general inquiries about the Office's role and mandate
- 5% were about the Commissioner's investigation reports

Public inquiries in 2024-2025

400 emails and phone calls from members of the public

- 80% did not fall within the Commissioner's mandate and were redirected
- 20% were general inquiries about the role of the Office or complaints about a particular official. Some were shared with the Investigations division for follow-up

The Commissioner's Office also gives presentations about its work to interested audiences that in 2024-2025 included:

- Dalhousie University, Ethics in Action course
- Carleton University, Ethics in Political Management course
- Many Facets of Parliament, a seminar for parliamentary employees
- Montreal Integrity Network, a network of professionals who help organizations develop ethics and compliance programs

Connecting with others

The Commissioner's Office works with other organizations to stay updated on and share best practices. This collaboration supports its objective of fostering public confidence that elected and appointed officials' actions are free from conflicts of interests.

It continues to coordinate information sharing within the Canadian Conflict of Interest Network (CCOIN) of federal, provincial, and territorial conflict of interest commissioners.

In September 2024, the Commissioner, a Legal Counsel and the Director of Communications, Outreach and Planning attended CCOIN's annual meeting, hosted by Ethics Commissioner Ariane Mignolet in Quebec City.

The Commissioner's Office is a member of the Ethics Practitioners Association of Canada (EPAC). With members from government, business, voluntary sector, and the academic community, EPAC promotes ethical practices in organizations, and supports ethics practitioners across Canada.

It is an active member of two international ethics organizations.

The Réseau francophone d'éthique et de déontologie parlementaires (RFEDP) promotes exchanges between parliaments and entities in the Organisation internationale de la Francophonie that are interested in ethics and codes of conduct.

RFEDP activities in 2024-2025:

- The Commissioner, the Director of Advisory and Compliance, and the Director of Communications, Outreach and Planning participated in its 2024 Annual General Meeting, held in Brussels.
- As a member of the RFEDP's Bureau, the Director of Advisory and Compliance participated in a May 2024 seminar in French Polynesia as a speaker and moderator. It was part of an ongoing RFEDP project to train parliamentarians in the Francophonie on avoiding conflicts of interest. In July, she attended a meeting of the Bureau in Montreal, while participating in bilateral discussions and committee meetings during the annual meeting of the Assemblée parlementaire de la Francophonie.

The Council on Governmental Ethics Laws (COGEL) is a U.S.-based organization of government ethics practitioners.

COGEL activities in 2024-2025:

- Office representatives attended COGEL's 2024 conference, held in Los Angeles in December 2024, and joined several virtual events during the year.

Other international outreach activities:

- In May 2024, the Commissioner's Office gave input to Global Affairs Canada for its response to a questionnaire on the G20 Anti-Corruption Working Group Accountability Report.
- In March 2025, an Office representative attended the 2025 OECD Global Anti-Corruption and Integrity Forum (hosted by the Organisation for Economic Co-operation and Development).

HELPING APPOINTED OFFICIALS MANAGE CONFLICTS OF INTEREST

Another key objective of the Commissioner's Office is to help public officials manage their potential conflicts of interest so the most competent and qualified people can move in and out of public service without any problems.

This reflects two of the *Conflict of Interest Act's* purposes:

- to encourage experienced and competent people to seek and accept public office, and
- to facilitate interchange between the private and public sectors.

When it appoints people from the private sector to federal positions, the Government of Canada benefits from a broad range of skills, experiences, and perspectives.

Like all experienced people, these individuals may face potential conflicts between public and private interests.

The Commissioner's Office helps public office holders avoid and manage conflicts of interest by giving them information about the Act's rules. It also guides them on how to follow those rules and submit required information.

In August 2024, the Commissioner's Office reported publicly on its January 2024 survey of public office holders. The results continue to guide how it communicates and engages with them.

Communications with public office holders in 2024-2025

308

emails outlining rules and obligations sent to new and reappointed public office holders without reporting obligations

422

emails outlining rules and obligations sent to new and reappointed reporting public office holders

Personal advice

The Commissioner’s Office helps appointed officials follow the rules that apply to them, by giving them information and advice when they need it, and by answering their questions promptly.

It assigns each reporting public office holder an advisor who works with them throughout their time in office. Their advisor helps them understand and follow the rules and meet the Act’s reporting requirements. Reporting public office holders can ask their advisor for advice at any time.

The Commissioner’s Office aims to contact each reporting public office holder personally within three days after learning of their appointment.

Public office holders without reporting obligations are not assigned their own advisors, but are welcome to speak with an advisor when they have questions. The Commissioner’s Office gives them information about the Act when they are appointed. Around the end of their term, it tells them about the post-employment rules they must follow. It also communicates with them while they are in office and invites them to educational sessions.

Breakdown of advice by topic	
Gifts or other advantages	294
Outside activities	545
Post-employment obligations	439
Material changes	678
General obligations	720
Total	2,676

To make sure the advice it gives public office holders is consistent, the Commissioner’s Office tracks the topics they ask about, so it can identify training needs and spot trends that might impact its workload.

When asked, the Office explains the Act’s requirements to candidates for federal appointments.

Guidance on reporting requirements

Advisors walk newly appointed reporting public office holders through the initial compliance process under the Act, which must be completed within 120 days after their appointment. It is an opportunity for them to familiarize themselves with the rules and address potential issues.

Step 1: Each reporting public office holder must give the Commissioner's Office detailed personal and financial information about themselves and their family, by filling out a Confidential Report within 60 days after their appointment.

Step 2: Their advisor reviews this information and helps them organize their affairs to avoid conflicts of interest.

For example, the reporting public office holder might have controlled assets (assets, like publicly traded securities, whose value could be affected by government decisions or policy) that the Act does not let them own. Their advisor can guide them on how to divest (get rid of) those assets. They must sell them in an arm's-length transaction (where there is no special or close connection between them and the buyer), or put them in a blind trust (transfer them to someone to hold and manage so they do not know how their money is being invested). The Commissioner's Office can help them get reimbursed (paid back) for the trust's administrative costs.

Helping reporting public office holders arrange their affairs to avoid conflicts of interests

422

initial compliance processes completed

2,676

instances of advice provided

- 812 public registry postings (includes postings related to initial compliance and ongoing reporting requirements)
- 80% of reporting public office holders submitted their initial compliance information on time. Of the rest, more than half submitted it within one week of the deadline.
- 9 conflict of interest screens set up
- 46 divestments of controlled assets (34 by sale and 12 by blind trust)
- 157 reimbursement orders issued for blind trust fees totalling \$911,078

In October 2024, the Commissioner delegated to advisors the authority to approve minimal value exemptions for controlled assets. Under subsection 27(10) of the Act, reporting public office holders who are not ministers or parliamentary secretaries may be allowed to keep some controlled assets if they are of such minimal value (up to \$60,000) that they do not pose any risk of conflict of interest in relation to their official duties and responsibilities.

Reporting public office holders might also have to quit certain outside activities (activities that are not part of their official duties) that the Act does not allow.

Their advisor can also help them set up a conflict of interest screen. A screen is a formal plan that enables them to avoid handling files that could put them in a conflict of interest.

Step 3: The advisor prepares a summary of the information in the Confidential Report. The reporting public office holder must review, sign and return this Summary Statement.

Step 4: The Commissioner's Office posts the Summary Statement in the public registry, and the initial compliance process is over.

The Commissioner's Office helps reporting public office holders meet other reporting requirements during their whole time in public office. They must tell it about the following things, within certain deadlines. Some of this information is made public.

- **Material changes.** Any changes to the information in their Confidential Report.
- **Gifts or other advantages** that they or their family members accept. They must publicly declare multiple gifts received from one source in a 12-month period with a total value of \$200 or more, within 30 days after the value reaches \$200 or more.
- **Private flights** (on non-commercial chartered or private aircraft) accepted by ministers, ministers of state or parliamentary secretaries for themselves, members of their family, or ministerial staff or advisors. The relevant minister, minister of state or parliamentary secretary must publicly declare them.
- **Recusals.** When they stepped back from a discussion, a decision, a debate or a vote on anything they might have a conflict of interest in.
- **Firm offers of outside employment.** Outside employment does not include jobs or contracts with federal government entities or federal parliamentary entities.
- **Acceptance of offers of outside employment.**

Reporting public office holders must also complete an **annual review**. Each year, they must go over their information with their advisor in the Commissioner's Office, and update it as needed. In 2024-2025, over 1,000 annual reviews were completed.

Public declarations by reporting public office holders in 2024-2025	
Agreed compliance measures	25
Assets	100
Gifts or other advantages	151
Liabilities	31
Outside activities	176
Recusals	40
Summary statements	257
Travel	3
Post-employment exemption, waiver or reduction	7
Other	4
Total	794

Education and training

The Commissioner's Office gives public office holders comprehensive education and training on the Act's conflict of interest rules and other requirements.

It delivers flexible and accessible educational opportunities for public office holders and the staff who support them through live online and in-person training, targeted outreach, and interactive learning tools. It continually updates its outreach strategies, and refines content based on emerging trends.

Offering live online training to all newly appointed public office holders is a key feature of its educational approach. In 2024-2025, the Commissioner's Office gave 14 of these educational sessions and about 16% of new public office holders participated.

It also organizes targeted educational sessions for groups of public office holders and their support staff.

Some of these are regularly scheduled sessions on popular topics. In 2024-2025, for example, to respond to an increase in questions about post-employment, it offered six educational sessions on post-employment, attended by almost 400 people.

Others are in response to requests for presentations. In 2024-2025, the Commissioner's Office gave eight presentations to audiences that included ministers' offices, deputy ministers, Crown corporations, honorary consuls, and corporate governance practitioners within the federal government. Together, they reached almost 300 individuals.

To help appointed officials understand the rules, it is developing online training on the Act that should be ready in the new fiscal year.

The Commissioner's Office issues educational documents called "information notices" to help public office holders understand specific aspects of the Act.

In 2024-2025, it revised several information notices to reflect changes of practice:

- **Post-employment rules and offers of outside employment** (March 2025) – Updated to reflect a change to the way the term "entity" is defined in the Act's post-employment rules.

During a cooling-off period of one or two years after they leave office, reporting public office holders may not contract with or work for an entity they had direct and significant official dealings with during their last year in office. The Commissioner's Office now excludes from the definition of "entity" not only federal government entities (like departments, agencies and Crown corporations) but also federal parliamentary entities (including the Senate and House of Commons). Reporting public office holders who want to work for a federal government entity or a federal parliamentary entity no longer have to seek an exemption, reduction or waiver of their cooling-off period.

While still in office, reporting public office holders must tell the Commissioner about any firm offers of outside employment they receive. The Commissioner's Office no longer requires them to disclose offers of employment from a federal government entity or a federal parliamentary entity.

- **Reimbursement of costs for divesting controlled assets and withdrawing from activities** (February 2025) – Updated to reflect a change to how reporting public office holders who put controlled assets in a blind trust may apply to get paid back for its administrative costs. Before, they had to pay for any professional services before asking for reimbursement. The Commissioner's Office no longer requires proof of payment. Now, it only needs a copy of the invoice to issue a reimbursement order.
- **Political activities** (February 2025) – Updated to better explain how ministers, parliamentary secretaries and ministerial staff can follow the Act while taking part in political activities both during and outside an election period.

Post-employment

Around the end of their term, the Commissioner's Office gives public office holders information about the Act's post-employment rules. Former public office holders are welcome to ask it for advice on how to follow those rules.

The Act's general post-employment rules apply to all public office holders for life. They are not allowed to:

- Take improper advantage of their previous public office.
- “Switch sides” on a specific proceeding, transaction, negotiation or case to which the Crown (the federal government) is a party—that is, work for or represent a person or organization on that matter after they acted for or advised the Crown on it.
- Advise a client, business associate or employer using insider information (information they got while in office and that is not available to the public).

Former reporting public office holders must also follow some extra rules during a cooling-off period (two years for former ministers and one year for former parliamentary secretaries).

Reporting public office holders may ask the Commissioner to waive or reduce their cooling-off period. If the Commissioner decides to grant a waiver or reduction, the decision and the reasons for it will be posted in the public registry.

Under section 37 of the Act, former reporting public office holders must report to the Commissioner certain communications and meetings arranged with certain federal officials. They must also report any meetings they arrange between those officials and any other person.

REPORTING ON CONFLICTS OF INTEREST

A third key objective of the Commissioner's Office is to examine and report on allegations of conflict of interest that involve federal public officials.

The Commissioner investigates public office holders when he has reasonable grounds to believe that they may have contravened the *Conflict of Interest Act*, and reports publicly on those investigations.

The Commissioner can start an investigation (called an examination) under the Act in one of two ways:

- When he is asked to investigate by a Senator or a Member of the House of Commons. They must provide reasonable grounds to believe that someone has contravened the Act. The Commissioner's Office received five examination requests from Members in 2024-2025.
- On his own initiative if he has reason to believe, based on information from various sources, that someone may have contravened the Act.

If the Commissioner stops an examination that he started at the request of a Senator or Member, he must write a report (called a discontinuance report) explaining why. If he stops an examination that he started on his own initiative, he does not have to write a report.

When the Commissioner finishes an examination, he issues a public report. He issued three examination reports in 2024-2025.

Bloom Report

In the *Bloom Report* (January 15, 2025), the Commissioner found that Mr. Glen Bloom, a former member of the Canadian Cultural Property Export Review Board, did not contravene the Act's post-employment rules.

It was alleged that Mr. Bloom had "switched sides" after leaving public office by representing an art auction house in a 2024 Review Board proceeding that appeared to be about the same issue as a 2022 Review Board proceeding in which he had participated as a Review Board member.

Under subsection 34(1) of the Act, former public office holders are not allowed to work for or represent a person or organization on a specific proceeding, transaction, negotiation or case to which the Crown is a party if they previously acted for or advised the Crown on it.

The Commissioner found that Mr. Bloom did not contravene subsection 34(1), because the two proceedings dealt with separate reviewable decisions—even though they involved the same art auction house and the same work of art.

One proceeding, in 2022, was a procedural determination about whether the Review Board could legally extend a filing deadline. The art auction house had asked the Review Board to review the Canada Border Services Agency's refusal to grant it an export permit, but missed the deadline to file its request. Mr. Bloom was a member of the panel that concluded the Review Board did not have the authority to extend the deadline. The requested review did not take place.

The other proceeding, in 2024, was a review of the merits of the Canada Border Services Agency's second refusal to give the art auction house an export permit. Mr. Bloom, who was no longer a member of the Review Board, represented the art auction house in this proceeding.

Verschuren Report

In the *Verschuren Report* (July 24, 2024), the Commissioner found that Ms. Annette Verschuren, while she was Chairperson of Sustainable Development Technology Canada (SDTC), failed to comply with subsection 6(1) and section 21 of the Act. He found she did not contravene section 9.

Under subsection 6(1), public office holders are not allowed to make a decision or participate in decision-making related to the exercise of an official power, duty or function if they know or reasonably should know that, in doing so, they would be in a conflict of interest.

Under section 21, they must recuse themselves from any discussion, decision, debate or vote on any matter in respect of which they would be in a conflict of interest. A recusal is more than simply abstaining from a vote. Public office holders must leave the room (physical or virtual).

Section 9 prohibits public office holders from using their position as public office holders to seek to influence a decision of another person to further their private interests or those of their relatives or friends, or to improperly further another person's private interests.

Finding one: After Ms. Verschuren was appointed to SDTC in June 2019, she continued to serve on the boards of the Verschuren Centre for Sustainability in Energy and the Environment, which she founded, and the MaRS Discovery District.

With respect to most funding decisions involving projects nominated by the Verschuren Centre or MaRS, Ms. Verschuren declared a potential conflict to SDTC's Board of Directors, and abstained from voting on the decisions. On four occasions, it appears she did not abstain from decisions that benefitted companies nominated by or associated with the two organizations. While she mostly abstained, she did not recuse herself in any of these cases.

Finding two: Throughout her tenure, Ms. Verschuren remained Chair, CEO, and majority shareholder of NRStor Inc., a company she founded.

The Commissioner found that she failed to comply with subsection 6(1) and section 21 of the Act when she participated in SDTC's March 2020 and March 2021 decisions to give COVID-19 emergency relief payments to all companies, including NRStor, that had previously been approved for funding. While the original payments to NRStor were approved before she became Chairperson of SDTC, she followed incorrect advice and did not recuse herself from those two subsequent decisions.

Finding three: The Commissioner found that Ms. Verschuren did not use her position as Chairperson of SDTC to try to influence other Board members in those two decisions when she moved the motions for the payments. Doing so was simply a formality of her role as Chairperson.

Ouimet Report

In the *Ouimet Report* (July 24, 2024), the Commissioner dismissed allegations that Mr. Guy Ouimet, a former director of Sustainable Development Technology Canada (SDTC), contravened the Act.

It was alleged that Mr. Ouimet contravened subsection 6(1) and section 21 of the Act by participating in SDTC's March 2020 and March 2021 decisions to give COVID-19 emergency relief payments to various companies, including Lithion Recycling Inc.

At the time of the March 2020 decision, Mr. Ouimet held an option to purchase 1% of Lithion founders' shares at a cost of \$1,250. At the time of the March 2021 decision, he had exercised his option. The Commissioner determined that his financial interest in Lithion in relation to SDTC's funding decisions was a private interest for the purposes of the Act, and that he participated in both COVID-19 emergency relief funding decisions.

However, the Commissioner also applied the principle of *de minimis non curat praetor*, which is reflected elsewhere in the Act. It is the idea that courts and decision makers are not concerned with trivial things. As Mr. Ouimet's interest in Lithion was so insignificant, there was no risk of conflict of interest.

Review of matters involving a minister

In 2024-2025, the Commissioner's Office reviewed several matters involving the business activities of Minister Randy Boissonnault, although it did not conduct an examination.

In spring 2024, prompted by media reports about Minister Boissonnault's business activities, including his ties with 2050877 Alberta Ltd. (Navis Group) and Global Health Imports Corporation (GHI), a Member of the House of Commons asked the Commissioner to investigate. The Commissioner determined that the request did not meet the requirements of section 44 of the Act because it did not set out reasonable grounds for the belief that the Act had been contravened.

In June, the Commissioner appeared before the House of Commons Standing Committee on Access to Information, Privacy and Ethics. He confirmed to the Committee that, based on the information Minister Boissonnault had voluntarily disclosed to the Commissioner's Office, it appeared he had complied with the requirements of the *Conflict of Interest Code for Members of the House of Commons* and the Act on matters involving his companies, and there was no need to investigate.

The Commissioner also said he would look into a matter raised in a news report published on the day of his appearance. The article included text messages that Stephen Anderson, who had co-founded GHI with Minister Boissonnault, forwarded to a GHI client on September 8, 2022. They appeared to have been sent by someone called "Randy" who was demanding "a partner call" with Mr. Anderson.

When appearing before the House of Commons Standing Committee on Public Accounts in August, the Commissioner said that after reviewing the information Minister Boissonnault had given him about all of his communications on September 8, he concluded there could have been no contact between him and Mr. Anderson. He also told the Committee that after becoming aware of reports of further emails, he had the day before asked Mr. Boissonnault for the same information for September 6 and 7. When he received that, he said, he would determine if there were reasonable grounds to believe that Minister Boissonnault was involved in GHI's business activities and launch an investigation, if warranted.

In September, the Commissioner informed Minister Boissonnault by letter that he considered the matter closed. He made this determination based on the information provided by Minister Boissonnault, and in the absence of any evidence giving him a reason to believe he may have been operating or managing GHI in contravention of paragraph 15(1)(b) of the Act. In keeping with the Act's confidentiality requirements, the Commissioner's Office did not make this letter public. However, Minister Boissonnault chose to share it with the media.

Penalties

There are no penalties when the Commissioner finds in an investigation that someone has contravened the Act.

However, examination reports are provided to the Prime Minister and made public on the website of the Commissioner's Office and in the public registry. This supports transparency and accountability. These reports are also educational tools that can help prevent future conflicts of interest.

Public office holders sometimes fail to meet the Act's requirements in other ways. Non-compliance is rarely deliberate, and the involvement of the Commissioner's Office usually solves the issue. If it does not, there are some mechanisms it can use to encourage compliance.

The Commissioner can impose administrative monetary penalties of up to \$500 for not for submitting information on time. In 2024-2025, the Commissioner issued 14 penalties. They are posted in the public registry.

Administrative monetary penalties

- Ten \$200 penalties paid for failing to disclose a material change relating to assets.
- Four \$200 penalties paid for failing to submit a Confidential Report within 60 days of appointment.

The Commissioner may order a public office holder to take any measure to comply with the Act. Compliance orders cover things like submitting documents for an annual review, divesting (getting rid of) controlled assets, or quitting prohibited activities. In 2024-2025, the Commissioner issued four compliance orders. All compliance orders are posted in the public registry.

Referrals from the Public Sector Integrity Commissioner

The Public Sector Integrity Commissioner may refer matters to the Commissioner under subsection 24(2.1) of the *Public Servants Disclosure Protection Act*.

Under section 68 of the Conflict of Interest Act, the Commissioner must issue a public report on each referral, whether he does an investigation or not.

The Commissioner did not report on any referrals from the Public Sector Integrity Commissioner in 2024-2025.

Case files

The Commissioner's Office sometimes receives information alleging that someone may have contravened the *Conflict of Interest Act*. The information might come from a Senator or Member of the House of Commons, media reports, or complaints from members of the public.

When it gets such information, it may open a case file. Then it does an initial review to determine if there are reasonable grounds to believe a public office holder has contravened the Act. Some of these reviews may lead to examinations. When the Commissioner finds an examination is not warranted, the case file is closed.

Total case files: 16

- Ongoing: 1
- Closed without an examination: 12
- Closed with publication of report: 3

Breakdown of case files

Subject of each case file	
Current or former minister and parliamentary secretary	8
Current or former public office holder	8
Person not subject to the Act	0
Source of these case files	
Member of the House of Commons	5
Office of the Public Sector Integrity Commissioner	0
Media	2
Member of the general public	7
Within the Office	2
Nature of the concern*	
Furthering a private interest (subsection 6(1) of the Act)	4
Duty to recuse (section 21)	3
Post-employment rules (sections 33 to 35)	4
Influence (section 9)	7
Preferential treatment (section 7)	2
Private air travel (section 12)	0
Prohibited activities (section 15)	3
Public declaration (section 25)	2
Insider information (section 8)	0
Gifts and other advantages (section 11)	1
Material changes (section 22)	1

*A case file can have more than one concern

MANAGING THE COMMISSIONER'S OFFICE

A team of 51 employees supports the Commissioner. They are experts who specialize in areas like compliance, law, communications, corporate management, investigations, and parliamentary relations.

Under the Commissioner's leadership, employees handle the daily tasks of administering the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*. They make sure the processes and structures are in place to support their administration.

They also work on other important files like compliance with the *Employment Equity Act* and the *Accessible Canada Act*. In September 2024, the Commissioner's Office released its Pay Equity Plan. In December, it released its 2024 Accessibility Progress Report.

The Commissioner provides overall direction and makes the decisions that need his input and approval. He works closely with other members of the Office's Senior Management Committee.



The Commissioner's Office devoted a lot of resources to two major projects in 2024-2025.

It partnered with House of Commons Digital Services to build a new website.

The site supports one of the focus areas identified in its 2025-2030 Strategic Plan: making sure everyone has a user-friendly experience when they interact with the Commissioner's Office.

Drawing on user surveys and testing, it was designed with the needs of users in mind. It will feature a simple structure that will be easy to navigate, and plain-language content. It will also be mobile-friendly.

Special sections for Members of the House of Commons, ministers and parliamentary secretaries, reporting public office holders, and public office holders will help these users quickly and easily find information about all the rules that apply to them. The site will also address the information needs of journalists, ethics practitioners, the academic community, and members of the public.

The Commissioner's Office expects it to launch in 2025-2026.

The other major project was a move to new workspace. Having previously reduced its footprint from two floors to one, the Commissioner's Office now occupies space that was purpose-built to better meet operational needs and accessibility requirements.

The new workspace is the first of its kind among parliamentary entities. It features larger and more flexible meeting spaces, some with sound masking technology. It incorporates new technologies that can accommodate evolving work styles and allows more employees to work collaboratively on-site. All perimeter doors and inside amenities are fully accessible.

The Commissioner's Office partnered on this project with the House of Commons Administrative Services, the Sergeant-at-Arms, the Parliamentary Protective Service, and Public Services and Procurement Canada.

To make sure it has the right positions and the right people in them to support its mandate, the Commissioner's Office ran five staffing processes in 2024-2025. No employees left.

The Office's financial statements are audited each year by an independent external auditor. Its financial information for 2024-2025 is outlined in Appendix A.

LEGAL DEVELOPMENTS

The Commissioner's decisions on investigations are sometimes challenged in court. Dealing with these cases can help clarify the Commissioner's mandate and powers.

One court case was underway in 2024-2025.

Democracy Watch had asked the Federal Court of Appeal to review former Commissioner Mario Dion's findings in the 2021 *Trudeau III Report*. He had concluded that Prime Minister Justin Trudeau did not contravene the *Conflict of Interest Act* when the government chose WE Charity to run a COVID-19 program, even though some of his family members were closely involved in some of WE Charity's projects. The Commissioner determined that the Act only covers real or potential conflicts of interest, and a situation that simply appears to give rise to an appearance of conflict does not contravene the rules.

In the Notice of Application for Judicial Review it submitted to the Court, Democracy Watch pointed out errors it believes the Commissioner made in both law and fact. It argued that the Commissioner was wrong to conclude that the Act's definition of conflict of interest excludes the appearance of conflict, and that he was wrong about Mr. Trudeau not being friends with WE Charity's cofounders.

Responding on the Commissioner's behalf, the Attorney General of Canada objected to that request because section 66 of the Act does not allow the types of grounds for review that Democracy Watch raised.

In a motion to strike the Notice of Application, the Attorney General wrote that section 66 does not allow the Court to review the alleged errors of law and fact. It limits judicial review to questions of jurisdiction, procedural fairness, and fraud or perjured evidence.

The judge who heard that motion decided that the full panel of the Court hearing the merits of Democracy Watch's application should examine the question about section 66, so it could clarify the important issue of how privative clauses should be interpreted and applied (*Democracy Watch v. Canada [Attorney General]*, 2022 FCA 208).

The Federal Court of Appeal heard the matter on March 24, 2024.

On October 2, 2024, the Federal Court of Appeal dismissed Democracy Watch's application for judicial review.

In its reasons for judgment, it wrote that the Act reflects Parliament's intention to give both Parliament and the Court distinct supervisory roles in monitoring potential conflict of interests involving public office holders. In that context, the Court said, it makes sense to insulate from review by the Court the determinations made by the Commissioner within his jurisdiction.

The Commissioner is an independent Officer of the House of Commons whose position is within the legislative branch of government. Section 86 of the *Parliament of Canada Act* makes it clear that he acts under the direction of the House of Commons when enforcing the *Conflict of Interest Code for Members of the House of Commons*.

The Court interpreted section 66 in this context. It wrote that it is very clear from the Act's requirement for the Commissioner to give his reports to the Prime Minister, that it is up to the Prime Minister to decide what to do with the Commissioner's findings, and to the House of Commons to hold the government to account. The sanction, it said, is meant to be political, not judicial. This conclusion is reinforced by the fact that the Commissioner's reports are made public, and that their conclusions do not determine what actions should be taken.

The Court was therefore of the view that cases cited by Democracy Watch do not apply to this application for judicial review. Those cases were about decisions made by quasi-judicial or administrative tribunals, and not about findings by an Officer of Parliament. It wrote that the *Conflict of Interest Act* provides for dual parliamentary and judicial oversight, with an elaborate procedure to regulate ethical conduct through political consequences. In the context of such a scheme, where accountability is intended to lie primarily with the legislative branch, courts should clearly exercise judicial restraint and adhere to the limits prescribed by section 66 of the Act in their judicial review function.

In December 2024, Democracy Watch filed an application for leave to appeal to the Supreme Court of Canada. (Leave was granted on May 1, 2025.)

APPENDIX A: FINANCIAL RESOURCES SUMMARY

	(thousands of dollars)				
Program Activity	2023-2024	2024-2025			Alignment to Government of Canada Outcomes
	Actual Spending	Main Estimates	Total Authorities	Actual Spending	
Administration of the <i>Conflict of Interest Act</i> and the <i>Conflict of Interest Code for Members of the House of Commons</i>	6,875	7,708	7,708	7,594	Government Affairs
Contributions to employee benefit plans	839	867	939	939	
Total spending	7,714	8,576	8,647	8,533	
Plus: cost of services received without charge	1,017	N/A	N/A	918	
Net cost of department	8,731	8,576	8,647	9,451	

The budget process for the Commissioner's Office is outlined in the *Parliament of Canada Act*. Each year, the Office estimates how much money it will need for the next fiscal year. The Speaker of the House of Commons reviews this estimate and sends it to the President of the Treasury Board, who presents it to the House along with the Main Estimates (the Government of Canada's budget) for that fiscal year. The Standing Committee on Access to Information, Privacy and Ethics reviews and reports on the Office's effectiveness, management and operations, and its spending plans.

The figures in this summary have not been audited. Complete audited financial statements will be posted on the Office's website.

APPENDIX B: PROPOSED LEGISLATIVE AMENDMENTS

This is the text of proposed amendments to the *Parliament of Canada Act* and the *Conflict of Interest Act* that the Commissioner has identified. Underlining indicates text that would be added or changed.

SECTION 82—TENURE *PARLIAMENT OF CANADA ACT*

82 (3) In the event of the absence or incapacity of the Commissioner, or if that office is vacant, and where no interim commissioner has been appointed under subsection (2), the Commissioner of Lobbying of Canada may exercise all the powers of a commissioner appointed under subsection 81(1).

82 (3) En cas d'absence ou d'empêchement du commissaire ou de vacance de son poste, et lorsqu'aucun commissaire par intérim n'a été nommé en vertu du paragraphe (2), le commissaire au lobbying du Canada peut exercer tous les pouvoirs d'un commissaire nommé en vertu du paragraphe 81(1).

SECTION 4—CONFLICT OF INTEREST *CONFLICT OF INTEREST ACT*

4 (1) For the purposes of this Act, a public office holder is in a conflict of interest when he or she exercises an official power duty or function that provides an opportunity to further his or her private interests or those of his or her relatives or friends or to improperly further another person's private interests.

(2) For the purposes of this Act, a public office holder is in an apparent conflict of

4 (1) Pour l'application de la présente loi, un titulaire de charge publique se trouve en situation de conflit d'intérêts lorsqu'il exerce un pouvoir officiel ou une fonction officielle qui lui fournit la possibilité de favoriser son intérêt personnel ou celui d'un parent ou d'un ami ou de favoriser de façon irrégulière celui de toute autre personne.

(2) Pour l'application de la présente loi, un titulaire de charge publique se trouve

interest if there is a reasonable perception, which a reasonably well-informed person could properly have, that the public office holder's ability to exercise an official power or perform an official duty or function must have been affected by the public office holder's private interest or the private interest of his or her relatives or friends.

en situation de conflit d'intérêts apparent lorsqu'il y a de la part d'une personne raisonnablement bien informée, une crainte raisonnable que la capacité d'exercer un pouvoir officiel ou une fonction officielle doit avoir été affectée par son intérêt personnel ou par celui d'un parent ou d'un ami.

SECTION 5—GENERAL DUTY CONFLICT OF INTEREST ACT

5. Every public office holder shall arrange his or her private affairs in a manner that will prevent the public office holder from being in a conflict of interest or an apparent conflict of interest.

5. Le titulaire de charge publique est tenu de gérer ses affaires personnelles de manière à éviter de se trouver en situation de conflit d'intérêts ou en conflit d'intérêts apparent.

SECTION 20—DEFINITIONS CONFLICT OF INTEREST ACT

20.1 The Governor in Council on the recommendation of the Commissioner may, by order, designate any asset or class of assets as an exempt asset under the Act that, in the opinion of the Commissioner, does not constitute any risk of a conflict of interest.

20.1 Le gouverneur en conseil sur recommandation du commissaire peut, par décret, désigner tout bien ou toute catégorie de biens comme étant un bien exclu au sens de la loi qui, de l'avis du commissaire, ne pose aucun risque de conflit d'intérêts.

SECTION 2—DEFINITIONS CONFLICT OF INTEREST ACT

<i>private interest</i> does not include an interest in a decision or matter	<i>intérêt personnel</i> N'est pas visé l'intérêt dans une décision ou une affaire :
(a) that is of general application;	a) de portée générale;
(b) that affects a public office holder <u>or his or her relatives or friends</u> as one of a broad class of persons; or	b) touchant le titulaire de charge publique <u>ou un parent ou un ami</u> faisant partie d'une vaste catégorie de personnes;
(c) that concerns the remuneration or benefits received by virtue of being a public office holder.	c) touchant la rémunération ou les avantages sociaux d'un titulaire de charge publique.

SECTION 15—PROHIBITED ACTIVITIES CONFLICT OF INTEREST ACT

Prohibited activities	Activités interdites
15 (1) No reporting public office holder shall, except as required in the exercise of his or her official powers, duties and functions,	15 (1) À moins que ses fonctions officielles ne l'exigent, il est interdit à tout titulaire de charge publique principal :
(a) engage in employment or the practice of a profession;	a) d'occuper un emploi ou d'exercer une profession;
(b) manage or operate a business or commercial activity;	b) d'administrer ou d'exploiter une entreprise ou une activité commerciale;
(c) continue as, or become, a director or officer in a corporation or an organization;	c) d'occuper ou d'accepter un poste d'administrateur ou de dirigeant dans une société ou un organisme;
(d) hold office in a union or professional association;	d) d'occuper un poste dans un syndicat ou une association professionnelle;

(e) serve as a paid consultant; or

(f) be an active partner in a partnership.

Exception

(1.1) Despite paragraph (1)(a), for the purpose of maintaining his or her employment opportunities or ability to practice his or her profession on leaving public office, a reporting public office holder may engage in employment or the practice of a profession in order to retain any licensing or professional qualifications or standards of technical proficiency necessary for that purpose if

(g) the reporting public office holder does not receive any remuneration; and

(h) the Commissioner is of the opinion that it is not incompatible with the reporting public office holder's duties as a public office holder.

Exception

(2) Despite paragraph (1)(c), a reporting public office holder who is a director or officer in a Crown corporation as defined in section 83 of the Financial Administration Act may continue as, or become, a director or officer in a financial or commercial corporation but only if the Commissioner is of the opinion that it is not incompatible with his or her public duties as a public office holder.

e) d'agir comme consultant rémunéré;

f) d'être un associé actif dans une société de personnes.

Exception

(1.1) Malgré l'alinéa (1)a), afin de préserver ses perspectives d'emploi ou sa capacité d'exercer sa profession une fois qu'il a cessé d'occuper sa charge, le titulaire de charge publique principal peut occuper un emploi ou exercer une profession dans le but de conserver un permis d'exercice, une qualification professionnelle ou un certain niveau de compétence technique qui lui est nécessaire à cette fin si, à la fois :

g) il ne reçoit aucune rémunération;

h) le commissaire estime que cela n'est pas incompatible avec sa charge publique.

Exception : titulaire de charge publique principal

(2) Malgré l'alinéa (1)c), le titulaire de charge publique principal qui occupe un poste d'administrateur ou de dirigeant dans une société d'État au sens de l'article 83 de la Loi sur la gestion des finances publiques peut occuper ou accepter un poste d'administrateur ou de dirigeant dans une société commerciale ou financière si le commissaire estime que ce poste n'est pas incompatible avec sa charge publique.

Exception	Autre exception
<p>(3) Despite paragraph (1)(c), a reporting public office holder may continue as, or become, a director or officer in an organization of a philanthropic, charitable or non-commercial character but only if the Commissioner is of the opinion that it is not incompatible with his or her public duties as a public office holder.</p> <p><u>(3.1) Despite paragraphs (1)(b), (d), (e) and (f), a reporting public office holder may engage in any of those activities if the Commissioner is of the opinion that they are not incompatible with his or her public duties as a public office holder.</u></p>	<p>(3) Malgré l'alinéa (1)c), le titulaire de charge publique principal peut occuper ou accepter un poste d'administrateur ou de dirigeant dans un organisme philanthropique, caritatif ou à but non lucratif si le commissaire estime que ce poste n'est pas incompatible avec sa charge publique.</p> <p><u>(3.1) Malgré les alinéas (1)b), d), e) et f), le titulaire de charge publique principal peut exercer une des activités qui y sont visées si le commissaire estime que l'activité n'est pas incompatible avec sa charge publique.</u></p>
Political activities	Activités politiques
<p>(4) Nothing in this section prohibits or restricts the political activities of a reporting public office holder.</p>	<p>(4) Le présent article n'a pas pour effet d'interdire ou de restreindre les activités politiques d'un titulaire de charge publique principal.</p>

SECTION 52—VIOLATION CONFLICT OF INTEREST ACT

Violation	Violations
<p>52 Every public office holder who contravenes one of the following provisions commits a violation and is liable to an administrative monetary penalty not exceeding <u>\$3,000</u>:</p>	<p>52 Le titulaire de charge publique qui contrevient à l'une des dispositions ci-après de la présente loi commet une violation pour laquelle il s'expose à une pénalité d'au plus <u>3 000 \$</u> :</p>

(i) subsections 22(1), (2) and (5);

i) les paragraphes 22(1), (2) et (5);

(j) section 23;

j) l'article 23;

(k) subsections 24(1) and (2);

k) les paragraphes 24(1) et (2);

(l) subsections 25(1) to (6);

l) les paragraphes 25(1) à (6);

(m) subsections 26(1) and (2); and

m) les paragraphes 26(1) et (2);

(n) subsection 27(7).

n) le paragraphe 27(7).