

**DEVELOPMENT FINANCE INSTITUTE
CANADA (DFIC) INC.**



**ANNUAL REPORT
ON THE ADMINISTRATION
OF THE
*ACCESS TO INFORMATION ACT***

1 APRIL 2024 – 31 MARCH 2025

Contents

| | |
|---|----|
| INTRODUCTION..... | 3 |
| ORGANIZATIONAL STRUCTURE | 3 |
| DELEGATION ORDER..... | 3 |
| PERFORMANCE 2024-2025..... | 3 |
| TRAINING AND AWARENESS PROGRAM..... | 4 |
| INSTITUTION SPECIFIC POLICIES, GUIDELINES AND PROCEDURES..... | 5 |
| PROACTIVE PUBLICATION | 5 |
| INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION | 8 |
| COMPLAINTS..... | 8 |
| MONITORING COMPLIANCE | 8 |
| APPENDIX A – DELEGATION OF AUTHORITY..... | 10 |

INTRODUCTION

The purpose of the *Access to Information Act* (“Act”) is to enhance the accountability and transparency of federal institutions to promote an open and democratic society and enable public debate on the conduct of those institutions.

Development Finance Institute Canada (DFIC) Inc. (“FinDev Canada”) is a crown corporation and wholly owned subsidiary of Export Development Canada (EDC). FinDev Canada is Canada’s bilateral Development Finance Institution (DFI), supporting development through the private sector. FinDev Canada provides financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to promote sustainable and inclusive growth in Latin America and the Caribbean, Sub-Saharan Africa and the Indo-Pacific region, aligned with the Sustainable Development Goals (SDGs) and Paris Agreement commitments. FinDev Canada targets development objectives in three impact areas: climate and nature action, gender equality and market development. FinDev Canada’s services are directed towards three sectors: the financial industry; agribusiness, forestry and value chains; and sustainable infrastructure. FinDev Canada does not have any subsidiaries, operational or non-operational.

This report is prepared and tabled in Parliament in accordance with section 94 of the Act.

ORGANIZATIONAL STRUCTURE

FinDev Canada relies on EDC’s Privacy and Information Risk (“P&IR”) Team to administer and respond to requests made under the Act. The P&IR Team is part of the Compliance and Ethics Group. The P&IR Team has, among other responsibilities, primary responsibility for administering the *Privacy Act* and the *Access to Information Act* and is responsible for responding to requests submitted to EDC and FinDev Canada under these Acts. Throughout the reporting period, the team was comprised of 6 full-time employees, with 2 employees dedicated to Access to Information. The team was overseen by the Director, Ethics, Privacy and Information Risk, who reported to the Chief Compliance and Ethics Officer, who in turn reported to the Chief Executive Officer of FinDev Canada.

FinDev Canada has an agreement in place, entered into pursuant to section 96 of the Act, for the receipt of access to information services provided by EDC.

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the Act, see the section “**Proactive Publication under Part 2 of the Act**”, below.

DELEGATION ORDER

A copy of the delegation order that was made pursuant to section 95(1) of the Act and was in effect at the end of the reporting period is attached at Appendix A.

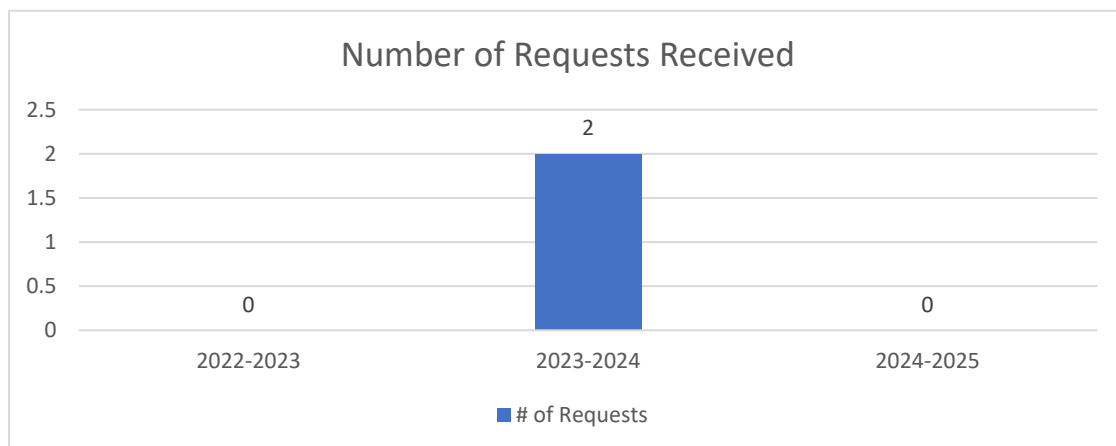
PERFORMANCE 2024-2025

Below is an overview of key data on FinDev Canada’s performance in administering Part 1 of the Act during the reporting period (April 1, 2024 – March 31, 2025).

No new requests for information were received during the reporting period.

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- No requests were closed during the reporting period.
- As of the last day of the reporting period, there was one active request, which was received in the 2019-2020 reporting period and is outside of the legislated timelines.
- As of the last day of the reporting period, there were no active complaints.
- One consultation request from another government institution was received during the reporting period. However, this request was carried over into the 2025-2026 reporting period and, therefore, no consultation requests were closed.

FinDev Canada experienced a decrease in the number of requests received under the Act compared to the previous period. The chart below shows the trend for the past three reporting periods.



TRAINING AND AWARENESS PROGRAM

During the reporting period, FinDev Canada maintained its commitment to mandatory privacy and access training for all new employees. This was delivered through a structured e-learning module, which includes narrated content, interactive slides, and assessment questions to reinforce learning outcomes.

New employees must complete the training upon commencement of their employment. Completion is tracked automatically in the learning management system. Leaders are responsible for ensuring that employees fulfill the mandatory privacy and access training requirements and promote privacy and access awareness initiatives.

The P&IR team participated in a Compliance and Ethics “Gallery Walk” presentation. This event provided FinDev employees with the opportunity to meet the team and gain a deeper

understanding of their privacy and access obligations. The Gallery Walk featured informative displays, interactive sessions, and direct engagement with P&IR Team members. This initiative contributed to a culture of compliance and helped to ensure that all employees are well-informed about their responsibilities.

INSTITUTION SPECIFIC POLICIES, GUIDELINES AND PROCEDURES

During the reporting period, FinDev Canada did not implement any new or revised institution-specific policies, guidelines, procedures related to access to information, or related to proactive publication requirements under Part 2 of the Act.

PROACTIVE PUBLICATION

The table below identifies which proactive publication requirements apply to FinDev Canada and provides associated information.

Proactive Publication Requirements Table

| Legislative Requirement | Section of ATIA | Publication Timeline | Does requirement apply to your institution? (Y/N) | Internal group(s) or position(s) responsible for fulfilling requirement | % of proactive publication requirements published within legislated timelines | Link to web page where published |
|--|-----------------|--|---|---|---|--|
| Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i> | | | | | | |
| Travel Expenses | 82 | Within 30 days after the end of the month of reimbursement | Y | EDC's Costing Team | 100 | Transparency Policy and Approach Development Finance Institute Canada |
| Hospitality Expenses | 83 | Within 30 days after the end of the month of reimbursement | Y | EDC's Costing Team | 100 | Transparency Policy and Approach Development Finance Institute Canada |
| Reports tabled in Parliament | 84 | Within 30 days after tabling | Y | EDC's Privacy and Information Risk Team | 100 | Access to information and privacy Development Finance Institute Canada |

| Apply to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the <i>Financial Administration Act</i> | | | | | | |
|---|-------|--|---|--|--|--|
| Contracts over \$10,000 | 86 | Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter | N | | | |
| Grants & Contributions over \$25,000 | 87 | Within 30 days after the quarter | N | | | |
| Packages of briefing materials prepared for new or incoming deputy heads or equivalent | 88(a) | Within 120 days after appointment | N | | | |
| Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office | 88(b) | Within 30 days after the end of the month received | N | | | |
| Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament | 88(c) | Within 120 days after appearance | N | | | |
| Applies to government institutions that are departments named in Schedule I to the <i>Financial Administration Act</i> or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer) | | | | | | |
| Reclassification of positions | 85 | Within 30 days after the quarter | N | | | |
| Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office) | | | | | | |

| | | | | | | |
|--|-------|--|---|--|--|--|
| Packages of briefing materials prepared by a government institution for new or incoming ministers | 74(a) | Within 120 days after appointment | N | | | |
| Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office | 74(b) | Within 30 days after the end of the month received | N | | | |
| Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December | 74(c) | Within 30 days after last sitting day of the House of Commons in June and December | N | | | |
| Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament | 74(d) | Within 120 days after appearance | N | | | |
| Travel Expenses | 75 | Within 30 days after the end of the | N | | | |

| | | | | | | |
|--|----|--|---|--|--|--|
| | | month of reimbursement | | | | |
| Hospitality Expenses | 76 | Within 30 days after the end of the month of reimbursement | N | | | |
| Contracts over \$10,000 | 77 | Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter | N | | | |
| Ministers' Offices Expenses Note: This consolidated report is currently published by TBS on behalf of all institutions. | 78 | Within 120 days after the fiscal year | N | | | |

INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

FinDev Canada did not implement any new initiatives or projects to improve access to information during the reporting period.

COMPLAINTS

During the reporting period, FinDev Canada did not receive any new complaints under the Act, nor did it close any complaints.

MONITORING COMPLIANCE

FinDev Canada uses AccessPro Suite by CSDC Systems Inc. to manage all requests received under the Act. The software has a dashboard function that enables monitoring of the status and time taken to process access to information requests.

To ensure FinDev Canada supports the right of public access to information in contracts and information sharing agreements, our standard contractual templates with vendors and service providers explicitly confirm that FinDev Canada (or the other party, where applicable) may be required to disclose information under applicable law, including the Act. This promotes transparency and sets realistic expectations regarding confidentiality.

Regarding the proactive publication requirements outlined in Part 2 of the Act, the P&IR Team is responsible for fulfilling the obligation of publishing reports that are tabled in Parliament, as specified in section 84. Meanwhile, the Costing Team within the EDC Finance Group is tasked with ensuring that FinDev Canada complies with its responsibilities under sections 82 and 83, which pertain to the publication of travel and hospitality expenses.

To ensure compliance with Part 2 of the Act, travel and hospitality expenses are approved through a centralized expense system. This system generates a general ledger from which the relevant expenses are extracted for publication.

APPENDIX A – DELEGATION OF AUTHORITY

Delegation Order for the *Access to Information Act* and *Privacy Act*

FinDev Canada


The Chief Executive Officer of FinDev Canada, in accordance with section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegates the powers, duties and functions of the head of the institution under those Acts to the persons holding the positions set out in the table below (or equivalent positions under future designations), including those occupying these positions on an acting basis. A description of the powers, duties and functions is set out in Schedule A. This delegation supersedes all previous delegations.

Delegation of Authority Table: Powers, Duties, and Functions

| Position | <i>Access to Information Act</i> & Regulations | <i>Privacy Act</i> & Regulations. |
|---|--|---------------------------------------|
| Chief Compliance & Ethics Officer (EDC) | Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4) | Full authority, except: Section 72(4) |
| Director, Ethics, Privacy & Information Risk (EDC) ¹ | Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4) | Full authority, except: Section 72(4) |

Chief Executive Officer

Name: LORI KERR

Signature: 

Date: 01-02-2025

¹ The Delegation Order also serves to appoint the Director, Ethics, Privacy & Information Risk to the role of Access to Information & Privacy (ATIP) Coordinator for Treasury Board compliance purposes.

Schedule A – Description of Powers, Duties, and Functions

Access to Information Act

| | |
|-----------------|--|
| 4(2.1) | Responsibility of government institutions |
| 6.1(1) | Reasons for declining to act on request |
| 6.1(1.3) | Notice of suspension |
| 6.1(1.4) | Notice of end of suspension |
| 6.1(2) | Notice of decision to decline to act on request |
| 7 | Notice where access requested |
| 8(1) | Transfer of request |
| 9(1) | Extension of time limits |
| 9(2) | Notice of extension to Information Commissioner |
| 10(1) | Where access is refused |
| 10(2) | Existence of a record not required to be disclosed |
| 11(2) | Waiver of fee |
| 12(3)(b) | Access to record in alternative format |
| 13 | Exemption - Information obtained in confidence |
| 14 | Exemption - Federal-provincial affairs |
| 15 | Exemption - International affairs and defense |
| 16 | Exemption - Law enforcement and investigations |
| 16.5 | Exemption - Public Servants Disclosure Protection Act |
| 17 | Exemption - Safety of individuals |
| 18 | Exemption - Economic interests of Canada |
| 18.1 | Exemption - Economic interests of certain government institutions |
| 19 | Exemption - Personal information |
| 20 | Exemption - Third party information |
| 21 | Exemption - Operations of government |
| 22 | Exemption - Testing procedures, tests and audits |
| 22.1 | Exemption - Internal audits |
| 23 | Exemption - Protected information - solicitors, advocates and notaries |
| 23.1 | Exemption - Protected information - patents and trademarks |
| 24(1) | Exemption - Statutory prohibitions against disclosure |
| 25 | Severability |
| 26 | Refusal of access if information is to be published |
| 27 | Notice to third parties |
| 28(1)(b) | Representation of third party and decision |
| 28(4) | Disclosure of record |
| 35(2)(b) | Right to make representations |
| 37(4) | Access to be given |
| 41(2) | Review by Federal Court - government institution |
| 43(2) | Service or notice |
| 44(2) | Notice to person who requested record |
| 52(2)(b) | Special rules for hearings |
| 52(3) | <i>Ex parte</i> representations |

| | |
|--------------|---|
| 94(1) | Prepare a report on the administration of the Act |
| 94(4) | Provide a copy of the report to the designated Minister |

Access to Information Regulations

| | |
|-------------|---------------------------------|
| 5 | Procedures |
| 6(1) | Transfer of request |
| 7(2) | Fees |
| 7(3) | Fees |
| 8 | Access |
| 8.1 | Limitation in Respect of Format |

Privacy Act

| | |
|-----------------|---|
| 8(2)(j) | Disclosure for research purposes |
| 8(2)(m) | Disclosure in public interest or in interest of the individual |
| 8(4) | Copies of requests under paragraph 8(2)(e) to be retained |
| 8(5) | Notice of disclosure under paragraph 8(2)(m) |
| 9(1) | Record of disclosures to be retained |
| 9(4) | Consistent uses |
| 10 | Personal information to be included in personal information banks |
| 14 | Notice where access requested |
| 15 | Extension of time limits |
| 16(1) | Notice where access is refused |
| 16(2) | Notice where personal information does not exist |
| 17(2)(b) | Language of access |
| 17(3)(b) | Access to personal information in alternative format |
| 18(2) | Exemption (exempt bank) – Disclosure may be refused |
| 19(1) | Exemption - Personal information obtained in confidence |
| 19(2) | Exemption – Where authorized to disclose |
| 20 | Exemption - Federal-provincial affairs |
| 21 | Exemption - International affairs and defence |
| 22 | Exemption - Law enforcement and investigation |
| 22.3 | Exemption – <i>Public Servants Disclosure Protection Act</i> |
| 23 | Exemption - Security clearances |
| 24 | Exemption - Individuals sentenced for an offence |
| 25 | Exemption - Safety of individuals |
| 26 | Exemption - Information about another individual |
| 27 | Exemption - Solicitor-client privilege |
| 27.1 | Exemption – Patents and trademarks |
| 28 | Exemption - Medical record |
| 31 | Notice of intention to investigate |
| 33(2) | Right to make representation |
| 35(1) | Findings and recommendations of the Privacy Commissioner (complaints) |

| | |
|-----------------|--|
| 35(4) | Access to be given |
| 36(3) | Report of findings and recommendations (exempt banks) |
| 37(3) | Report of findings and recommendations (compliance review) |
| 51(2)(b) | Special rules for hearings |
| 51(3) | <i>Ex parte</i> representations |
| 72(1) | Prepare report on administration of the Act |
| 72(1)(4) | Provide a copy of the report to the designated Minister |

Privacy Regulations

| | |
|--------------|--|
| 7 | Retention for two years |
| 9 | Reasonable facilities and time provided to examine personal information |
| 11(2) | Notification that correction to personal information has been made |
| 11(4) | Notification that correction to personal information has been refused |
| 13(1) | Disclosure of personal information relating to physical or mental health may be made to a qualified medical practitioner or psychologist for an opinion on whether to release information to the requestor |
| 14 | Disclosure of personal information relating to physical or mental health may be made to requestor in the presence of a qualified medical practitioner or psychologist |