

Regulatory Report 2025

Our Mandate

CPA Ontario is the regulatory body responsible for overseeing CPAs and accounting firms in Ontario.

Like our provincial, territorial, and Bermudian (PTB) counterparts across Canada, the critical work we do protects the public, advances the profession and enables CPAs to lead business and society forward in the province and across the country.

CPA Ontario delivers on these significant responsibilities that the government has entrusted to us:

- Govern and regulate CPAs and accounting firms in Ontario which includes compliance, enforcement and disciplinary processess.
- Educate and assess CPA students
 by delivering a world-class professional education program.
- Ensure the CPA pipeline meets market demands through recruitment activities within post-secondary institutions and high schools, and by supporting new entrants to Canada.
- Grant CPA designations and public accounting licences while maintaining the rigour and high standards that set the profession apart.
- Enhance the skill and knowledge of CPAs through professional development and thought leadership.
- Support standard setting
 within Canada and at the international level.
- Enable mobility across Canada and internationally.
- Work with our provincial, territorial and Bermudian CPA counterparts
 to facilitate common entry to the profession and the portability of the designation.

Our Purpose

We **Protect** the public.

We Advance the profession.

We **Enable** CPAs to lead business and society forward.

Our Values

How we do things is just as important as what we do.

Our values guide the way we work and the decisions that we make. They reflect who we are as an organization and what we believe is right. Our values align with our purpose and enable us to deliver our strategy in a way that we can all be proud of.

These values embody how we aspire to behave in all situations with each other, our members and students, and other stakeholders. They set the expectations we have of each other.

We act with Integrity

We always do the right thing and take accountability for our decisions and work.

We are Thoughtful

We are considerate in the way we make decisions and how we engage with the public, employers, our members, students, and colleagues.

We work Together

We are a supportive and inclusive team and empower each other to achieve our personal and professional goals.

We make an Impact

We strive to make a meaningful difference to our stakeholders and the profession, delivering results with excellence.

We are Forward-Thinking

We are curious, innovative, and data-driven, and ensure our work benefits business and society.

Our Strategic Priorities

Our strategy defines our priorities as an organization and guides the work that we do.

Our strategy is designed to meet the needs of today's complex business environment while responding to the trends and forces reshaping our profession and the economy at large.

Our five strategic pillars focus our efforts. Everything we do supports these pillars and ensures that our work helps us achieve our purpose.

Protect the public interest by ensuring our members, students and employees maintain the highest standards of integrity.

Advance the profession by developing CPAs who can lead in an ever-evolving world.

Build a robust pipeline of high calibre individuals.

Create a strong brand and demand for CPAs.

Cultivate an environment that enables our people to thrive together.

Contents

Message from the executive vice-President	0
The Regulatory Continuum	10
Navigating Change While Strengthening Professional Excellence	11
Reinforcing Professional Standards in a Rapidly Changing World	17
Evaluating Quality and Upholding Professional Standards	23
Safeguarding Confidence and Upholding Public Trust	30
Appendix A: Summary of Disciplinary Actions	32
Appendix B: Summary of Good Character Matters	59
Appendix C: Regulatory Committees	61



Janet Gillies
CPA, CA
Executive Vice-President,
Regulatory & Standards

From the rapid rise of artificial intelligence and sustainability reporting to the need to apply ethical judgment in a changing world, CPAs are navigating an environment that is more complex, more connected, and more consequential than ever.

These forces are not only reshaping professional practice, they are also redefining the role CPAs play in safeguarding public trust and strengthening Canada's economy. As a result, our regulatory approach is evolving as we collaborate on international standards, strengthen oversight and support members with the tools and guidance they need to lead with confidence and integrity.

This past year, we took decisive action to ensure our regulatory responsibilities were met with clarity and purpose. We contributed to global standard-setting conversations to make sure that the perspectives of CPAs in Ontario and their front-line experience were reflected. Through responses to exposure drafts and participation in international forums, we reinforced the importance of Canadian perspectives in global regulation, while aligning our own standards to reflect emerging risks and expectations.

In parallel, we deepened our oversight by expanding our Enhanced Quality Management Review (EQMR) program to assess not just whether firms have the right systems in place, but whether those systems are working. In 2025-26, we will continue and evolve with targeted inspections of firms that audit reporting issuers, focusing on areas of the greatest risk to the public.

Our work is grounded in a commitment to excellence, reinforced by a strong approach to enforcement. Where standards are not met, we act decisively to protect the public and uphold the integrity of the CPA designation. At the same time, we support members with practical tools and timely guidance, helping them meet emerging expectations with confidence.

For example, when practice inspection results signaled that some compilation only firms were having difficulty meeting the System of Quality Management standards set out in the Canadian Standards on Quality Management, we developed targeted in-house tools – most notably the System of Quality Management for Firms Performing Compilation Engagements. This practical tool supports quality management and compliance.

And while we have continued to uphold the standards of the profession, we have turned our attention to the forces transforming our economy and the profession. In the face of the fundamental disruption of generative AI, we have reinforced the importance of its ethical use. As Canadian agencies and international organizations have committed to robust international cooperation to combat money laundering, we have published guidance on the evolving risks and responsibilities relevant to CPAs. In a new age of tariffs and trade disruptions, we have released insights on how to navigate these challenges. All of these efforts reflect our commitment to help CPAs adapt in a shifting landscape, while staying anchored in our core purpose.

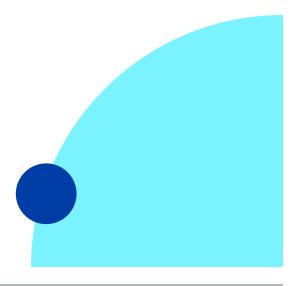
CPA Ontario has long enabled seamless mobility across the country. As efforts to reduce interprovincial barriers build, our proactive approach, such as aligning CPD requirements and identifying shared standards, supports this progress. These efforts not only attract top talent to Ontario but also strengthen the profession's contribution to Canada's economic resilience.

In a world defined by complexity, CPA Ontario remains steadfast: protecting the public, advancing the profession, and enabling CPAs to lead with clarity, confidence, and integrity.

Janet Gillies, CPA, CA

Executive Vice-President, Regulatory & Standards

ant land



The Regulatory Continuum

CPA Ontario's regulatory duties involve a continuum of compliance, advising, inspecting, investigating, enforcing and imposing discipline if members, students or firms fall short of professional standards. No matter how the business landscape changes, our comprehensive oversight will remain.

Protection of the public is at the core of what we do at CPA Ontario.

- Registrar's Office Admission & Licensing | Registering Firms | Monitoring Compliance
- Professional Advisory Education | Advisement | Guidance
- Practice Inspection Compliance with Standards | Member & Firm Inspections
- Disciplinary Process Standards Enforcement | Investigations & Prosecutions

Navigating Change While Strengthening Professional Excellence

The Registrar's Office

Promoting technical rigour and excellence, compliance with regulatory and professional obligations, and enabling cross-country and international labour mobility remains central to the mandate of the Registrar's Office.

CPA Ontario ensures that all applicants for admission to membership and licensure meet the profession's high standards, including education, experience, and good character. This includes referring matters to the Admission and Registration Committee (ARC) for good character hearings, where necessary, for both student registration and admission to membership applicants.

Student	80%
Provincial Transfer	10%
Direct admission under international agreements	5%
Memorandum of Understanding international agreements	5%

Good Character

Maintaining both rigorous academic and experience requirements for qualification and a strong emphasis on ensuring applicants seeking admission to membership are of good character are critical for protecting the public. As part of the admission process, all prospective CPAs must demonstrate good character. If concerns arise – such as a criminal record, academic dishonesty or use of misleading or inaccurate information – the Registrar's Office refers the matter to the ARC for a Good Character Hearing. One matter referred to the ARC resulted in a decision this year, which can be found listed in Appendix B.

105,227

CPA Ontario Members

4,082

PAL Holders

8,011

Firms

19,066

CPA Ontario Students

1,087

Certificates Of Authorization

Reinforcing Compliance and Lifelong Learning

CPA Ontario oversees compliance with regulatory and professional obligations through regular, risk-based audits that monitor critical areas such as:



Members are subject to administrative action when they prove unable or unwilling to meet professional obligations, including completing their AMD, completing their CPD learning and declaration and updating their PLI. Failure to comply could result in membership suspension, revocation and the loss of their public accounting licence.

Suspensions, Revocations and Deregistrations

The following administrative actions were taken due to non-compliance with regulatory obligations:

Members	FY25	FY24
Suspensions	572	603
Revocations	391	438
Licences	FY25	FY24
Suspensions	8	10
Firms	FY25	FY24
Firms Suspensions	FY25 15	FY24

CPD Requirements

Members and firms are reminded of their obligations for ensuring that CPD meets the requirements set out in the <u>CPA Ontario Code of Professional Conduct</u> (the Code) and <u>CPA Ontario Regulation 7-2</u>. Under Regulation 7-2, members must complete a minimum of 120 hours of relevant CPD over a rolling three-year period, at least 50% of which must be verifiable.

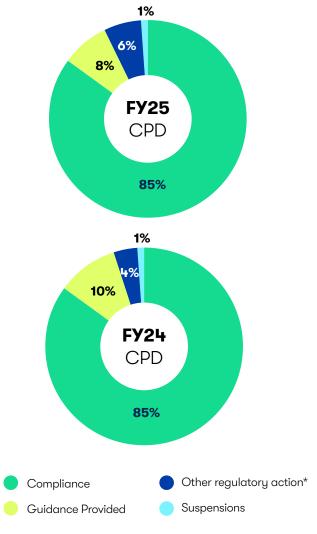
CPD must also contain significant intellectual or practical content.

For those applying for or renewing a Public Accounting Licence (PAL), CPD must directly support the competencies required for public accounting and comply with International Education Standard 8 (IES 8). Additionally, CPD for PAL holders must be progressive, cover the breadth of the area of practice and be proportionate to the role. It is expected that much of this learning contain sufficient technical content to sustain and advance competence in public accounting.

Recognizing the vital role of CPAs in Canada's capital markets and the trust the public has in the profession, CPA Ontario emphasizes lifelong learning and technical excellence. In addition to staying ahead of the curve on disruptors like Al and tariffs, CPAs must also continue building on their core competencies in accounting, assurance and professional ethics.

Over the past year, CPA Ontario completed its annual CPD audit to ensure members met both their annual and triennial CPD obligations. Almost 3,000 members were selected for audit, including 10% of PAL holders in Ontario from a cross-section of firms. In parallel, we continued robust reviews of PAL applications and conducted firm-level audits of professional liability insurance coverage.

CPD Audit Results



* Other regulatory action includes completion of additional verifiable CPD hours to rectify deficiencies identified though the audit, and ensure the member was meeting the set standard.

Third Party CPD Providers

We are aware that over the past year, third-party CPD providers continued to send promotional messages regarding CPD requirements. Some of these communications used regulatory-style language and emphasized CPD obligations and deadlines in a way that could be misleading or cause confusion.

As part of our commitment to supporting members, we promptly communicated to clarify the situation. We provided guidance on how to distinguish legitimate CPA Ontario communications from those of unaffiliated providers, including a reminder that all official communications regarding your regulatory

obligations – including CPD compliance — will clearly identify CPA Ontario as the sender. CPA Ontario members are obligated to take CPD that meets the requirements of Regulation 7-2. CPA Ontario is the only body responsible for determining what meets the requirements of its CPD regulation. Third party PD providers cannot unilaterally declare that their offerings qualify for CPD.

Professional Liability Insurance

Maintaining PLI ensures public protection, and is an essential responsibility for registered firms, which is why CPA Ontario routinely audits firms to verify compliance with insurance requirements. This year's audit showed 12% of firms required follow up to address reporting discrepancies. There was one membership suspension for failure to comply with the audit request. Non-compliance with PLI reporting requirements may lead to the suspension of both the firm representative and the firm itself.

The Importance of Practice Continuation Planning for CPAs

For CPAs – particularly those operating in small and medium-sized practices – practice continuation planning is both a matter of public protection and business imperative. Clients rely on the continuity of professional services and without a clear plan in place, unexpected disruptions can have significant consequences for firms, clients and the public.

CPA Ontario continues to emphasize the importance of proactive planning through the Regulatory Standard, such as in the article Be Prepared: The Importance of Practice Continuation Planning for CPAs. Regularly reviewing and updating a Practice Continuation Plan ensures leadership at the firm remains aligned with the evolving needs of the firm, technological advancements, regulatory expectations and the public interest.



Private Equity and Alternative Practice Structures: Navigating Innovation Within Regulatory Boundaries

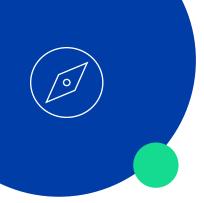
Private equity (PE) firms view accounting practices as investment opportunities, leading to a rise in Alternative Practice Structures (APS) and PE-backed arrangements in U.S. and Europe.

When PE intersects with assurance services, it raises independence concerns, as engagement quality and objectivity must remain uncompromised. Throughout the year, CPA Ontario reinforced compliance with professional and regulatory requirements.

CPA Ontario members can only provide public accounting and accounting services to the public through registered firms, and members must follow the Code regarding restrictions around associating with unregistered entities. Many services proposed under APS models still fall within CPA Ontario's definition of "providing accounting services to the public", triggering firm registration requirements and regulatory oversight — even when the structure appears advisory-focused or non-traditional.

In Ontario, our regulatory framework is clear:

- Private equity ownership is not permitted in registered public accounting firms.
- Any firm engaged in the "practice of public accounting" or "providing accounting services to the public" must be registered with CPA Ontario without exception.
- Only specific firm structures are permitted: sole proprietorships, general partnerships, limited liability partnerships and professional corporations.
- All partners or shareholders of a registered firm must be CPA Ontario members in good standing.



Supporting Interprovincial and International Mobility

CPA Ontario's regulatory framework not only supports the mobility of CPAs from across Canada relocating to Ontario, it also protects the public by ensuring oversight of all CPAs operating within the province.

In response to U.S. tariffs, the Ontario government's plan to strengthen provincial economic resilience includes working collaboratively with provincial and federal counterparts to eliminate interprovincial trade barriers. The Ontario government introduced Protect Ontario Through Free Trade Within Canada Act, 2025 — legislation that creates a legislative framework to enable "As of Right" entry for occupations governed by regulators under the Ontario Labour Mobility Act, 2009.

The new Act unilaterally recognizes certified workers coming to Ontario from another province as qualified to work in the same occupation in Ontario for a period of six months, while waiting to be registered by the Ontario regulator. Additionally, the government signed MOUs with a selection of provincial counterparts to recognize certified workers in Ontario practicing in other provinces.

The CPA designation serves as an example of one of the most portable in Canada. Its high level of mobility is enabled by:

- Harmonized education and admission standards
- Common Continuing Professional Development (CPD) requirements
- A highly harmonized Code of Professional Conduct
- Adherence with Canadian accounting and assurance standards across all provincial and territorial bodies

As a result of the above, CPAs could transfer their membership into Ontario through a streamlined and efficient process even before the introduction of new provincial legislation.

As an open and globally connected profession, CPA Ontario maintains a robust network of Mutual Recognition Agreements, Reciprocal Membership Agreements, and Memorandums of Understanding collectively referred to as "the international agreements." These agreements, established between provincial and territorial CPA bodies and globally recognized international bodies enable qualified accountants from around the world to pursue the CPA designation in Ontario.

These applicants are required to meet our good character requirements, as well as eligibility requirements specific to the relevant agreement. For members of professional bodies without a direct agreement with CPA Ontario – but who are part of the International Federation of Accountants (IFAC) – an accelerated pathway to the profession is also available.

This year, CPA Ontario expanded its international reach by entering new Memorandums of Understandings (MOUs) with the Institute of Cost and Management Accountants of Pakistan and the Institute of Chartered Accountants of Nigeria. These agreements allow eligible applicants who meet the eligibility criteria in the MOUs to advance directly to the Common Final Examination (CFE), further strengthening Ontario's pipeline of globally trained professionals.

Working collaboratively with our provincial and territorial counterparts to implement these international agreements, CPA Ontario is helping to build international professional networks, support global financial markets and build a stronger profession.

Mutual Recognition Around the World



Accounting body/bodies	Jurisdiction(s)
IMCP Mexico and U.S. State Boards of Accountancy	Mexico and USA
CAANZ	Australia and New Zealand
ICAEW	England and Wales (United Kingdom)
CIMA	United Kingdom
HKICPA	Hong Kong
CA Ireland	Ireland
ICAS	Scotland (United Kingdom)
SAICA	South Africa
ICAZ	Zimbabwe
ICAN	Nigeria
IEC-IAB	Belgium
CSOEC	France
JICPA	Japan
ICAI	India
ICAP	Pakistan
ICMAP	Pakistan

Reinforcing Professional Standards in a Rapidly Changing World

Professional Advisory

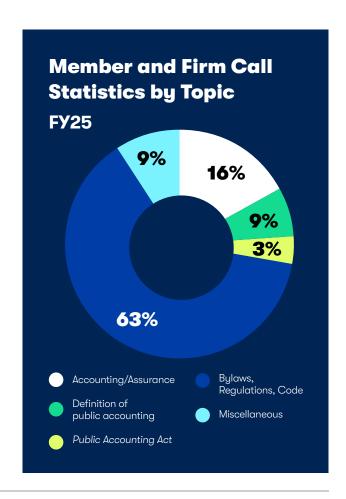
The operating environment for CPAs continues to evolve at a rapid pace, as professional standards are shaped by emerging technologies, global trade uncertainty and more. At CPA Ontario, we are equipping members to navigate emerging challenges while upholding the profession's steadfast commitment to ethical excellence.

CPA Ontario's Professional Advisory Services (PAS) provides timely guidance and resources to members, students and firms. The PAS team supports members in meeting the profession's high standards and in upholding public trust through a strong commitment to the ethical principles that form the foundation of the Code.

66 I appreciate the timely feedback, supplemental resources, as well as the ability to ask clarifying questions of the Professional Advisory team. 99

Members can reach out to PAS for tailored guidance to help navigate complex professional dilemmas. This year, we addressed more than 3,600 inquiries from members and students, with the majority related to the Code, CPA Ontario Bylaws and regulations. By interpreting the nuances of the Code in context with day-to-day practice, we support members as they uphold the highest standards of integrity, even as standards continue to evolve.

66 When there are accounting coaches charging thousands of dollars for guidance, I get great guidance and advice from the PAS team. 99



Sustainability Simplified

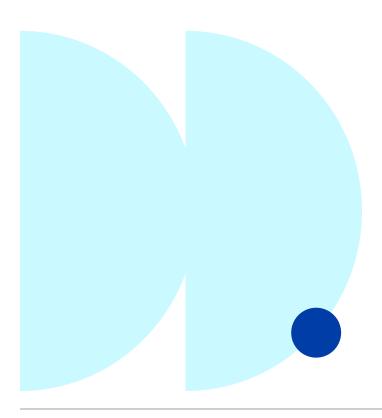
The CPA profession is well-positioned to support sustainability reporting and assurance by applying core competencies of risk assessment, professional skepticism, problem-solving and decision-making.

As part of CPA Ontario's commitment to advance the profession and support members in their sustainability upskilling journey, this year we continued expanding our <u>Sustainability Simplified Hub</u>, enriching our resource offerings with new publications including the <u>Greenhouse Gas (GHG) Measurement and Reporting Guide, OSFI B-15: Implications for Small and Medium Sized Businesses and CPA Practices and Bill C-59: What CPAs Need to Know.</u>

Complementing these resources, we launched:

- <u>Sustainability Stories</u> a new feature that showcases CPAs who successfully upskilled to become leaders in sustainability reporting and assurance.
- Opportunities in Sustainability a complementary event featuring keynote speaker Stephane Tardif, CPA, Managing Director, Climate Risk at the Office of the Superintendent of Financial Institutions (OSFI), and a panel of sustainability experts discussing the impact of mandatory climate reporting.

As standards and regulations evolve, CPA Ontario will continue to offer resources to support members in navigating changes and staying informed.





A Strong Voice at the Global Standard Setting Table

CPAs in Ontario are on the forefront of Canadian and global business. As standards continue to evolve, it is critical to bring the front-line perspectives of Ontario's CPAs and CPA Ontario's regulatory lens to Canadian and international standard setting.

In 2024, CPA Ontario responded to exposure drafts and consulted with Canadian and international standard setting bodies, including:

- Auditing and Assurance Standards Board's (AASB) Canadian Standards on Related Services (CSRS)
 4250, Compilation Engagements on Future-oriented Financial Information and Pro Forma ED, including researching, obtaining feedback from stakeholders and assessing implications.
- Prepared and filed a joint response with CPA Quebec to the International Auditing and Assurance
 Standards Board (IAASB) Exposure Draft; Proposed International Standard on Auditing 240 (Revised): The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements.
- The **Canadian Sustainability Standards Board (CSSB)** consultation on Canadian Sustainability Disclosure Standards (CSDS) 1 and 2 and the proposed Criteria for Modification Framework.
- The International Accounting Standards Board (IASB) Exposure Draft on Climate-related and Other Uncertainties in the Financial Statement.
- The **Canadian Sustainability Standards Board (CSSB)** consultation on Proposed Strategic Priorities for 2025 to 2028.
- The Competition Bureau consultation on Draft Guidelines on Environmental Claims.

For more information on how changing standards can impact the work of Ontario CPA's, visit <u>CPA Ontario</u> <u>Guidance on Compliance Knowledge Hub.</u>

Guidance for Evolving Standards

Drawing on deep industry expertise, CPA Ontario is developing a suite of robust resources designed to help CPAs stay apprised of changing professional standards, navigate technical challenges and make informed decisions. These accessible and comprehensive tools and guidance materials cover topics ranging from accounting, assurance, ethics, advanced technologies and practice management.

Over the past several years, firms that only perform compilation engagements faced challenges with the adoption of the latest compilation standard, Canadian Standards on Related Services (CSRS) 4200, which took effect in 2021.

As of December 15, 2023, these same firms were also required to implement the new quality management standard. The previous standard, the Canadian Standard on Quality Control (CSQC), specifically excluded these firms. In 2024, inspections found that many of these firms struggled with adopting CSQM 1 and 2, and failed to document their Systems of Quality Management (SoQM) appropriately.

To address the specialized needs of these firms, CPA Ontario developed resources, including <u>System of Quality Management for Firms Performing</u>

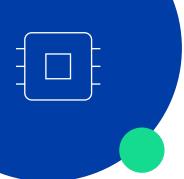
<u>Compilation Engagements</u>, which is a tool that firms can use to help develop and document their SoQMs.

To provide further aid and support to members, students and firms, the <u>Guidance on Compliance Knowledge Hub</u> serves as a centralized, real-time platform for updates on compliance requirements, regulatory changes and ethical best practices. This digital hub ensures that members have continuous access to critical insights that support adherence to professional standards. Complementing the Knowledge Hub is the <u>Regulatory Standard newsletter</u>, which is distributed quarterly and includes member and firm obligations, additional guidance and thought leadership on emerging issues.

In addition to these resources, PAS continues to provide expert technical support on accounting, assurance and financial reporting standards. By offering a trusted avenue for advice, CPA Ontario is helping to mitigate risks before they impact the public by encouraging members to proactively identify and resolve issues.

66 The advisor was very professional, helpful, understanding, empathetic and insightful. 99

As standards evolve and Al continues to disrupt the economy, reinforcing a culture of continuous improvement within the profession is essential. CPA Ontario is committed to providing support to CPAs and firms in creating that culture. By providing curated resources and learning opportunities, we are equipping members with the skills that are indemand in the marketplace.



No Algorithm for Ethics: Al and Regulatory Guidance

CPAs are increasingly exploring using Al to enhance their work. To do this effectively, while upholding the highest standards of the profession and protecting the public, it is essential to understand the obligations laid out in the CPA Code of Professional Conduct. The fundamental principles in the Code are practical and powerful tools for CPAs to navigate the potential of generative Al.

Through the Regulatory Standard newsletter, CPA Ontario has also provided members with resources to help them understand their obligations in the use of Al. One such resource is the article <u>Accountabilities for CPAs in the Age of Artificial Intelligence</u>, which explores the implications of Al and its potential risks, including:

- How to develop and administer the governance and policies on the ethical use of generative Al.
- How to identify risks, including data hallucinations, data bias and cybersecurity.
- How to build capacity within your organization with the necessary technical expertise in the fields of Al.

CPA Ontario supported this guidance through a <u>case study</u> on how to understand and mitigate some of the risks associated with data hallucinations and large language models used in data collection and research.

CPAs should apply the same obligations and accountabilities that govern the use of any software when using artificial intelligence.

Where Al has been used in the performance of assurance engagements, firms should ensure documentation includes:

- A clear understanding of the Al tool's capabilities, limitations and the specific tasks it is designed to perform.
- An evaluation of data sources, including how data was collected and any potential biases that could affect the tool's performance.
- Confirmation that the tool's algorithms and methodologies are based on accurate, current and relevant information.
- Evidence of a thorough understanding of the Al tool's inner workings, including its algorithms, decision-making processes and underlying assumptions.
- Validation of the tool's outputs, including comparisons with results obtained through traditional methods to ensure reliability and accuracy.

As Al continues to evolve, CPA Ontario will ensure that the use of these innovative technologies upholds the integrity, objectivity and quality expected of the profession.



Trade & Growth Insights

In February 2025, The Trump administration shook the Canadian economic landscape with the announcement of new tariffs on Canadian imports, prompting companies to reassess their strategies and explore ways to mitigate potential disruptions to supply chains. CPAs are at the forefront of these changes, playing a critical role in helping organizations navigate the challenges of shifting economic and trade dynamics by offering compliance support, financial analysis and strategic guidance.

In response to this evolving landscape, CPA Ontario launched the Trade & Growth Insights hub to provide members with timely, practical insights. In addition to up-to-date analysis on the challenges facing the Canadian economy and strategies for building a more competitive, productive, and resilient country, the hub features essential resources for managing trade-related risks and understanding the changing economic environment, including:

- Budgeting and Forecasting Strategies at a Time of Tariff Turmoil: A Guide for CPAs
- · Potential Impacts of Trade Relations with the United States on the Financial Statements of Private Enterprises
- Transfer Pricing in a Trade War An Interview with CPA Matthew Wall
- Managing Professional Standards Amid Tariff Changes

Each article delivers in-depth analyses and actionable insights that empower CPAs to manage uncertainty, assess financial implications and support informed decision-making as they help business navigate these uncertain times.

Evaluating Quality and Upholding Professional Standards

Practice Inspection

Practice Inspection plays a critical role in CPA Ontario's proactive oversight of the profession, rigorously evaluating practitioners who perform assurance, compilation and other specified engagements to ensure their work complies with the highest standards.

CPA Ontario's approach to practice inspection provides a comprehensive view of the quality of a firm's work by evaluating both the design and implementation of quality management systems and reviewing completed engagement files. This dual focus allows for a more accurate assessment of whether firms are meeting the expectations of the public and standards of the profession.

When deficiencies are identified, the Practice Inspection Committee (PIC) determines whether remedial action is required, which may include referring the matter to the Professional Conduct Committee (PCC) for further investigation and potential disciplinary action.

Enhanced Quality Management Review

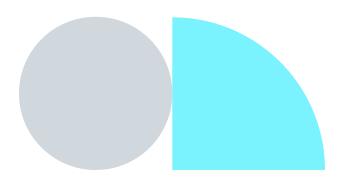
Confidence in engagement quality comes from knowing that firms have designed, implemented and consistently applied policies and procedures that promote and support quality in accordance with professional standards.

It is why, after the 2022 practice inspection cycle identified concerns with how firms were managing quality, CPA Ontario conducted a focused review and reported its results in <u>Upholding High Standards</u> to <u>Protect the Public: Managing Audit Quality 2023</u>. This report detailed a focused review of public accounting firms in Ontario that conduct audits of

Building on this work in 2024, CPA Ontario introduced the Enhanced Quality Management Review (EQMR) program, which not only assesses the design and implementation of a firm's relevant controls and processes but also tests the effectiveness of those controls. The program broadens the focus from audit quality to overall engagement quality, reinforcing the highest standards of quality for all engagements covered by the Canadian Standards on Quality Management (CSQMs).

As part of the EQMR, CPA Ontario reviewed each firm's process for establishing quality objectives, identification and assessment of quality risks, and design and implementation of responses to address those risks.

The EQMR program was piloted with three firms in 2023-24 and expanded to nine additional firms in 2024-25. Findings were identified in each of the firms subject to review.



reporting issuers.

Of the 12 firms reviewed:

- 10 firms had findings that were not considered a significant risk to the public.
- One firm was subject to reinspection due to the number of deficiencies identified in their 2023–24 EQMR. In 2024–25, the reinspection found they had substantially addressed the deficiencies by enhancing their quality management system, and no further action was required.
- One firm was referred to the PCC due to the severity and volume of deficiencies. This matter remains under review to determine if independent investigation and further disciplinary actions are warranted.

Regardless of the outcome, every firm that was subject to an EQMR received a Quality Management Review Report, outlining findings and actions the firm needs to take to improve controls and processes.

Given the importance of quality management, CPA Ontario encourages all practitioners to participate in relevant professional development.

Review the findings of our EQMR program, <u>Upholding</u> <u>High Standards to Protect the Public: Managing</u> <u>Quality Report 2025</u>.

Risk Focused Inspections

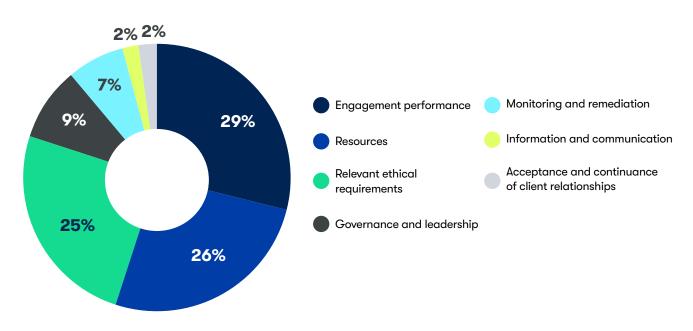
In 2025–26, CPA Ontario will take further steps in the evolution of Practice Inspection by building on insights gained through the EQMR program. This next phase will focus on firms who audit reporting issuers (RI), all of which are now subject to the EQMR. We will conduct targeted inspections of RI engagement files, concentrating on areas that present the greatest risk to the public. In addition to foundational audit areas, inspections will focus on areas of higher risk such as impairment of assets, revenue recognition and business acquisitions.

Importantly, non-RI files within these firms will continue to undergo full inspections, ensuring a comprehensive and robust program. This enhanced approach will result in inspections that are:

- Complementary by leveraging the work already performed through the EQMR
- Meaningful by focusing on files and areas of the highest public risk
- Comparable aligning with inspection practices of global regulators

The outcomes of these inspections will be included in next year's Regulatory Report, further reinforcing our commitment to quality and public protection.

Findings by Category in EQMR Inspections

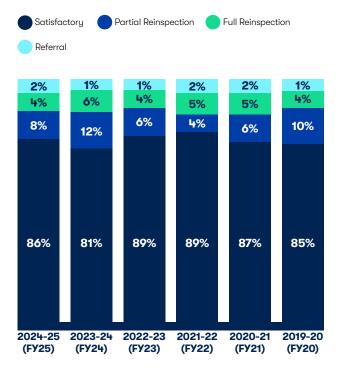


Results of Assurance Practice Inspections

CPA Ontario inspects firms a minimum of once every three years. During the 2024-25 inspection year we inspected or reinspected 1,256 firms, including 464 firms providing assurance services and 792 firms providing compilation services only.

Among the assurance firms inspected, approximately 86% achieved satisfactory inspection results while the remaining 14% were found to have reportable deficiencies of such significance that they were subject to remedial action.

Trends in Inspections of Assurance Firms



Inspection Findings Definitions

All findings in a practice inspection are classified in one of three categories:

Significant reportable deficiency

A reportable deficiency that is important to the quality of the work performed to support the report or the usefulness of the financial statements.

Reportable deficiency

A finding that is a material departure from Professional Standards.

Non-reportable matter

A matter that is an immaterial departure from Professional Standards.



Inspection Outcome Definitions

Satisfactory

No further action was required or the firm provided an acceptable action plan.

Partial reinspection

Certain components of the firm are subject to reinspection such as a focus on a certain partner or accounting or assurance framework.

Full reinspection

All components of the firm are subject to reinspection.

Referral

The firm is referred to the PCC, who will perform an independent investigation to determine whether disciplinary actions are warranted.

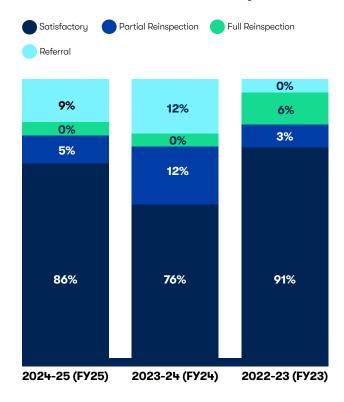
Results of Assurance Practice Reinspections

When the outcome of an inspection is not satisfactory but does not present an immediate risk to the public, firms are required to undergo a reinspection rather than being immediately referred to the PCC. This approach provides firms with the opportunity to take corrective action and bring their work up to standard.

Historically, the reinspection process has proven highly effective. Over the past three years, satisfactory outcomes of reinspections have ranged from 76% to 91%.

Most firms view reinspection as a constructive process – an opportunity to implement timely and appropriate changes that improve the quality of their engagements. This is reflected in the consistently high number of reinspections that have satisfactory results. However, when firms do not demonstrate sufficient improvement following the reinspection process, they are referred to the PCC for investigation to determine if disciplinary action is required.

Trends in Assurance Reinspections



Nature of Referrals to PCC

	2024-25 (FY25)	2023-24 (FY24)	2022-23 (FY23)
Inadequate professional standards	6	3	2
Modification/ backdating of working papers	0	4	1
Both professional standards and modification/ backdating	4	1	1
Both professional standards and licensing issues	2	0	0
Licensing issues	0	4	0
Total Referrals	12	12	4

In 2024-25, a total of 12 firms were referred to the PCC. Of these, seven were referred due to insufficient improvement in work quality after a reinspection, while the remaining referrals were related to specific matters of concern.

The PCC received referrals involving four firms where there were possible instances of document modification and backdating - intended to make it appear as though documents were prepared on or before the date of the related report. In each case, the allegations related to individuals and may not be considered pervasive across the firms. One of these referrals involved an auditor of reporting issuer (RI) engagements.

Backdating poses a serious threat to public trust and the integrity of the profession. It obscures the actual timing and nature of work performed and reviewed, raising concerns about the accuracy, reliability and overall quality of the audit. As highlighted in our focused review of audit quality (Upholding High Standards to Protect the Public: Managing Audit Quality 2023), such practices undermine confidence in the profession and the assurance it provides.

Backdating is a clear violation of the CPA Code of Professional Conduct and is never acceptable.

National Firm Results

During the 2024-25 inspection year, the Practice Inspection team inspected 305 engagement files issued by Ontario's national accounting firms.1

Significant reportable deficiencies were identified in 32% of inspected files, compared to 28% in 2023-24 and 23% in 2022-23. These inspections resulted in two firms requiring reinspection, consistent with 2023-24 and up from one firm in 2022-23. While no deficiencies were found to be severe enough to adversely affect the opinion on these engagements or warrant a referral to PCC, the upward trend in significant deficiencies is noteworthy.

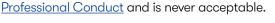
The most common areas of concern included:

- Occurrence and accuracy of revenue
- Valuation and collectability of loans and other assets

These areas represent heightened risk to the public and, considering these insights, will be a key focus in the targeted inspections of firms that audit RIs next year.

These deficiencies are a clear indicator of the quality of the work being performed and demonstrate the necessity of maintaining a culture of continuous improvement, where firms are refining their policies and practices on an ongoing basis.

Through the EQMR, CPA Ontario will continue to monitor the work of the national firms. For firms not subject to an EQMR, every CPA is encouraged to perform a thorough assessment of their System of Quality Management (SoQM) and develop action plans to reduce deficiencies and improve audit and engagement quality.



^{1.} BDO Canada LLP, Deloitte LLP, Ernst & Young LLP, Doane Grant Thornton LLP, KPMG LLP, MNP LLP, PricewaterhouseCoopers LLP

Results of Compilation-Only Inspections

There are ongoing concerns with inspection results for firms that perform compilation engagements only. Under the previous standard (Section 9200), 99% of inspections concluded with satisfactory results. However, the adoption of the current Canadian Standard on Related Services (CSRS) 4200, which came into effect in 2021-22, has presented ongoing challenges for many practitioners.

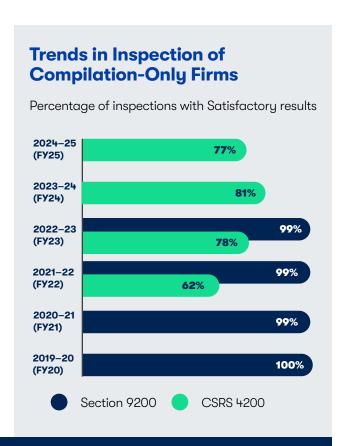
Early adopters of CSRS 4200 were inspected in 2021-22, while 2022-23 inspections included a mix of both the old and new standards. Since 2023-24, all inspections have been conducted under the new standard. Of the 792 firms inspected in 2024-25, only 77% resulted in satisfactory results.

In 2022-23, almost two-thirds of unsatisfactory results were due to firms failing to adopt the new standard in its entirety. While this rate has declined significantly in 2024-25 – indicating growing awareness and adoption among members – it remains a concern. Notably, in 2024-25, almost half of all unsuccessful compilation inspections were due to insufficient documentation regarding the client's business, operations, accounting systems and the basis of accounting applied.

Over the past three years, we have substantially inspected all firms who only perform compilation engagements. We expect results to improve now that these firms have been notified of their deficiencies and have put forward the necessary action plans to address them.

As of December 15, 2023, firms that perform only compilation services were required to implement the new quality management standard. As the prior standard, the Canadian Standard on Quality Control (CSQC), excluded these firms, we found that the majority of practitioners inspected in 2024-25 struggled with adopting CSQM 1 and 2 and failed to document their Systems of Quality Management appropriately.

These ongoing issues were the driver behind the development of in-house tools by Professional Advisory Services, such as the <u>System of Quality Management</u> for Firms Performing Compilation Engagements.



	2024-25 (FY25)	2023-24 (FY24)	2022–23 (FY23)
Failure to adopt CSRS 4200 in its entirety	28%	46%	62%
Missing or misleading basis of accounting disclosure	28%	24%	20%
Insufficient documentation required by CSRS 4200	44%	30%	18%

Deficiencies Driving Unsatisfactory Compilation Inspection Results

Most Common Significant Reportable Deficiencies Identified in Audit Engagements

- Substantive audit procedures performed not sufficiently documented, most commonly in the areas or revenue, payroll and loans receivable.
- 2 Journal entries not tested.
- 3 Subsequent events procedures not completed up to the date of the report.
- Written representation from management not appropriately dated.
- No evaluation of which types of revenue, transactions or assertions gave rise to fraud risk.
- 6 Insufficient documentation of risk assessment procedures with respect to obtaining an understanding of the entity's control activities and information systems.
- **7** Auditor's report not compliant with requirements.
- 8 No assessment of inherent risk for identified risks of material misstatement at the assertion level.
- Inappropriate design and execution of substantive analytical procedures.
- No written agreement on the terms of the audit engagement.

Most Common Significant Reportable Deficiencies Identified in Review Engagements

- 1 Inquiry and analytical procedures not sufficiently documented, most commonly in the areas of revenue, related party balances and classification of preferred shares.
- **2** Date of written representation not near as practicable to date of report.
- 3 Identification of areas of potential material misstatements not documented.
- Engagement letter not obtained or obtained prior to performing the engagement.
- Required inquiries of management not completed or inadequate.
- **6** Lack of documentation of individuals performing and reviewing the work, including the date of completion and review.
- 7 Understanding of entity's accounting systems and records not adequately documented.
- **8** Practitioner's report missing required items.
- **9** Documentation of understanding of the entity insufficient.
- **10** No determination of materiality.

Safeguarding Confidence and Upholding Public Trust

Complaints, Investigations and Prosecutions

CPA Ontario's disciplinary process plays a critical role in maintaining public trust and professional integrity within the accounting profession. When concerns about potential misconduct arise, they are addressed through a structured process that begins with a formal complaint and may proceed through investigation and, if warranted, a hearing before the Discipline Committee.

This process ensures fairness, transparency, and accountability, with disciplinary outcomes that may include sanctions such as fines, suspension or revocation of membership. Decisions of the Discipline Committee are published to reinforce the profession's commitment to ethical standards and protect the public interest.

Standards Enforcement

Standards Enforcement serves as the critical channel through which public concerns about CPA Ontario members, students or firms are directed to the Professional Conduct Committee (PCC). Our streamlined complaint-handling process plays a vital role in maintaining public trust and confidence in the profession. Each complaint is assessed based on three key criteria:

- Jurisdiction: Does CPA Ontario have oversight over the matter?
- Professional Standards: Does the alleged misconduct suggest a failure to meet the requirements of the CPA Code of Professional Conduct?
- Breach: Was there a clear violation of the standards of the profession?

Acting as unbiased fact finders, Standards Enforcement gathers relevant information from all involved parties. Cooperation with the regulatory process is mandatory and failure to cooperate may result in formal allegations of professional misconduct and a hearing before the Discipline Committee. Consistent with the prior year, we met our target of issuing decisions within an average of eight months.

Complaint volumes increased this year, and new complaints reflected rising complexity and emerging issues, including matters related to social media, confidentiality breaches due to deception by cybercriminals, and an increase in self-reported, multi-file matters. As we continue to refine our processes to manage these evolving and complex issues, we remain steadfast in our commitment to protecting the public and upholding the integrity of the profession.

Investigations and Prosecutions

The Investigations and Prosecutions team investigates and litigates cases involving violations of the Code and prosecutes non-members under the *Provincial Offences Act* in court for the misuse of the CPA designation or other unauthorized practice.

CPA Ontario continued to bring investigations to the PCC for consideration expeditiously. Consistent with prior years, we met our target of concluding 85% of investigations within an average closure of five months.

This year, 23 investigations were completed, of which 4% were closed, 26% were closed with guidance or admonishment from the PCC, and 70% were referred to the Discipline Committee.

Tribunal Sanctions

Sanctioning professional misconduct is critical to protecting the public, promoting confidence in the profession, deterring others from engaging in misconduct and maintaining high ethical standards.

As part of our disciplinary process, a member under discipline may be ordered to repay to CPA Ontario a portion of the cost of the investigation and discipline proceedings so the financial burden is not borne solely by the membership at large. A requirement to repay costs is not a penalty or sanction.

During the past year, 26 discipline/settlement cases were completed.

Almost half of the discipline/settlement proceedings were associated with assurance standards and audit quality. In addition to fines, these proceedings associated with professional standards resulted in three suspensions, four practice restrictions, and one revocation of membership, as well as three practice supervision orders.

Tribunal Outcomes

	FY25	FY24*	FY23
Number of Proceedings Concluded	26	33	17
Sanctions			
Fines	\$742,000	\$2,415,000	\$322,500
Suspensions	8	5	2
Revocations	8	12	7
Practice Restrictions	4	9	6
Costs Ordered	\$545,283	\$1,793,020	\$237,955

^{*} Contributing to the increase in overall fines and costs in FY24 were significant outcomes from settlements with two firms.

Nature of Cases

46%

Professional standards and competence, including audit quality

15%

Non-cooperation

39%

Profession's reputation

Court Proceedings – Unauthorized Practice

Unregistered and unlicensed foreign accounting firms operating in Ontario do so without our critical regulatory oversight that ensures public protection and confidence in public accounting. CPA Ontario prosecuted BF Borgers CPA PC and Ben Borgers of Lakewood, Colorado for offences under the Chartered Professional Accountants of Ontario Act, 2017 and the Public Accounting Act, 2004. Borgers and the Firm pleaded guilty to engaging in public accounting work in Ontario, including performing the audit of a reporting issuer, without appropriate registration and licensing.

The Order of the Ontario Court of Justice required the Firm and Borgers to pay total fines of \$55,000 to the Government of Ontario and \$15,000 to CPA Ontario in respect of its investigation and prosecution costs, and places both on probation for two years.

In addition, CPA Ontario concluded the prosecution of two individuals in provincial court for various registration and licensing offences, resulting in total fines and costs of \$45,000. In both cases, two-year probation orders were also obtained.

Appendix A

Appendix A

Summary of Disciplinary Actions

MAYADA A. ANIS (1985, Etobicoke)

Revoked CPA, CA

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Conduct: The Member failed to maintain the good reputation of the profession and its

ability to serve the public interest by misappropriating over \$1.3 million from the company she worked at and committing multiple acts of dishonesty

resulting in a contempt order by the Superior Court of Justice.

Finding: On April 5, 2024, the Member was found to have committed professional

misconduct by breaching Rule 201.1 of the Code.

Sanction: • Reprimand

• \$75,000 fine

Revocation of membership

Notice to all members of CPA Ontario, all provincial CPA bodies, and the public

Newspaper publication

Costs: \$4,700

Discipline File

GURMEET ARORA, CPA, CGA (1993, Scarborough)

Settlement Agreement

Conduct:

The member failed to perform his professional work in accordance with the generally accepted standards of practice of the profession contrary to Rule 206.1 of the Code. With respect to the Quality Assurance Manual, the member failed to perform his professional services in accordance with generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code.

Decision:

On June 28, 2024, the Discipline Committee approved the Settlement Agreement, dated May 15, 2024.

Terms:

- \$10,000 fine
- Revocation of Public Accounting Licence
- Practice restriction, prohibiting him from performing any assurance engagements
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- Newspaper publication
- \$17,500 costs

Settlement File

DANIEL DIAMOND, CPA, CA (2009, Thornhill)

Rule(s): Rule 104.1 – Requirement to co-operate

Rule 202.2 – Requirement to not allow one's professional or business judgment to be compromised by bias, conflict of interest or the undue

influence of others.

Rule 206.1 – Compliance with professional standards

Conduct:

During an audit, the member allowed his professional judgment to be compromised contrary to Rule 202.2 of the Code. He also failed to perform his professional work in accordance with the generally accepted standards of practice of the profession and failed to cooperate with the processes of CPA Ontario, contrary to Rules 206.1 and 104.1 of the Code.

Finding:

On July 18, 2024, the member was found to have committed professional misconduct by breaching Rules 104.1, 202.2 and 206.1 of the Code.

Sanction:

- \$75,000 fine
- Suspension of membership and Public Accounting Licence for 9 months
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- Newspaper publication

Costs: \$35,000

Discipline File

STEPHEN A. DIAMOND, CPA, CGA (1982, Toronto)

Settlement Agreement

Conduct:

The member failed to perform his professional work in accordance with the generally accepted standards of practice of the profession contrary to Rule 206.1 of the Code.

Decision:

On June 28, 2024, the Discipline Committee approved the Settlement Agreement, dated April 9, 2024.

Terms:

- \$12,000 fine
- Surrender of Public Accounting Licence
- Practice restriction, prohibiting him from carrying out any assurance engagements
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, and all provincial CPA bodies, and the public
- Newspaper publication
- \$20,000 costs

Settlement File

ROBERT DIMECH (2014, Mississauga)

Revoked CPA, CMA

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Rule 104.2 - Requirement to cooperate

Conduct:

On or about March 8, 2024, Dimech was convicted of the criminal offence of fraud over \$5,000, and thereby failed to act in a manner which will maintain the good reputation of the profession and its ability to serve the public interest. In addition, Dimech failed to cooperate with the regulatory process of CPA Ontario by failing to respond to correspondence from a Standards Enforcement officer and by providing forged medical documentation to CPA Ontario in response to the complaint filed against him.

Finding:

On March 18, 2025, Dimech was found to have committed professional misconduct by breaching Rules 201.1 and 104.2 of the Code.

Sanction:

- \$50,000 fine
- Revocation of membership
- Notice to all members of CPA Ontario, all provincial CPA bodies and to the public
- Newspaper publication

Costs:

\$3,300

Discipline File

SUMUDU B. GUNATHILAKA, CPA, CMA (2013, Brampton)

Rule(s): Rule 104.2 – Requirement to co-operate

Conduct: The member failed to cooperate with the regulatory processes of CPA

Ontario, contrary to Rule 104.2 of the Code.

Finding: On February 28, 2025, the member was found to have committed

professional misconduct by breaching Rule 104.2 of the Code.

Sanction: • \$5,000 fine

Notice to all members of CPA Ontario, all provincial CPA bodies, and

the public

Costs: \$2,800

SALAH HASSAN, CPA, CGA (1995, Woodbridge)

Rule(s): Rule 104.2 – Requirement to co-operate

Conduct: The member failed to cooperate with the regulatory process of CPA

Ontario by failing to respond to correspondence from a Standards

Enforcement Officer.

Finding: On September 12, 2024, the member was found to have committed

professional misconduct by breaching Rule 104.2 of the Code.

Sanction: • \$5,000 fine

Order to cooperate with the regulatory processes of CPA Ontario

Notice to all members of CPA Ontario, all provincial CPA bodies, and

the public

Costs: \$8,500

GARETT HAZELWOOD, CPA, CGA (2005, Sunderland)

Rule(s):

Rule 101.1 (b) – Compliance with governing legislation, bylaws, regulations

and the Code

Rule 104 - Requirement to co-operate

Rule 104.2 – Requirement to reply promptly

Rule 206.1 – Compliance with professional standards

Conduct:

The member performed functions ordinarily performed by an engagement partner without holding a valid Public Accounting Licence, contrary to Rule 101.1 (b) of the Code. He also failed to co-operate with the regulatory processes of CPA Ontario and failed to perform his professional work in accordance with the generally accepted standards of practice of the profession, contrary to Rules 104, 104.2 and 206.1 of the Code.

Finding:

On July 25, 2024, the member was found to have committed professional misconduct by breaching Rules 101.1 (b), 104, 104.2, and 206.1 of the Code.

Sanction:

- \$30,000 fine
- Suspension of membership for 12 months
- Practice restriction, prohibiting him from carrying out any assurance engagements
- Barred from ever holding a Public Accounting Licence
- Requirement to co-operate with the information and document requests of Standards Enforcement
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public

Costs: \$25,000

Discipline Files (D-23-015) and (D-24-012)

JEFFREY R.G. JACKSON, CPA, CA (1984, Etobicoke)

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Rule 206.1 – Compliance with professional standards

Conduct: While engaged to perform an audit, audit engagement and a review

engagement, the member failed to maintain the good reputation of the profession and perform his professional work in accordance with the generally accepted standards of practice of the profession contrary to

Rules 201.1 and 206.1 of the Code.

Finding: On July 10, 2024, the member was found to have committed professional

misconduct by breaching Rule 201.1 and 206.1 of the Code.

Sanction: • \$20,000 fine

 Practice restriction, permanently prohibiting him from accepting engagements of reporting issuers

• Supervised practice for 18 months

Reinvestigation

• Professional development courses

 Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public

Newspaper publication

Costs: \$32,400

LAERT KASAJ (2015, Thornhill)

Revoked CPA, CGA

Rule(s): Rule 103 – False or misleading applications

Rule 201.1 – Maintenance of the good reputation of the profession

Conduct: The member failed to act in a manner which would maintain the good

reputation of the profession and serve the public interest as a result of being convicted of aiding and abetting the importation of drugs into Australia. The member also made false and misleading statements to CPA Ontario about

this conviction when applying for readmission to membership.

Finding: On May 22, 2024, the member was found to have committed professional

misconduct by breaching Rules 103 and 201.1 of the Code.

Sanction: • \$40,000 fine

Revocation of membership

 Notice to all members of CPA Ontario, all provincial bodies, and the public

Newspaper publication

Costs: \$15,000

XIANGDONG (SHELDON) LU, CPA, CMA (2007, Mississauga)

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Rule 205 – False or misleading documents and oral representations

Conduct: During the negotiation of a sale of a business, the member failed to act

in a manner which would maintain the good reputation of the profession and serve the public interest and made or associated with statements and

representations that he knew, or should have known, were false

or misleading.

Finding: On April 22, 2024, the member was found to have committed professional

misconduct by breaching Rules 201.1 and 205 of the Code.

Sanction: •

Reprimand

\$15,000 fine

• Suspension of membership for a period of 12 months

Professional development courses

Notice to all members of CPA Ontario, all provincial bodies, and

the public

Costs: \$26,000

CHRISTOPHER MARTIN, CPA, CA (2000, Woodstock)

Settlement Agreement

Conduct:

The member failed to perform his professional work in accordance with the generally accepted standards of practice of the profession, contrary to Rule 206.1 of the Code, with respect to two assurance files. The member also failed to maintain the good reputation of the profession, contrary to Rule 201.1 of the Code, when he modified or completed the aforementioned assurance files after being notified that those files had been selected for practice inspection.

Decision:

On January 15, 2025, the Discipline Committee approved the Settlement Agreement, dated November 18, 2024.

Terms:

- \$10,000 fine
- Professional development courses
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- \$14,500 costs

SUSAN L. MAYNARD (1987, Grimsby)

Revoked CPA, CA

Settlement Agreement

Conduct:

The member failed to perform her professional work in accordance with the generally accepted standards of practice of the profession with respect to the audits of the financial statements of an investment fund manager and three related funds over a period of four years, contrary to Rule 206.1 of the Code.

Decision:

On December 2, 2024, the Discipline Committee approved the Settlement Agreement, dated September 5, 2024.

Terms:

- \$75,000 fine
- · Revocation of membership
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- Newspaper publication
- \$40,000 costs

ATUL MEHRA, CPA, CA (2003, Markham)

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Rule 206.1 – Compliance with professional standards

Conduct: While engaged to perform an audit the member failed to maintain the

good reputation of the profession and perform his professional work in accordance with the generally accepted standards of practice of the

profession contrary to Rules 201.1 and 206.1 of the Code.

Finding: On October 1, 2024, the member was found to have committed

professional misconduct by breaching Rules 201.1 and 206.1 of the Code.

Sanction: • \$15,000 fine

• Supervised practice for 18 months

Reinvestigation

 Notice to all members of CPA Ontario, all provincial CPA bodies, and the public

Newspaper publication

Costs: \$20,000

DEEPAK MEHTA (Student)

Rule(s): Rule 103 – Association with false and misleading information

Rule 401 – Maintenance of good reputation of the profession

Rule 402 - Requirement to co-operate

Conduct:

The student made or associated with information regarding his qualifying experience and hours which he knew or should have known was false and misleading, failed to maintain the good reputation of the profession and its ability to serve the public interest, and failed to co-operate with the regulatory process of CPA Ontario.

Finding:

On September 18, 2024, the student was found to have committed professional misconduct by breaching Rules 103, 401, and 402 of the CPA Ontario Student Code of Conduct.

Sanction:

- \$10,000 fine
- Suspension of student membership for 6 months
- Notice to all members of CPA Ontario, the Admission and Registration Committee, all provincial CPA bodies, and the public

Costs: \$10,000

Discipline File

47

SAURAB MEHTA, CPA, CMA (2014, Oakville)

Rule(s): Rule 104 – Requirement to co-operate

Rule 201.1 – Maintenance of the good reputation of the profession Rule 205 – False or misleading documents and oral representations

Conduct:

The member failed to cooperate with the regulatory processes of CPA Ontario, failed to maintain the good reputation of the profession and serve the public interest, and signed or associated themselves with information they knew, or should have known, was false and misleading, contrary to Rules 104, 201.1 and 205 of the Code.

Finding:

On December 18, 2024, the member was found to have committed professional misconduct by breaching Rules 104, 201.1 and 205 of the Code.

Sanction:

- \$20,000 fine
- Suspension of membership for 6 months
- Professional development courses
- Notice to all members of CPA Ontario, all provincial CPA bodies, and the public

Costs: \$20,00

KISHAN MOOLJEE, CPA, CA (2003, Etobicoke)

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Rule 206.1 – Compliance with professional standards

Conduct: The member failed to conduct themselves in a manner that will maintain

the good reputation of the profession and serve the public interest. He failed to perform his professional services in accordance with generally accepted standards of practice of the profession contrary to Rules 201.1

and 206.1 of the Code.

Finding: On December 3, 2024, the member was found to have committed

professional misconduct by breaching Rules 201.1 and 206.1 of the Code.

Sanction: • \$15,000 fine

• Supervised practice for 18 months

Reinvestigation

 Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public

Newspaper publication

Costs: \$20,000

SEIJA MOORE (nee MAKELAINEN) (2013, Thunder Bay)

Revoked CPA, CA

Rule(s): Rule 201.1 – Maintenance of the good reputation of the profession

Conduct: In the period of June 12, 2023 to December 31, 2023, Moore (nee

Makelainen) was convicted of the criminal offences of sexual interference and sexual exploitation, and thereby failed to act in a matter which will maintain the good reputation of the profession and its ability to serve the

public interest.

Finding: On February 20, 2025, Moore (nee Makelainen) was found to have

committed professional misconduct by breaching Rule 201.1 of the Code.

Sanction: • Reprimand

• \$20,000 fine

· Revocation of membership

 Notice to all members of CPA Ontario, all provincial CPA bodies and to the public

Newspaper publication

Costs: \$11,000

JOHN RYAN (1983, Puslinch)

Revoked CPA, CGA

Rule(s): Rule 104.2 – Requirement to co-operate

Rule 201.1 – Maintenance of the good reputation of the profession

Rule 202.1 – Performing professional services with integrity and due care

Conduct: The member failed to cooperate with the regulatory processes of CPA

Ontario, failed to act in a manner which maintained the good reputation

of the profession, and failed to perform professional services with integrity and due care, contrary to Rules 104.2, 201.1, and 202.1 of

the Code.

Finding: On August 15, 2024, the member was found to have committed

professional misconduct by breaching Rules 104.2, 201.1 and 202.1 of

the Code.

Sanction: • Written reprimand

• \$60,000 fine

· Revocation of membership

Notice to all members of CPA Ontario, all provincial CPA bodies, and

the public

Newspaper publication

Costs: \$55,000

SYED A. A. SHAH, CPA, CGA (2018, Mississauga)

Rule(s): Rule 101 – Compliance with governing legislation, bylaws, regulations and

the Code

Rule 208.3 - Confidentiality of information

Conduct: The member failed to protect the confidential information of his clients

and former clients, and he provided accounting services to the public through entities not registered with CPA Ontario, contrary to Rules 208.3

and 101 of the Code.

Finding: By the Decision and Order dated November 6, 2024, the member was

found to have committed professional misconduct by breaching Rules 101

and 208.3 of the Code.

Sanction: • \$30,000 fine

Professional development courses

Notice to all members of CPA Ontario, all provincial CPA bodies, and

the public

Costs: \$33,583

ABDUL FAREED SHEIK, CPA, CA (2007, Brampton)

Rule(s): Rule 206.1 – Compliance with professional standards

Conduct: The member failed to perform his professional work in accordance with

the generally accepted standards of practice of the profession, contrary

to Rule 206.1 of the Code.

Finding: On February 7, 2025, the member was found to have committed

professional misconduct by breaching Rule 206.1 of the Code.

Sanction: • \$10,000 fine

• Supervised practice for 18 months

Reinvestigation

 Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public

Costs: \$26,500

SHELLEY S. SHIFMAN (1975, North York)

Revoked CPA, CA

Rule(s): Rule 104 – Requirement to co-operate

Rule 201.1 – Maintenance of the good reputation of the profession

Rule 209.1 - Borrowing from clients

Conduct:

The member engaged in prohibited borrowing from two clients. He failed to maintain the good reputation of the profession and serve the public interest when, regarding the first loan, he failed to take responsible steps to ensure the client obtained independent advice and failed to repay the loan, and regarding the second loan, he failed to document the loan, issued a cheque for which he knew there were insufficient funds, and failed to repay the loan. He also failed co-operate with the regulatory process of CPA Ontario.

Finding:

On May 16, 2024, the member was found to have committed professional misconduct by breaching Rules 104, 201.1, and 209.1 of the Code.

Sanction:

- \$50,000 fine
- Revocation of membership
- Notice to all members of CPA Ontario, all provincial bodies, and the public
- Newspaper publication

Costs: \$25,000

Discipline File (<u>D-23-033</u>) and (<u>D-24-009</u>)

RITA SHRIMALI, CPA, CA (2007, Mississauga)

Settlement Agreement

Conduct:

The member failed to act in a manner that maintained the good reputation of the profession and serve the public interest in backdating review engagement working paper signoffs and failed to perform professional services with integrity and due care, contrary to Rules 201.1 and 202.1 of the Code.

Decision:

On March 14, 2025, the Discipline Committee approved the Settlement Agreement, dated January 21, 2025.

Terms:

- \$10,000 fine
- Professional development courses
- Notice to all members of CPA Ontario, all provincial CPA bodies, and the public
- \$11,000 costs

JATIN SINGH (Student)

Rule(s): Rule 103 – Association with false and misleading information

Rule 401 – Maintenance of the good reputation of the profession

Rule 402 - Requirement to co-operate

Conduct:

The student created or associated themselves with information which they knew or should have known was false or misleading, failed to act at all times in a manner that will maintain the good reputation of the profession and serve the public interest, and failed to co-operate with the regulatory processes of CPA Ontario, contrary to Rules 103, 401, and 402 of the CPA Ontario Student Code of Conduct.

Finding:

On January 17, 2025, the student was found to have committed professional misconduct by breaching Rules 103, 401, and 402 of the CPA Ontario Student Code of Conduct.

Sanction:

- \$10,000 fine
- Suspension of student membership for 6 months
- Notice to all members of CPA Ontario, all provincial CPA bodies, and the public

Costs: \$11,000

CHANDER KANT SUDAN, CPA, CA

Settlement Agreement

Conduct:

The member failed to act in a manner that maintained the good reputation of the profession and serve the public interest in backdating signoffs on working papers after receiving notice they would be the subject of practice inspection, and failed to perform his professional work in accordance with the generally accepted standards of practice of the profession, contrary to Rules 201.1 and 206.1 of the Code.

Decision:

On March 14, 2025, the Discipline Committee approved the Settlement Agreement, dated January 20, 2025.

Terms:

- \$20,000 fine
- Suspension of membership and Public Accounting Licence for 4 months
- Professional development courses
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- Newspaper publication
- \$17,500 costs

MIKE C. ZENTENO, CPA, CA (2002, Markham)

Settlement Agreement

Conduct:

The member failed to perform his professional work in accordance with the generally accepted standards of practice of the profession, including while engaged to perform the audit of three related funds, contrary to Rule 206.1 of the Code.

Decision:

On December 2, 2024, the Discipline Committee approved the Settlement Agreement, dated October 7, 2024.

Terms:

- \$50,000 fine
- 6-month suspension of membership and Public Accounting License
- Notice to all members of CPA Ontario, the Public Accounting Standards Committee, all provincial CPA bodies, and the public
- Newspaper publication
- \$40,000 costs

Appendix B

Appendix B

Summary of Good Character Matters

If the Registrar is not satisfied that an applicant for registration as a student or admission to membership has provided evidence of good character, or where an assessment of the applicant's credibility is required, the matter is referred to the Admission and Registration Committee for an oral hearing. The Public Accounting Licensing Board may also refer a person seeking a licence for a good character hearing.

N.D.

Reason for referral:

Conviction of criminal harassment under the Criminal Code.

Outcome:

On March 7, 2025, the Tribunal found the Applicant to be of good character, that they were remorseful, had engaged in therapy, spent hundreds of hours volunteering and giving back to their community, and that there was a sufficient passage of time since the misconduct. The tribunal directed the Registrar to admit the Applicant as a member of CPA Ontario.

Good Character File

Appendix C

Appendix C

Regulatory Committees

Public Accounting Standards Committee

The Public Accounting Standards Committee (PASC) maintains the Public Accounting Standards that guide the regulation of licensed public accountants in Ontario, as well as any other instruments referred to in the <u>Public Accounting Act</u>, 2004 or relating to public accounting.

The PASC reviews, provides advice on, and recommends to CPA Ontario Council the adoption of any proposed public accounting-related amendments to CPA Ontario regulatory instruments.

Read more about CPA Ontario's oversight of public accounting in our 2024 report <u>Protecting the Foundation of Canada's Capital Markets: CPA Ontario's Oversight of Public Accounting.</u>

Public Accounting Licensing Board

The Public Accounting Licensing Board (PALB) is responsible for matters relating to public accounting licences, certificates of authorization and the practice of public accounting. This responsibility includes, but is not limited to, overseeing CPA Ontario's licensing standards responsibilities, functions and processes.

Further information on public accounting licensure is available in our Annual Report on Public Accounting.

Practice Inspection Committee

The Practice Inspection Committee (PIC) is made up of experienced volunteer members of the profession appointed by Council.

The Committee is responsible for administering the practice inspection program and for determining the outcome of inspections.

Professional Conduct Committee

Composed of seasoned volunteer professionals and public representatives, the Professional Conduct Committee (PCC) administers the CPA Code of Professional Conduct and the Student Code.

Operating solely as an investigative – not adjudicative – body, the PCC draws its conclusions exclusively from evidence gathered during inquiries, without formal hearings.

Discipline Committee

The Discipline Committee hears and decides allegations of professional misconduct made by the PCC and applications for a preliminary suspension prior to a finding of professional misconduct. It also reviews and approves settlement agreements.

Unless the Discipline Committee orders otherwise, hearings are open to the public.

