



**ADR**  
CHAMBERS

**Integrity Commissioner Office**  
for the Township of Wilmot

**BENJAMIN M. DRORY**  
Integrity Commissioner  
Township of Wilmot  
E-mail: [integrity@adr.ca](mailto:integrity@adr.ca)

March 20, 2025

Sent via Email:

**Kaitlin Bos**  
Township Clerk  
Township of Wilmot  
[kaitlin.bos@wilmot.ca](mailto:kaitlin.bos@wilmot.ca)

**Re: IC-35481-0325: Township of Wilmot- Integrity Commissioner  
Annual Report – Operating Period December 15, 2023 – December 14, 2024**

---

Dear Ms. Bos,

Our firm has operated as the Integrity Commissioner for the Township of Wilmot (the “Township”) since December 15, 2023. In accordance with the terms of the agreement with the Township, and pursuant to section 223.6(1) of the *Municipal Act, 2001*, we are providing our annual report for the operating period of December 15, 2023 to December 14, 2024.

As you know, the Integrity Commissioner’s role is to help Members of Council (“Members”) ensure that they are performing their functions in accordance with the Township’s Code of Conduct (the “Code”) and the *Municipal Conflict of Interest Act* (the “MCIA”). Upon request, I am available to educate and provide advice to Members on matters governing their ethical behaviour and compliance with those requirements. My office and I are also responsible for assessing and investigating complaints received respecting alleged breaches of the Code or the MCIA.

**Requests for Advice and Information**

I received and responded to seven formal requests for advice during this operating period, from Members of Council and Local Boards entitled to request such pursuant to section 223.3(1)4 of the *Municipal Act, 2001*.

I also received and responded to one request for educational information about the municipality’s codes of conduct from a member of the public, pursuant to section 223.3(1)7 of the *Municipal Act, 2001*.

**Code/MCIA Complaints**

During this operating period, I received one formal Code of Conduct complaint. However, that complaint was found not to warrant an investigation, and was dismissed accordingly.

**Educational Information and Training Sessions**

On April 25, 2024, I presented an education session to Council and the Township’s Committees about the Code of Conduct and the role of the Integrity Commissioner.

**Code of Conduct Review**

Upon request, I completed a partial review of the Township’s Code of Conduct in March 2024, although to my knowledge no formal changes were ultimately made to the Code. I understand the Township’s Code of Conduct has been in place since 2007.<sup>1</sup>

I note that in December 2024,<sup>2</sup> the provincial government indicated an intention to implement a province-wide municipal Code of Conduct and Complaint Protocol, expected to be effective fall 2026. Accordingly, as a result of that announcement I believe there would be minimal benefit in making any updates to the Township’s Code of Conduct and Complaint Protocol going forward, unless any provision becomes identified as carrying material negative impact in the interim.

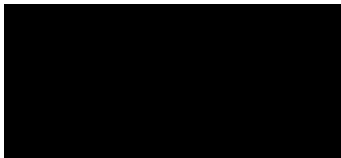
**Billing**

In accordance with our agreement with the Township, the billing for the December 15, 2023 to December 14, 2024 operating period totaled \$13,458.30.

**Final Comments**

Our staff and I look forward to continuing to assist the Township and its Members address issues that may arise connected to the Code and MCIA in the coming year.

Yours very truly,



\_\_\_\_\_  
Benjamin M. Drory  
Office of the Integrity Commissioner, Township of Wilmot

<sup>1</sup> Code of Conduct for Elected Officials – <https://www.wilmot.ca/en/township-office/resources/Documents/Code-of-Conduct--Council.pdf>

<sup>2</sup> “Ontario Supporting Stronger Local Governance” (Ministry of Municipal Affairs and Housing, December 12, 2024) <https://news.ontario.ca/en/backgrounder/1005483/ontario-supporting-stronger-local-governance>