



Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

Financial Statements

2018
2019

March 31, 2019



Mario Dion

Conflict of Interest and
Ethics Commissioner

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Statement of Management Responsibility Including Internal Control Over Financial Reporting

Responsibility for the integrity and objectivity of the accompanying financial statements for the year ended March 31, 2019 and all information contained in these statements rests with the management of the Office of the Conflict of Interest and Ethics Commissioner (the Office). These financial statements have been prepared by management in accordance with Canadian public sector accounting standards.

Management is responsible for the integrity and objectivity of the information in these financial statements. Some of the information in the financial statements is based on management's best estimates and judgment, and gives due consideration to materiality. To fulfil its accounting and reporting responsibilities, management maintains a set of accounts that provides a centralized record of the Office's financial transactions. Financial information submitted in the preparation of the *Public Accounts of Canada*, and included in the Commissioner's annual reports, is consistent with these financial statements.

Management is also responsible for maintaining an effective system of internal control over financial reporting (ICFR) designed to provide reasonable assurance that financial information is reliable, that assets are safeguarded and that transactions are properly authorized and recorded in accordance with the *Financial Administration Act* and other applicable legislation, regulations, authorities and policies.

Management seeks to ensure the objectivity and integrity of data in its financial statements through careful selection, training, and development of qualified staff; through organizational arrangements that provide appropriate divisions of responsibility; through communication programs aimed at ensuring that regulations, policies, standards, and managerial authorities are understood throughout the Office and through conducting an annual risk-based assessment of the effectiveness of the system of ICFR.

The system of ICFR is designed to mitigate risks to a reasonable level based on an ongoing process to identify key risks, to assess the effectiveness of associated key controls, and to make any necessary adjustments.

A risk-based assessment of the system of ICFR for the year ended March 31, 2019 has been undertaken in accordance with the Treasury Board's *Policy on Internal Controls* and the action plans are summarized in the annex.

At the request of management, Ernst & Young LLP has audited these financial statements and has expressed an audit opinion on the fair presentation of the financial statements of the Office, which does not include an audit opinion on the annual assessment of the effectiveness of the Office's ICFR.



Mario Dion
Conflict of Interest and Ethics Commissioner
Ottawa, Canada
June 20, 2019



Sandy Tremblay
Chief Financial Officer
Ottawa, Canada
June 20, 2019

Independent auditor's report

To the Conflict of **Interest and Ethics Commissioner**

Opinion

We have audited the financial statements of the Office of the **Conflict of Interest and Ethics Commissioner** ["OCIEC"], which comprise the statement of financial position as at March 31, 2019, and the statement of operations and net financial position, the statement of changes in net debt and the statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of OCIEC as at March 31, 2019 and the results of its operations, the change in its net debt and its cash flows for the years then ended in accordance with Canadian public sector accounting standards.

Basis for opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of our report. We are independent of OCIEC in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other Information

Other information consists of the information included in the OCIEC Annual Report dated June 2019 other than the financial statements and our auditor's report referred to thereon. Management is responsible for the other information. Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Canadian public sector accounting standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing OCIEC's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate OCIEC or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing OCIEC's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of OCIEC's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on OCIEC's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause OCIEC to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Ernst & Young LLP

Chartered Professional Accountants
Licensed Public Accountant

Ottawa, Canada
June 20, 2019



Statement of Financial Position

As at March 31

<i>(in dollars)</i>	2019	2018
Liabilities		
Accounts payable and accrued liabilities (<i>note 4</i>)	614,338	776,161
Vacation pay and compensatory leave	188,933	218,281
Employee future benefits (<i>notes 5(b) and 5(c)</i>)	394,934	364,600
<i>Total net liabilities</i>	1,198,205	1,359,042
Financial assets		
Due from Consolidated Revenue Fund	465,562	549,753
Accounts receivable and advances (<i>note 6</i>)	148,776	226,408
<i>Total net financial assets</i>	614,338	776,161
The Office's net debt	583,867	582,881
Non-financial assets		
Prepaid expenses	-	514
Tangible capital assets (<i>note 7</i>)	348,111	465,902
<i>Total non-financial assets</i>	348,111	466,416
The Office's net financial position	235,756	116,465

The accompanying notes form an integral part of these financial statements.



Mario Dion
Conflict of Interest and Ethics Commissioner
Ottawa, Canada
June 20, 2019



Sandy Tremblay
Chief Financial Officer
Ottawa, Canada
June 20, 2019

Statement of Operations and the Office's Net Financial Position

For the Year Ended March 31

	2019 Planned Results	2019	2018
<i>(in dollars)</i>			
Expenses			
Administration of the Act and the Code	5,762,556	5,111,006	4,918,557
Internal Services	1,991,367	2,631,735	2,447,729
Total expenses	7,753,923	7,742,741	7,366,286
Revenues			
Administration of the Act and the Code	-	3,100	2,000
Revenues earned on behalf of the Government	-	(3,100)	(2,000)
Total revenues	-	-	-
Net cost of operations	7,753,923	7,742,741	7,366,286
Government funding and transfers			
Net cash provided by Government of Canada	-	6,597,526	6,305,622
Change in due from the Consolidated Revenue Fund	-	(84,191)	170,195
Services provided without charge by other government departments (<i>note 8(a)</i>)	-	1,110,115	1,148,180
Total government funding and transfers	-	7,623,450	7,623,997
Net cost (surplus) of operations after government funding and transfers	-	119,291	(257,711)
The Office's net financial position – beginning of year	-	116,465	374,176
The Office's net financial position – end of year	-	235,756	116,465

Segmented information (note 9)

The accompanying notes form an integral part of these financial statements.

Statement of Change in the Office's Net Debt

For the Year Ended March 31

<i>(in dollars)</i>	2019	2018
Net cost (surplus) of operations after government funding and transfers	119,291	(257,711)
Change due to tangible capital assets		
Acquisition of tangible capital assets	34,796	315,782
Amortization of tangible capital assets and adjustments	(152,587)	(89,674)
Total change due to tangible capital assets	(117,791)	226,108
Change due to prepaid expenses	(514)	(515)
Net increase (decrease) in the Office's net debt	986	(32,118)
The Office's net debt – beginning of year	582,881	614,999
The Office's net debt – end of year	583,867	582,881

The accompanying notes form an integral part of these financial statements.

Statement of Cash Flows

For the Year Ended March 31

<i>(in dollars)</i>	2019	2018
Operating activities		
Net cost (surplus) of operations before government funding and transfers	7,742,741	7,366,286
Non-cash items:		
Amortization of tangible capital assets and adjustments	(152,587)	(89,674)
Services provided without charge by other Government departments (<i>note 8(a)</i>)	(1,110,115)	(1,148,180)
	6,480,039	6,128,432
Variations in Statement of Financial Position		
Increase (decrease) in accounts receivable and advances	(77,632)	44,210
Decrease in prepaid expenses	(514)	(515)
Decrease (increase) in accounts payable and accrued liabilities	161,823	(214,405)
Decrease in vacation pay and compensatory leave	29,348	28,978
Decrease (increase) in employee benefits	(30,334)	3,140
Cash used in operating activities	6,562,730	5,989,840
Capital activities		
Acquisition of tangible capital assets	34,796	315,782
Cash used in capital activities	34,796	315,782
Net cash provided by Government of Canada	6,597,526	6,305,622

The accompanying notes form an integral part of these financial statements.

Notes to the Financial Statements

For the Year Ended March 31

1. Authority and Objectives

These statements provide the financial information related to all the operations controlled by the Office of the Conflict of Interest and Ethics Commissioner (the Office).

The Office began its operations on July 9, 2007, with the coming into force of the *Conflict of Interest Act*. It replaced the Office of the Ethics Commissioner and was given an expanded mandate.

The objective of the Office is to enhance public confidence and trust in the government and parliamentary institutions, and to assure Canadians that public officials, whether appointed or elected, are held to standards that place the public interest above their private interests. The role of the Office is to administer the *Conflict of Interest Act* (Act) and the *Conflict of Interest Code for Members of the House of Commons* (Code). The Commissioner provides confidential advice to public office holders and Members of Parliament on how to comply with the Act and the Code, respectively. He is also mandated to provide confidential advice to the Prime Minister on conflict of interest and ethics issues. The Commissioner conducts examinations or inquiries into alleged contraventions of the Act or Code. The Office receives and maintains on file confidential reports of assets, liabilities and activities and maintains a public registry of publicly declarable information.

The Office's business is defined through two activities:

Administration of the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*: This encompasses all the activities of the Office, as described above.

Internal Services: This activity supports the business of the Office through internal management services and resources.

Notes to the Financial Statements

For the Year Ended March 31

2. Summary of Significant Accounting Policies

These financial statements have been prepared using the Government of Canada's (the Government) accounting policies stated below, which are based on Canadian public sector accounting standards. The presentation and results using the stated accounting policies do not result in any significant differences from Canadian public sector accounting standards.

Significant accounting policies are as follows:

(a) Parliamentary authorities – The Office is financed by the Government through parliamentary authorities. Financial reporting of authorities provided to the Office does not parallel financial reporting according to Canadian generally accepted accounting principles since authorities are primarily based on cash flow requirements. Consequently, items recognized in the Statement of Operations and the Office's Net Financial Position and in the Statement of Financial Position are not necessarily the same as those provided through authorities from Parliament. Note 3 provides a reconciliation between the bases of reporting. The planned results amounts in the "Expenses" and "Revenues" section of the Statement of Operations and the Office's Net Financial Position and in the Segmented Information (note 9) are based on the amounts in the Office's Main Estimates and have been adjusted to reflect amortization of tangible capital assets, accommodation expense and health and dental benefits expenses, which are not included in the Main Estimates. Planned results are not presented in the "Government funding and transfers" section of the Statement of Operations and the Office's Net Financial Position and in the Statement of Change in the Office's Net Debt because these amounts were not included in the Main Estimates.

(b) Net cash provided by the Government – The Office operates within the Consolidated Revenue Fund (the CRF), which is administered by the Receiver General for Canada. All cash received by the Office is deposited to the CRF, and all cash disbursements made by the Office are paid from the CRF. The net cash provided from the CRF is the difference between all cash receipts and all cash disbursements including transactions between departments of the Government.

(c) Amounts Due from the Consolidated Revenue Fund – Amounts due from the CRF are the result of timing differences at year-end between when a transaction affects authorities and when it is processed through the CRF. Amounts due from the CRF represent the net amount of cash that the Office is entitled to draw from the CRF without further appropriations to discharge its liabilities.

(d) Revenues – Revenues are accounted for in the period in which the underlying transaction or event that gave rise to the revenues takes place.

Revenues that are non-respendable are not available to discharge the Office's liabilities. While the Commissioner is expected to maintain accounting control, he has no authority regarding the disposition of non-respendable revenues. As a result, non-respendable revenues are considered to be earned on behalf of the Government and are therefore presented in reduction of the Office's gross revenues.

Notes to the Financial Statements

For the Year Ended March 31

2. Summary of Significant Accounting Policies (continued)

(e) Expenses – Expenses are recorded on the accrual basis:

- i. Vacation pay and compensatory leave are accrued as the benefits are earned by employees under their respective terms of employment.
- ii. Services provided without charge by other government departments for accommodation and the employer's contribution to the health and dental insurance plans are recorded as operating expenses at their estimated cost.

(f) Employee future benefits

- i. Pension benefits: Eligible employees participate in the Public Service Pension Plan (the Plan), a multi-employer pension plan administered by the Government. The Office's contributions to the Plan are charged to expenses in the year incurred and represent the total obligation of the Office to the Plan. The Office's responsibility with regard to the Plan is limited to its contributions. Actuarial surpluses or deficiencies are recognized in the financial statements of the Government of Canada, as the Plan's sponsor.
- ii. Severance benefits: Employees entitled to severance benefits under conditions of employment earn these benefits as services necessary to earn them are rendered. The obligation relating to the benefits earned by employees is calculated using information derived from the actual remaining liability for employee severance benefits for the Office as a whole.
- iii. Sick leave: Employees are permitted to accumulate sick leave until termination of employment, which they can only use in the event of an illness. Accumulated unused sick leave upon employee termination is not payable to the employee and may not be used as vacation. All sick leave is an accumulating non-vesting benefit. A liability is recorded for sick leave balances expected to be taken in excess of future allotments. The costs of sick leave as well as the present value of the obligation is determined using an actuarial valuation. Any gains or losses are recognized in net results in the period in which they arise.

(g) Accounts receivable and advances – Accounts receivable and advances are stated at the lower of cost and net recoverable value; a valuation allowance is recorded for receivables where recovery is considered uncertain.

(h) Foreign currency transactions – Transactions involving foreign currencies are translated into Canadian dollar equivalents using rates of exchange in effect at the time of those transactions. Monetary assets and liabilities denominated in a foreign currency are translated into Canadian dollars using the rate of exchange in effect at year-end.

Notes to the Financial Statements

For the Year Ended March 31

2. Summary of Significant Accounting Policies (continued)

(i) **Tangible capital assets** – All tangible capital assets and leasehold improvements having an initial cost of \$2,500 or more are recorded at their acquisition cost.

Amortization of tangible capital assets is done on a straight-line basis over the estimated useful life of each asset as follows:

Asset class	Amortization period
Machinery and equipment	10 years
Other equipment	10 years
Computer equipment	3 - 10 years
Computer software	3 years
Leasehold improvements	over the lease term

(j) **Measurement uncertainty** – The preparation of these financial statements requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, revenues and expenses reported in the financial statements. At the time of preparation of these statements, management believes the estimates and assumptions to be reasonable. The most significant items where estimates are used are the liability for employee severance benefits, the liability of employee sick leave benefits, and the useful life of tangible capital assets. Actual results could significantly differ from those estimated. Management's estimates are reviewed periodically and, as adjustments become necessary, they are recorded in the financial statements in the year they become known.

Notes to the Financial Statements

For the Year Ended March 31

3. Parliamentary authorities

The Office receives most of its funding through annual parliamentary authorities. Items recognized in the Statement of Operations and the Office's Net Financial Position and the Statement of Financial Position in one year may be funded through Parliamentary authorities in prior, current or future years. Accordingly, the Office has different net results of operations for the year on a government funding basis than on an accrual accounting basis. The differences are reconciled in the following tables:

(a) Reconciliation of net cost of operations to current year authorities used

<i>(in dollars)</i>	2019	2018
Net cost of operations before government funding and transfers	7,742,741	7,366,286
<i>Adjustments for items affecting net cost of operations, but not affecting authorities:</i>		
Amortization of tangible capital assets and adjustments	(152,587)	(89,674)
Services provided without charge by other government departments	(1,110,115)	(1,148,180)
Decrease in vacation pay and compensatory leave	29,348	28,978
Decrease (increase) in employee future benefits	(30,334)	3,140
Refund of prior years' expenditures	21,423	81,315
Total items affecting net cost of operations, but not affecting authorities	(1,242,265)	(1,241,421)
<i>Adjustments for items not affecting net cost of operations, but affecting authorities:</i>		
Acquisition of tangible capital assets	34,796	315,782
Loans issued on behalf of Government	(16,994)	81,289
Decrease in prepaid expenses	(514)	(515)
Total items not affecting net cost of operations, but affecting authorities	17,288	396,556
Current year authorities used	6,517,764	6,638,421

Notes to the Financial Statements

For the Year Ended March 31

3. Parliamentary authorities (continued)

(b) *Authorities provided and used*

<i>(in dollars)</i>	2019	2018
Authorities provided:		
Vote 15 – Operating expenditures	6,134,141	6,178,280
Statutory amounts	690,883	665,257
Less:		
Lapsed: Operating	(307,260)	(205,116)
Current year authorities used	6,517,764	6,638,421

4. Accounts payable and accrued liabilities

The following table presents details of the Office's accounts payable and accrued liabilities:

<i>(in dollars)</i>	2019	2018
Accounts payable – Other government departments and agencies	5,689	242,528
Accounts payable – External parties	79,434	86,978
Total accounts payable	85,123	329,506
Accrued liabilities	529,215	446,655
Total accounts payable and accrued liabilities	614,338	776,161

Notes to the Financial Statements

For the Year Ended March 31

5. Employee Future Benefits

(a) Pension Benefits

The Office's employees participate in the Plan, which is sponsored and administered by the Government. Pension benefits accrue up to a maximum period of 35 years at a rate of 2% per year of pensionable service, times the average of the best five consecutive years of earnings. The benefits are integrated with Canada/Québec Pension Plan benefits and they are indexed to inflation.

Both the employees and the Office contribute to the cost of the Plan. Due to the amendment of the Public Service Superannuation Act following the implementation of provisions related to Economic Action Plan 2012, employee contributors have been divided into two groups. Group 1 relates to existing plan members as of December 31, 2012 and Group 2 relates to members joining the Plan as of January 1, 2013. Each group has a distinct contribution rate.

The 2018-2019 expense amounts to \$481,822 (\$453,040 in 2017-2018). For Group 1 members, the expense represents approximately 1.01 times (1.01 times in 2017-2018) the employee contributions and, for Group 2 members, approximately 1.00 times (1.00 times in 2017-2018) the employee contributions.

The Office's responsibility with regard to the Plan is limited to its contributions. Actuarial surpluses or deficiencies are recognized in the financial statements of the Government of Canada, as the Plan's sponsor.

(b) Severance benefits

The Office provides severance benefits to its employees based on eligibility, years of service and salary at termination of employment. These severance benefits are not pre-funded. Benefits will be paid from future authorities. Information about the severance benefits, measured as at March 31, is as follows:

<i>(in dollars)</i>	2019	2018
Accrued severance benefit obligation – beginning of year	69,600	68,740
Expense for the year	25,431	26,394
Benefits paid during the year	(14,097)	(25,534)
Accrued severance benefit obligation – end of year	80,934	69,600

As a result of changes to conditions of employment for all employees of the Office, the accumulation of severance benefits under the employee severance pay program ceased in 2012. Employees subject to these changes have been given the option to be immediately paid the full or partial value of benefits earned to date or collect the full or remaining value of benefits on termination from the public service. These changes have been reflected in the calculation of the outstanding severance benefit obligation.

Notes to the Financial Statements

For the Year Ended March 31

5. Employee Future Benefits (continued)

(c) Sick leave benefits

The Office provides benefits for sick leave to its eligible employees consisting of one and one-quarter days of sick leave per calendar month. Sick leave can only be used for paid time off at the employee's normal rate of pay when the employee is unable to perform their duties because of illness or injury. Unused sick leave benefits accumulate during the employee's period of service and no payment is due to employees upon termination of employment for unused days. Information about the sick leave benefits, measured as at March 31, is as follows:

<i>(in dollars)</i>	2019	2018
Accrued sick leave benefit obligation – beginning of year	295,000	299,000
Expense for the year:		
Current period benefit cost	38,000	38,000
Interest accrued	6,000	5,000
Actuarial gain (loss)	12,000	(11,000)
Benefits paid during the year	(37,000)	(36,000)
Accrued sick leave benefit obligation – end of year	314,000	295,000

At the end of fiscal year 2019, an actuarial valuation of the Office's accrued sick leave benefit obligation was completed using the projected benefit method prorated on services. The significant actuarial assumptions adopted in measuring the accrued sick leave benefit obligation are as follows:

	2019	2018
Discount rate	1.70%	2.10%
Rate of compensation increase per year:		
2019	2.0%	2.0%
2020 and thereafter	2.0%	2.0%
Average remaining service period of active employees	14.3 years	14.3 years

Notes to the Financial Statements

For the Year Ended March 31

6. Accounts Receivable and Advances

The following table presents details of the Office's accounts receivable and advances balances:

<i>(in dollars)</i>	2019	2018
Receivables – Other government departments and agencies	69,876	130,513
Receivables – External	-	-
Employee advances	78,900	95,895
Net accounts receivable and advances	148,776	226,408

Notes to the Financial Statements

for the Year Ended March 31

7. Tangible Capital Assets

(in dollars)

(in dollars)	Cost					Accumulated amortization				Net book value	
	Opening balance	Acqui-sitions	Disposals and write-offs	Transfers of assets under development	Closing balance	Opening balance	Amorti-zation	Disposals, write-offs and adjustments	Closing balance	2019	2018
Machinery and equipment	31,869	-	-	-	31,869	13,500	1,837	-	15,337	16,532	18,369
Other equipment	619,016	5,805	-	-	624,821	568,929	29,878	-	598,807	26,014	50,087
Computer equipment	223,096	22,020	-	-	245,116	170,848	5,806	-	176,654	68,462	52,248
Computer software	602,001	-	-	345,198	947,199	602,001	115,066	-	717,067	230,132	-
Leasehold improvements	120,523	-	-	-	120,523	120,523	-	-	120,523	-	-
Assets under development	345,198	6,971	-	(345,198)	6,971	-	-	-	-	6,971	345,198
	1,941,703	34,796	-	-	1,976,499	1,475,801	152,587	-	1,628,388	348,111	465,902

Notes to the Financial Statements

for the Year Ended March 31

8. Related Party Transactions

The Office is related, as a result of common ownership, to all Government departments, agencies, and Crown corporations. The Office enters into transactions with these entities in the normal course of business and on normal trade terms. In addition, the Office has agreements with the House of Commons related to the provision of information technology and security services, and Public Service and Procurement Canada related to the provision of compensation services. During the year, the Office received common services that were provided without charge from other Government departments as presented in part (a) below.

(a) Common services provided without charge by other government departments

During the year, the Office received services without charge from certain common service organizations related to accommodation and the employer's contribution to the health and dental insurance plans. These services provided without charge have been recognized in the Statement of Operations and the Office's Net Financial Position as follows:

<i>(in dollars)</i>	2019	2018
Accommodation	732,755	747,756
Employer's contribution to health and dental insurance plan	377,360	400,424
Total	1,110,115	1,148,180

The Government has centralized some of its administrative activities for efficiency, cost-effectiveness purposes and economic delivery of programs to the public. As a result, the Government uses central agencies and common service organizations so that one department performs services for all other departments and agencies without charge. The costs of these services, such as the payroll, cheque issuance and translation services provided by Public Service and Procurement Canada (PSPC), are not included in the Statement of Operations and the Office's Net Financial Position. In addition, the costs of maintenance, identity cards, transportation and messenger services provided by the House of Commons are also not included in the Statement of Operations and the Office's Net Financial Position.

Notes to the Financial Statements

for the Year Ended March 31

8. Related Party Transactions (continued)

(b) Other transactions with related parties

<i>(in dollars)</i>	2019	2018
Accounts receivable – Other government departments and agencies	69,876	130,513
Accounts payable – Other government departments and agencies	5,689	242,528
Expenses – Other government departments and agencies	1,386,262	1,600,290

Expenses disclosed in note 8(b) exclude common services provided without charge, which are already disclosed in note 8(a).

Notes to the Financial Statements

For the Year Ended March 31

9. Segmented information

Presentation by segment is based on the Office's program activity structure. The presentation by segment is based on the same accounting policies as described in the summary of significant accounting policies in note 2. The following table presents the expenses incurred and revenues generated for the main program activities, by major object of expense and by major type of revenue. The segment results for the period are as follows:

	2019				2018
	Planned Results	Administration of the Act and the Code	Internal Services	Total	Total
<i>(in dollars)</i>					
Expenses					
Salaries and employee benefits	5,561,298	4,267,980	1,567,694	5,835,674	5,683,823
Professional and special services	983,525	110,044	701,373	811,417	595,740
Accommodation	733,000	527,584	205,171	732,755	747,756
Amortization of tangible capital assets and adjustments	153,000	109,863	42,724	152,587	89,674
Rental	82,900	777	7,534	8,311	60,962
Repairs and maintenance	6,800	1,078	7,104	8,182	6,100
Materials and supplies	89,000	46,698	77,769	124,467	132,147
Communications, travel and relocation	60,900	43,565	17,362	60,927	48,424
Information	83,500	3,417	5,004	8,421	1,660
Total expenses	7,753,923	5,111,006	2,631,735	7,742,741	7,366,286
Revenues					
Administrative monetary penalties	-	3,100	-	3,100	2,000
Revenues earned on behalf of the Government	-	(3,100)	-	(3,100)	(2,000)
Total revenues	-	-	-	-	-
Net cost from continuing operations	7,753,923	5,111,006	2,631,735	7,742,741	7,366,286

***Annex to the Statement of Management Responsibility
Including Internal Control Over Financial Reporting***

**Summary of the assessment of effectiveness of the systems
of internal control over financial reporting and action plan of
the Office of the Conflict of Interest and Ethics Commissioner
for fiscal year 2018-2019**

Preface

The management of the Office of the Conflict of Interest and Ethics Commissioner (the “Office”) is responsible for maintaining an effective system of internal control over financial reporting (“ICFR”).

Management has decided to conduct an annual assessment of its system of ICFR, establish an action plan to address any necessary adjustments, and attach to the *Statement of Management Responsibility* a summary of the assessment results and action plan.

An effective system of ICFR aims to achieve reliable financial statements and to provide assurances that:

- transactions are appropriately authorized;
- financial records are properly maintained;
- assets are safeguarded from risks such as waste, abuse, loss, fraud and mismanagement; and
- applicable laws, regulations and policies are followed.

It is important to note that the system of ICFR is not designed to eliminate all risks, but rather to mitigate risks to a reasonable level with controls that are balanced with and proportionate to the risks they aim to mitigate.

The maintenance of an effective system of ICFR is an ongoing process designed to identify key risks, assess effectiveness and adjust, as required, associated key controls, as well as to monitor system performance in support of continuous improvement.

1. Introduction

This document is attached to the Office's *Statement of Management Responsibility Including Internal Control over Financial Reporting* for the fiscal year 2018-2019.

This document provides summary information on the measures taken by the Office to maintain an effective system of internal control over financial reporting (ICFR). In particular, it provides summary information on the assessments conducted by the Office as at March 31, 2019, including progress, results and related action plans along with financial highlights pertinent to understanding the control environment unique to the Office. This is the seventh year of publication for this annex.

1.1 Authority, Mandate and Program Activities

Detailed information on the Office's authority, mandate and program activities can be found in the Commissioner's [Annual Report in respect of the Conflict of Interest Act](#) and the Commissioner's [Annual Report in respect of the Conflict of Interest Code for Members of the House of Commons](#).

Financial highlights

Below is key financial information for fiscal year 2018-2019. More information can be found in the Office's audited Financial Statements and Notes to the Financial Statements.

- Total expenses were \$7,742,741, 75% of which is salary;
- Total revenues of \$3,100 (Administrative monetary penalties) were earned on behalf of the Government;
- Total financial and non-financial assets and liabilities were \$962,449 and \$1,198,205 respectively. Tangible capital assets comprise 36% of the Office's total assets. Accounts payable and accrued liabilities comprise 51% of total liabilities; and
- The Office has a number of information systems that are critical to its operations and financial reporting.

1.2 Audited financial statements

Financial statements of the Office are audited since 2010-2011. The Office has always received an unqualified audit opinion, including for fiscal year 2018-2019.

1.3 Service arrangements relevant to financial statements

The Office relies on other organizations for the processing of certain transactions that are recorded in its financial statements.

- Treasury Board Secretariat provides the Office with information used to calculate various accruals and allowances;
- Under a Memorandum of Understanding, the House of Commons provides system development and maintenance support service for information systems used in financial reporting and also delivers security monitoring services.

1.4 Accounting changes in fiscal-year 2018-2019

The Office reviewed its approach for the evaluation, accounting and reporting of accumulated sick leave entitlements. In fiscal 2016-2017, a full actuarial valuation was performed to measure the accumulated sick leave entitlements that are anticipated to be used in future years. In 2018-2019, an actuarial valuation of the Office's accrued sick leave benefit obligation was completed using the projected method prorated on services.

2. Office's control environment relevant to ICFR

The Office recognizes the importance of setting the tone from the top to help ensure that employees at all levels understand their roles in maintaining effective systems of ICFR and are well equipped to exercise these responsibilities effectively. The Office's focus is to ensure risks are managed well through a responsive and risk-based control environment that enables continuous improvement and innovation. Key components of entity level controls at the Office aim at ensuring solid governance and effective risk management at the corporate level, as well as the maintenance of other entity level controls to provide effective support to employees by raising awareness and providing appropriate knowledge, skills and tools.

2.1 Key positions, roles and responsibilities

Below are the Office's key positions and committees with responsibilities for maintaining and reviewing the effectiveness of its system of ICFR.

Commissioner – The Conflict of Interest and Ethics Commissioner as Deputy Head and Accounting Officer, assumes overall responsibility and leadership for the measures taken to maintain an effective system of internal control. In this role, the Commissioner chairs the Senior Management Committee.

Chief Financial Officer (CFO) – The Office's CFO reports directly to the Commissioner and provides leadership for the coordination, coherence and focus on the design and maintenance of an effective and integrated system of ICFR, including its annual assessment.

Directors – The Office's directors in charge of program delivery are responsible for maintaining and reviewing the effectiveness of the system of ICFR falling within their mandate.

Senior Management Committee (SMC) - As the Office's central decision-making body, the SMC reviews, approves and monitors the Corporate Risks Profile and the Office's system of internal control, including the assessment and action plan relating to the system of ICFR.

2.2 Key measures taken by the Office

The Office's control environment also includes a series of measures to equip its employees to manage risks through raising awareness and providing appropriate knowledge and tools, as well as developing skills. Key measures include:

- The establishment of a Code of values and standards of conduct. Employees must familiarize themselves with the content of the Code and sign the Employee Acknowledgement Form when they are first appointed to the Office, and then on an annual basis during their performance review;
- Annual performance agreements which clearly set out financial management responsibilities for all executives;
- Information sessions in core areas of financial management;
- Policies and guidelines tailored to the Office's control environment;
- Valid delegation of financial signing authorities instrument; and
- Documentation of the Office's main business processes and related key risks and control points to support the management and oversight of its system of ICFR.

3. Assessment of the Office's system of ICFR

3.1 Assessment baseline

Financial Statements of the Office for the fiscal year 2018-2019 have been audited by Ernst & Young. In parallel, senior management has been providing increased focus on formalizing its approach to the management and on-going maintenance of its systems of ICFR with the objective of supporting continuous improvement.

In 2011-2012, the Office implemented a more systematic risk-based multi-year assessment plan of the design and operating effectiveness of its systems of ICFR.

Whether it is to support the control-based audit requirements or those of the *Policy on Internal Control*, an effective system of ICFR has the objective to provide reasonable assurance that:

- transactions are appropriately authorized;
- data and financial information are accurate and consistent;
- financial records are properly maintained;
- assets are safeguarded; and
- applicable laws, regulations and policies are followed.

Over time, this includes the assessment of the design and operating effectiveness of the system of ICFR, and by doing so, ensuring the on-going monitoring and continuous improvement of the Office's system of ICFR.

Design effectiveness means ensuring that key control points are identified, documented and implemented, that they are aligned with the risks (i.e. controls are balanced with and proportionate to the risks they aim to mitigate) and that any remediation required is actioned. This includes the mapping of key processes and IT systems to the main accounts by location as applicable.

Operating effectiveness means that the application of key controls has been tested over a defined period and that any required remediation is actioned.

The assessment covers all Office control levels, including corporate or entity, general computer and business process controls.

On-going monitoring means that a systematic integrated approach to monitoring is in place, including periodic risk-based assessment and timely remediation.

3.2 Assessment method at the Office

The self-assessment at the Office is a systematic review conducted to provide assurance on internal control over financial reporting.

In 2011-2012, a scoping and planning exercise was undertaken to identify key business processes and sub-processes. During this exercise, both quantitative and qualitative factors were considered. Materiality levels for financial statement accounts and for significant business units or processes were established. Other risk areas, such as susceptibility of loss due to errors or fraud, nature of account, etc. that could have an impact on the internal controls over financial reporting were also identified. Financial statement assertions and control categories were documented.

In 2012-2013, the Office assessed the design effectiveness of the key controls in the areas of:

- Compensation;
- Goods and services;
- Planning, budgeting and forecasting;
- Financial statements and Public Accounts; and
- Financial system security accesses.

In 2013-2014, the Office assessed the design effectiveness of the Administrative Monetary Penalty process. Furthermore, the assessment of the operating effectiveness of the key controls was completed in the areas of:

- Compensation;
- Goods and services;
- Administrative monetary penalties;
- Planning, budgeting and forecasting;
- Financial statements and Public Accounts; and
- Financial system security accesses.

During 2014-2015, the Office completed the following activities for its entity-level controls and its IT general and application controls:

- Developed two questionnaires to identify and assess the entity-level controls and the IT general and application controls;
- Identified necessary remediation plans to address gaps or issues of design and operating effectiveness; and
- Reported the results of the assessment and made recommendations to address gaps and issues identified.

In 2015-2016, the Office updated several of its assessment reports and related procedures in the areas of:

- Entity controls;
- IT controls;
- Test of operating effectiveness; and
- Monitoring assessments.

In 2016-2017, following the transfer of compensation and financial services internally, the Office completed the following:

- Update of our processes;
- Update of our workflows; and
- Risk evaluation and mitigation exercise.

In 2017-2018, the implementation of a new financial system was under development to go live on April 1, 2018. Therefore, the Office completed the following:

- Review of our processes;
- Design of a new chart of accounts structure;
- Assessment of IT controls;
- Planning of a new Internal Controls assessment.

In 2018-2019, the Office of the Commissioner completed its first fiscal year with the new financial system, which involved the following exercises:

- Introduction of a new chart of accounts;
- Implementation of new processes;
- Adoption of new internal controls.

4. Assessment results as of March 31, 2019

During the 2018-2019 fiscal year, the Office reviewed its processes and ensured that risks were mitigated following the internal corporate changes.

None of the deficiencies identified were serious enough to significantly weaken internal controls over financial reporting.

5. Office's action plan

Building on progress to date, the Office has developed a plan to evaluate its system of ICFR. The Office is on track to implement a continuous monitoring process in 2019-2020. The following action plan highlights the progress made by the Office of the Commissioner to ensure that an effective ICFR system is in place.

	Completed	2019-2020
<u>Scoping and Planning</u>	✓	✓
Process Controls	Completed	2019-2020
<u>Documentation and identification of controls</u>		
Compensation		✓
Goods and services		✓
Administrative monetary penalties		✓
Planning, budgeting and forecasting		✓
Preparation of financial statements		✓
Preparation of Public Accounts		✓
Financial systems access security		✓
<u>Test of Design</u>		
Compensation		✓
Goods and services		✓
Administrative monetary penalties		✓
Planning, budgeting and forecasting		✓
Preparation of financial statements		✓
Preparation of Public Accounts		✓
Financial systems access security		✓
<u>Test of Operating effectiveness</u>		
Compensation		✓
Goods and services		✓
Administrative monetary penalties		✓
Planning, budgeting and forecasting		✓
Preparation of financial statements		✓
Preparation of Public Accounts		✓
Financial systems access security		✓

IT General and Application Controls	Completed	2019-2020
Documentation and identification of controls		✓
Test of design		✓
Test of operating effectiveness		✓
Entity Level Controls	Completed	2019-2020
Documentation and identification of controls		✓
Test of design		✓
Test of operating effectiveness		✓
Monitoring	Completed	2019-2020
On-going monitoring	✓	✓