DEVELOPMENT FINANCE INSTITUTE CANADA (DFIC) INC.

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

1 APRIL 2025 – 31 MARCH 2026

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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 3 employees dedicated to access to information. The team was overseen by the Director, Ethics, Privacy and Information Risk under delegation of authority from the CEO 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 groups and/or positions 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 UNDER PART 1 OF THE ACCESS TO INFORMATION ACT, 2025-2026

Below is an overview of key data on FinDev Canada's performance in administering Part 1 of the Act during the reporting period.

- No new requests for information were received during the reporting period.
- 1 request, carried over from a previous reporting period, was completed. It was completed in more than 365 days and outside legislated timelines. Records were disclosed in part.
- As of the last day of the reporting period, there were no active requests.
- As of the last day of the reporting period, there were no active complaints.
- 1 consultation request from another government institution, carried over from the previous reporting period, was completed within 31-60 days.

TRAINING AND AWARENESS PROGRAM

FinDev Canada maintained its commitment to mandatory privacy and access to information training during the year. This training is delivered through structured e-learning modules that include narrated content, interactive slides, and assessment questions to reinforce learning outcomes.

New employees must complete 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 for promoting privacy and access awareness within their teams.

A privacy and access refresher training was also launched for the first time during the reporting period. This mandatory e-learning module was delivered to all employees. Completion was tracked through the learning management system. Going forward, annual recurrent training will be updated and delivered to employees on a mandatory basis each year.

POLICIES, GUIDELINES AND PROCEDURES

During the reporting period, no new or revised institution-specific policies, guidelines, or procedures were implemented in relation to access to information or proactive publication requirements under Part 2 of the Act.

INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

EDC's P&IR Team is currently implementing a new case management system (AMANDA). This initiative remains a priority to improve case tracking, redaction practices, and reporting visibility.

SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

During the reporting period, FinDev Canada received no new complaints under the Act and did not conclude any complaints. As such, no issues or corrective actions were identified.

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 positions(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 *Access to Information Act*						
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 *Financial Administration Act*						
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	88(a)	Within 120 days after appointment	N			

materials prepared for new or incoming deputy heads or equivalent						
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 *Financial Administration Act* 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	74(b)	Within 30 days after the end of the month received	N			

prepared by a government institution for the minister, that is received by their office						
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 Common 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 month of reimbursement	N			
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	78	Within 120 days after the fiscal year	N			

Note: This consolidated report is currently published by TBS on behalf of all institutions.						

MONITORING COMPLIANCE

AccessPro Suite, developed by CSDC Systems Inc., is used to manage all requests received under the Act. The software has a dashboard function that enables ongoing monitoring of the request status and processing timelines. These metrics are reviewed through regular team oversight, including daily meetings and weekly reviews with EDC's Director, Ethics, Privacy and Information Risk.

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 required by section 84. The Costing Team within EDC's Finance Group is responsible for ensuring that FinDev Canada meets its obligations under sections 82 and 83, which pertain to the publication of travel and hospitality expenses.

To support 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	***Access to Information Act* & Regulations**	***Privacy Act* & 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: [signature]

Date: 04-02-2025

[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)	*Ex parte* 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 – *Public Servants Disclosure Protection Act*
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)	*Ex parte* 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