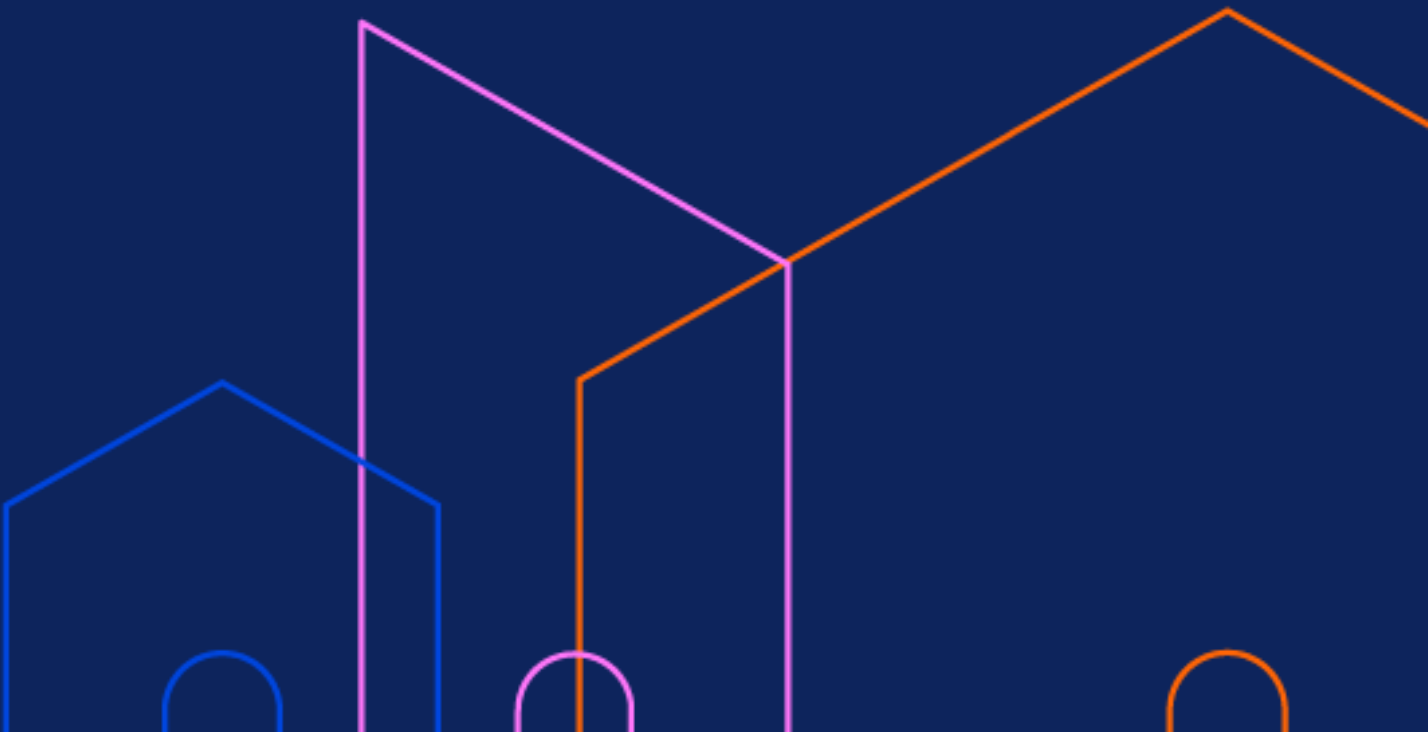


# 2025 Annual Whistleblowing Program Report

**mpac** Municipal Property  
Assessment Corporation™



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## About MPAC's Whistleblowing Program

MPAC is committed to upholding the highest standards of integrity, transparency, and ethical behaviour across all areas of its operations.

The Whistleblowing Program continues to play an essential role in enabling employees and members of the public to report suspected fraud, misconduct, or other irregularities in a secure and confidential manner. In accordance with MPAC's Fraud and Other Irregularities Policy, employees are required to report any known or suspected incidents of fraud or irregular conduct.

The Whistleblowing Program is administered by MPAC's Risk Management branch, which reports directly to MPAC's Board of Directors, ensuring appropriate oversight, independence, and accountability.

This report outlines the Whistleblowing Program's processes, reporting activity, investigation outcomes, and key trends for 2025. .

## How to report a concern

MPAC's Whistleblowing Program offers multiple secure channels for submitting disclosures (reports of suspected fraud, misconduct, or other irregularities). Individuals can report concerns anonymously and in confidence using MPAC's independent third-party service. For instructions on how to submit a report by telephone, online, or by mail, please visit <https://www.mpac.ca/en/AboutUs/WhistleblowingProgram>

## How MPAC addresses disclosures

The Whistleblowing Program is overseen by MPAC's Risk Management branch and supported by an independent third-party service.

All disclosures received are reviewed to determine whether they fall within the scope of the Whistleblowing Program and warrant further investigation. Disclosures that fall outside of the program's scope are redirected to the appropriate internal or external process for resolution.

Information collected through the Whistleblowing Program is protected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. MPAC maintains a strict non-retaliation stance, and any form of retaliation against individuals who report

concerns or participate in investigations is expressly prohibited under MPAC's Fraud and Other Irregularities Policy.

## Program activity in 2025

Since the establishment of the Whistleblowing Program in 2016, MPAC has received a total of 154 reports. In 2025, the program saw a notable increase in reporting activity, with 26 disclosures received—an increase from the 10 disclosures received in 2024. Despite this rise, disclosure levels in 2025 are consistent with those seen prior to the pandemic. This increase in reporting is also attributed to enhanced awareness and communication of the program, as well as sustained confidence in MPAC's commitment to ethical conduct and protection from retaliation. Not all disclosures result in findings of wrongdoing, and reporting volumes should not be interpreted as an indication of the prevalence of misconduct within the organization.

Of the reports received in 2025:

- 20 reports were submitted by external sources, and 6 by MPAC employees.
- 7 disclosures were determined to be outside the scope of the program and referred to other channels.
- 19 cases proceeded to investigation as potential instances of fraud or other irregularities.
- 17 investigations were completed within the year, with 2 ongoing at year-end.

The categorization of investigated reports is summarized below:

Category	Number of reports	% of total reports
<b>Violation of Laws, Regulations, Policies, or Procedures</b>	1	6%
<b>Unethical Conduct</b>	2	11.5%
<b>Property Assessment/Valuation Misinformation or Fraud</b>	10	59%
<b>Management/Supervisor</b>	1	6%
<b>Data Security and Privacy</b>	2	11.5%
<b>Conflict of Interest</b>	1	6%

## Investigation outcomes

Since the inception of the Whistleblowing Program, 132 reports have proceeded to an investigation. MPAC reviews all reports to determine the appropriate course of action, and investigations are conducted in a timely manner based on the complexity of each issue.

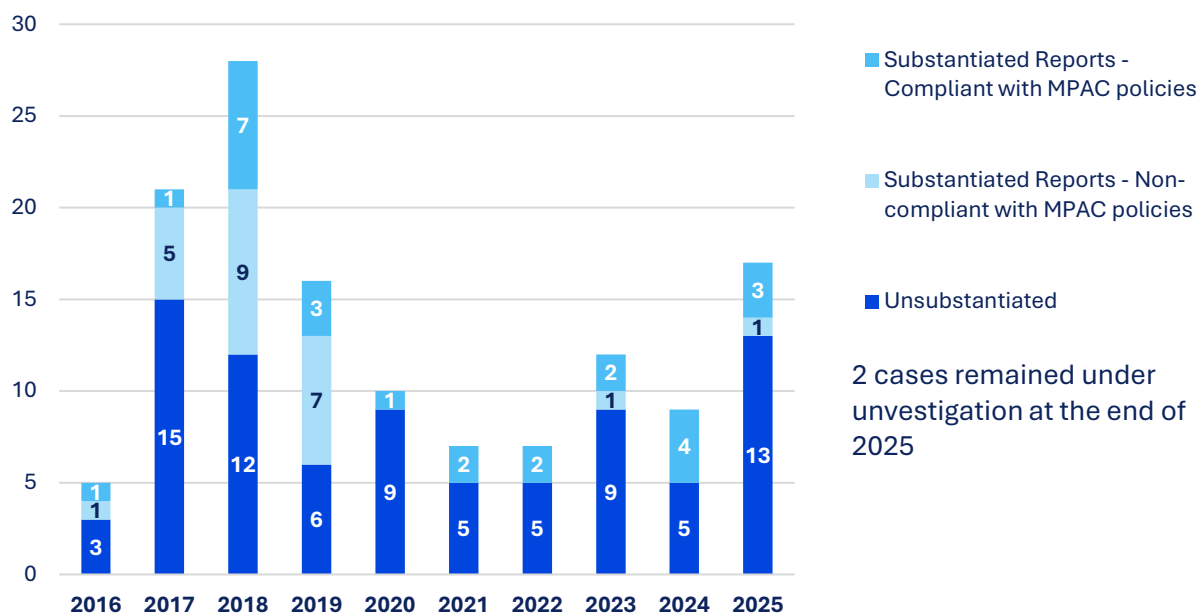
When a report is “Substantiated – non-compliant with MPAC policies,” it means the findings confirm that the allegations were accurate and involved fraud, misconduct or other irregular conduct that did not comply with MPAC policy.

When a report is “Substantiated – compliant with MPAC policies (No fraud or misconduct identified),” it means the findings confirm that the allegations were accurate; however, the concern did not constitute fraud, misconduct, or intentional wrongdoing. Instead, these findings identify data issues or opportunities for process improvement.

During 2025:

- 17 reports were investigated to completion.
- 4 cases were substantiated.
- 13 cases were unsubstantiated.
- The 7 reports determined to be outside the scope of the program did not proceed to investigation.
- As of December 31, 2025, 2 disclosures remained under investigation.

The chart below summarizes the outcomes of cases investigated:



### Summary of substantiated cases:

Investigations identified three substantiated cases primarily related to missing or inaccurate property assessment data. In each instance, appropriate corrective actions were taken, including updates to the relevant data. Although these cases were classified as substantiated, they were found to be compliant with MPAC policies, as no evidence of fraud or irregularities was identified.

One additional case was substantiated as a violation of policies and procedures. Disciplinary action was taken, and enhanced controls were implemented to prevent recurrence.

### Actions taken and improvements:

Insights gained from whistleblowing disclosures and investigations continue to inform MPAC’s improvement efforts, including:

- **Process enhancements** to strengthen fraud prevention, detection, and response processes.
- **Ongoing improvements to data quality and validation** to support accurate and reliable data and outcomes.

- **Ongoing training and awareness initiatives** to reinforce ethical expectations and reporting responsibilities.

## Protecting whistleblowers

MPAC remains committed to protecting individuals who raise concerns by ensuring:

- **Confidential reporting options**, including anonymity, when requested.
- **A robust non-retaliation framework** supported by clear policy and oversight.
- **Regular training and communication** to promote awareness of ethical standards and reporting tools.

In 2025, no retaliation complaints were reported.

**Policy reference:** Fraud and Other Irregularities Policy

## Looking ahead

The Whistleblowing Program remains a vital mechanism supporting MPAC's approach to governance and accountability. Increased reporting activity in 2025 reflects growing awareness of the program and reinforces its role in identifying risks and opportunities for improvement. No matters reported in 2025 resulted in systemic risk to MPAC's operations or public confidence.

MPAC will continue to strengthen the program through ongoing enhancements to accessibility, oversight, and awareness. By fostering a culture that encourages speaking up and protects those who do, MPAC reaffirms its commitment to ethical conduct, transparency, and public trust.

## Appendix A: Fraud and Other Irregularities

### Reporting Categories

Category	Description
<b>Financial Reporting and Accounting</b>	Items regarding the accuracy and completeness of financial statements and other financial reporting; or accounting, internal accounting controls, or auditing matters.
<b>Unethical Conduct</b>	Any situation involving unethical or dishonest conduct; conduct that is contrary to the values of the organization; or improper business conduct relating to suppliers or procurement.
<b>Conflict of Interest</b>	Any situation or action that puts an employee in conflict, or could be perceived as putting them in conflict, with the interests of the organization.
<b>Manipulation or Falsification of Data</b>	Authorized or unauthorized changes made to any data, information, or reports to manipulate or falsify documents or records for purposes such as covering mistakes or fraud; improving financial or operational results; or gaining unfair advantage in a contract.
<b>Fraud</b>	Any attempt or action to gain personal monetary or other advantage by using deceitful methods, including falsification of data, transactions, or documents; or cover-up of illegal activities.
<b>Theft</b>	Any situation or action involving an act of stealing from an organization or individual; or attempts to conceal acts of stealing, including time theft.
<b>Violation of Laws, Regulations, Policies, Procedures</b>	Any situation involving a violation of a law, regulation, or policy established by an organization or regulatory authority, including securities commissions; or a policy or procedure established by

Category	Description
	the board, management, or other authorized level of the organization.
<b>Data Security and Privacy</b>	Any activity or situation that could pose a risk to data, data security, or privacy of information, including unauthorized access, hacking, theft, or tampering.
<b>Compensation and Benefits</b>	Issues or concerns related to compensation and benefits.
<b>Products and Customer Service</b>	Issues or concerns related to products and services.
<b>Management/Supervisor</b>	Issues or concerns related to management actions.
<b>Property Assessment/Valuation Misinformation or Fraud</b>	Items relating to property assessment involving property attributes, property classification, or any other fraudulent activity relating to MPAC’s assessed value of a property.
<b>Whistleblower Protection</b>	Any retaliation or reprisal occurring as a result of an ethics report made in good faith. Reprisal could include exclusion from work activity; job loss, demotion, or reduction of pay or hours; relocation or reassignment; verbal or online abuse by co-worker or manager; or actual or threatened physical harm.