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2025 ANNUAL REPORT OF THE INTEGRITY COMMISSIONER

THE CORPORATION OF THE MUNICIPALITY OF LEAMINGTON

John George Pappas
Aird & Berlis LLP

July 7, 2026

INTRODUCTION

Aird & Berlis LLP is the appointed Integrity Commissioner for the Municipality of Leamington (the “**Municipality**”) pursuant to subsection 223.3(1) of the *Municipal Act, 2001*. Our firm was originally appointed on March 1, 2025 for a two (2) year term.

This is the first annual report that we have prepared, encompassing the period from March 1, 2025 to December 31, 2025 (the “**Reporting Period**”).

This annual report provides a brief executive summary of activities undertaken in carrying our responsibilities as the Integrity Commissioner of the Municipality.

ROLE OF INTEGRITY COMMISSIONER

The functions of an Integrity Commissioner are set out in subsection 223.3(1) of the *Municipal Act, 2001* and have all been assigned to Aird & Berlis LLP by Council. Our functions include responsibilities relating to inquiry, investigation, advice and education.

COMPLAINTS / APPLICATIONS

Integrity Commissioners are empowered to investigate alleged contraventions respecting a municipality’s code of conduct and any other procedures, rules and policies relating to the ethical behaviour of members of a municipal council or its local boards. There were no formal or informal complaints against any members of Council or of the Municipality’s local boards during the Reporting Period.

An Integrity Commissioner may also conduct inquiries under the *Municipal Conflict of Interest Act* to determine whether a member has acted in the contravention of the statute. There were also no applications filed during the Reporting Period under section 223.4.1 of the *Municipal Act, 2001* that required investigation by our office.

ADVICE

Integrity Commissioner are expressly authorized to provide specific and particularized written advice to members with respect to their obligations under the code of conduct, other ethical policies, rules or procedures and/or the *Municipal Conflict of Interest Act*. Such advice is provided confidentially but may be disclosed by the member and, in limited circumstances by the Integrity Commissioner.

During the Reporting Period, we received one (1) request for written advice from a member of Council regarding a potential indirect pecuniary interest under the *Municipal Conflict of Interest Act*.

EDUCATION & TRAINING

We did not present any education session to Council during the Reporting Period. We are recommending a comprehensive training session for all members following the municipal election, ideally in the first quarter of 2027.

UPDATES TO MUNICIPAL ACCOUNTABILITY FRAMEWORK

On May 1, 2025, the provincial government announced Bill 9, the *Municipal Accountability Act, 2026*, re-introducing the legislation originally proposed under Bill 241, which would impose new requirements for provincial-wide uniform codes of conduct; mandatory education and training for Integrity Commissioners and for members of council and local boards; for the involvement of the Integrity Commissioner of Ontario; and for the removal from office and disqualification of members of council for egregious contraventions of a code of conduct, which result in harm to the health, safety or well-being of any person.

Bill 9 made its way through the Committee stage in 2025 without substantial amendments. The Bill was given Third Reading on May 26, 2026, passing by a vote of 110 to 1. Although Bill 9 received Royal Assent on June 2, 2026, its substantive changes are not yet in force. Bill 9's amendments to Part V.1 of the *Municipal Act, 2001* will come into effect on a day to be proclaimed by the Lieutenant Governor in Council. No such date has been fixed as of yet.

Many of Bill 9's most impactful changes to the municipal accountability framework will come through regulations, which have not yet been released. This includes a uniform code of conduct, which will supersede any current, locally-adopted code, including the Municipality's code of conduct.

CLOSING REMARKS

We commend all members of Council for complying with their accountability and ethical obligations.

We will continue to closely monitor the implementation of Bill 9 and related regulations, and will report on any materials impacts to our role as Integrity Commissioner.

We look forward to the opportunity to continue to be of service to Council and to Municipal staff as Integrity Commissioner throughout 2026.

Respectfully submitted,

AIRD & BERLIS LLP



John George Pappas