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

Export Development Canada

1 April 2025– 31 March 2026



Canada

EDC
TAKE ON THE WORLD

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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.

Export Development Canada ("EDC") is a crown corporation and an agent of His Majesty in Right of Canada with a mandate to support and develop trade between Canada and other countries and Canada's competitiveness in the international marketplace and to provide development financing and other forms of development support. EDC's mandate also includes supporting and developing domestic business, where requested by the Minister of International Trade and the Minister of Finance.

This report is prepared and tabled in Parliament in accordance with section 94 of the Act. For clarity, this report relates to EDC and also fulfills the reporting requirements of EDC's wholly owned non-operational subsidiary, Exinvest Inc. A separate report is prepared and tabled for EDC's wholly-owned operating subsidiary, Development Finance Institute Canada Inc. ("FinDev Canada").

ORGANIZATIONAL STRUCTURE

EDC's Privacy and Information Risk ("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 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, who reported to the Chief Compliance and Ethics Officer, who in turn reported to EDC's Senior Vice-President, Global Risk Management and Chief Risk Officer.

EDC has agreements in place, entered into pursuant to section 96 of the Act, for the provision of access to information services to FinDev Canada and Exinvest Inc.

For a breakdown of the groups 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 EDC's performance in administering Part 1 of the Act during the reporting period.

- EDC received 28 new requests for information under the Act.

- EDC completed 27 requests during the reporting period, of which 81% (22 of 27) were completed within legislated timelines.

- Of the 27 requests that were completed during the reporting period:
    - 11 were completed within 1-15 days;
    - 4 were completed within 16-30 days;
    - 4 were completed within 31-60 days;
    - 4 were completed within 61-120 days;
    - 1 was completed within 121-180 days;
    - 1 was completed within 181-365 days; and
    - 2 were completed in more than 365 days.

- Of the 27 requests that were completed, 12 required an extension. Of these:
    - 9 were extended pursuant to section 9(1)(a) (due to the large number of records required to be processed);
    - 11 were also extended under section 9(1)(b) (due to consultations being required to comply with the request that could not be completed within the original time limit);
    - 8 requests were extended under both sections 9(1)(a) and 9(1)(b);
    - 3 requests were extended and solely pursuant to section 9(1)(b); and
    - 0 requests were extended pursuant to section 9(1)(c).

- Of all requests completed, those for which records were "all disclosed" accounted for 15%, while those for which records were "disclosed in part" accounted for 37%. The remaining requests were abandoned, resulted in no records being identified, or involved records being fully exempted.

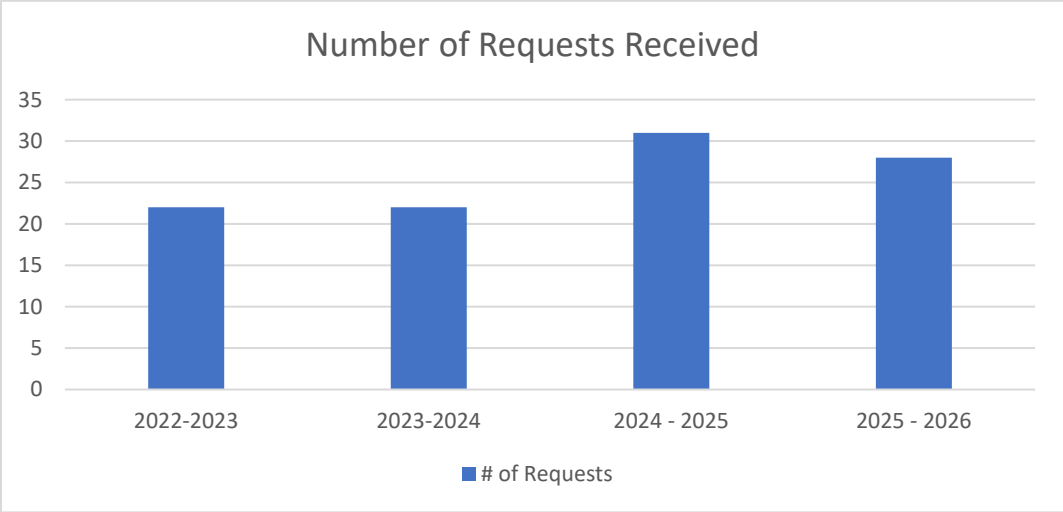
- As of the last day of the reporting period, 9 requests remained active. All of these requests were received during the 2025-2026 reporting period and were carried over to the next reporting period. All remained within the legislated timelines.

- As of the last day of the reporting period, there were no active complaints.

- During the reporting period, EDC completed 22 consultations for other government institutions regarding the release of records. Of those:

- 14 were completed within 1-15 days;
- 6 were completed within 16-30 days; and
- 2 were completed within 31-60 days.

EDC had a decrease in the number of requests received during the reporting period compared to the previous reporting period. The chart below shows the trend for the past 4 reporting periods.



TRAINING AND AWARENESS

EDC 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.

A total of 5 targeted training sessions were delivered to specific groups based on operational needs, including EDC's Singapore Branch, Shareholder Relations Team and the Environmental, Social and Governance Team.

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 to proactive publication requirements under Part 2 of the Act.

INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

EDC is currently implementing a new automated central processing system (AMANDA) to process requests under the Act. This initiative will improve operational efficiency, strengthen request tracking and reporting capabilities, support compliance with statutory timelines, and enhance the overall management of access requests.

SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

EDC received no new complaints during the reporting period. A total of 4 complaint investigations were concluded during the reporting period. Of these, 3 were discontinued by the Office of the Information Commissioner ("OIC") (including 1 which was abandoned by the requester), 1 was determined to be not well-founded by the OIC.

PROACTIVE PUBLICATION UNDER PART 2 OF THE ACT

The table below identifies which proactive publication requirements apply to EDC 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	Costing Team	100%	Travel and Hospitality | EDC

Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Costing Team	100%	Travel and Hospitality | EDC
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Privacy & Information Risk Team / Public Affairs & Int'l Relat. Team	100%	Corporate Reports | EDC Access to Information and Privacy | EDC
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 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	88(c)	Within 120 days after appearance	N			

committee of Parliament						
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 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 Common in June and December	N			
Packages of briefing materials prepared by a	74(d)	Within 120 days after appearance	N			

government institution for a minister's appearance before a committee of Parliament						
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 Note: This consolidated report is currently published by TBS on behalf of all institutions.	78	Within 120 days after the fiscal year	N			

MONITORING COMPLIANCE

EDC used AccessPro Case Management (APCM) Suite, developed by CSDC Systems Inc., 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. As noted above, EDC is currently implementing a new system (AMANDA) with transition to occur during the 2026-2027 reporting year.

In addition to regular team oversight through daily meetings, access compliance metrics, including response times, are a standing item in senior management reporting.

Regarding the proactive publication requirements outlined in Part 2 of the Act, the P&IR Team is responsible for publishing reports tabled in Parliament, as required by section 84. The Costing Team within EDC's Finance Group is responsible for ensuring that EDC 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*

Export Development Canada

The President & Chief Executive Officer of Export Development 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**
Senior Vice President (Global Risk Management) & Chief Risk Officer	Full authority, except: Sections 41(2), 52(2)(b), 94(4)	Full authority, except: Section 72(4)
Chief Compliance & Ethics Officer	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)
Director, Ethics, Privacy & Information Risk	Full authority, except: Sections 41(2), 52(2)(b), 52(3), 94(4)	Full authority, except: Section 72(4)
CEBA Call Centre Management	N/A	Authority limited to section 8(2)(m) only[1]

President & Chief Executive Officer

Name: Alison MacKinnell

Signature: Alison MacKinnell **Date:** 25 March 2025

[1] This delegation is for the purposes of enabling timely and informed decision-making in emergency situations. It is specific and limited to authority to making the determination disclosure is authorized in accordance with criteria defined for this purpose by the Director, Ethics, Privacy & Information Risk.

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(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