# Canada TMP Finance Ltd.

*Access to Information Act*

Annual Report to Parliament

April 1, 2025 to March 31, 2026

*October 2026*

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## Introduction

The *Access to Information Act* (Revised Statutes of Canada, Chapter A–1, 1985) (“the Act”) was proclaimed on July 1, 1983. The Act a gives Canadian citizens and permanent residents a broad right of access to information contained in government records, including Crown Corporations, subject to certain specific and limited exceptions.

This Annual Report to Parliament regarding the application of the Act is prepared and tabled in Parliament in accordance with section 94(1) of the Act and covers the period from April 1, 2025, to March 31, 2026.

Canada TMP Finance Ltd. (“TMP Finance” or "the Corporation") became subject to the *Access to Information Act* upon incorporation on May 28, 2018.

CANADA TMP FINANCE LTD. (TMP Finance) has the primary responsibility to provide financing to its subsidiary, Trans Mountain Corporation (TMC). TMC has a mandate to operate the Trans Mountain Pipeline and is responsible for construction and subsequent operation of the proposed West Coast Oil Pipeline under a new jointly owned company in partnership with Alberta Petroleum Marketing Commission (APMC), and Pembina Pipeline Corporation. CDEV fulfills its supervisory role as owner of TMC through an MOU which lays out areas of responsibility and accountability, including the responsibility for appointing the TMC Board. CDEV management is deeply involved in ensuring the financial health of TMC for the long-term goal of a successful monetization in due course.

TMP Finance is a wholly-owned subsidiary of the Canada Development Investment Corporation (“CDEV”) and has no employees. Day-to-day operations are administered by CDEV employees in Toronto, Ontario.

## Organizational Structure

TMP Finance is the parent company of TMC and reports to Parliament through the Minister of Finance. TMC has a corporate structure with approximately 700 employees led by a seasoned executive team.

Two full-time CDEV employees are dedicated to Access to Information and Privacy (“ATIP”) activities for CDEV and its subsidiaries on a part-time basis, (excluding TMC which has its own ATIP Coordinator and staff). The ATIP department consists of the ATIP Coordinator and one analyst. CDEV retains advice from external legal counsel and independent consultants as needed. CDEV currently has one independent ATIP consultant working approximately 0.25 FTEs.

Summaries of completed Act requests are published on the Open Government portal monthly. The ATIP Analyst is responsible for creating and publishing monthly request summaries and travel and hospitality expenses. Also, the Analyst posts reports tabled in Parliament (such as annual reports or corporate plan summaries) in a timely manner to respect the legislated timelines. The Chief Administrative Officer reviews and approves the monthly travel and hospitality disclosures, as well as the reports tabled in Parliament before they are published on the website. The ATIP Coordinator reviews and approves monthly Act summaries and Annual Reports before they are published.

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the Access to Information Act, see the section

“Proactive Publication under Part 2 of the ATIA”, below.

The Corporation is party to management service agreements with CDEV under section 96 of the Act.

### Delegation Order

The Delegation of Authority Order (Appendix A) is reviewed annually by the head of the organization. The authority to approve or deny the release of departmental information requested under the Act is shared by the General Counsel and Corporate Secretary and the ATIP Coordinator - as delegated by the President and Chief Executive Officer.

### Performance and Highlights of the 2025-2026 Statistical Report

During April 1, 2025 – March 31, 2026, no new requests under the under the Act were received. Since its incorporation in May 2018, TMP Finance has received no formal or informal requests and no consultations from other institutions.

No active requests are outstanding from previous reporting periods.

No active complaints are outstanding from previous reporting periods, and none were received during the current reporting period.

### Training and Awareness

CDEV management meets regularly with the ATIP office to discuss specific requests and consultations as required. Management is briefed on the status of files and reporting requirements on a regular basis. Summaries of formal and informal ATIP requests as well as consultations and complaints for CDEV and its subsidiaries are presented to the board of directors quarterly.

General ATIP training is provided to all new staff and directors of CDEV and subsidiaries. The sessions are structured into two parts, the first being a general information session and the second being an in-depth briefing targeted dominantly at the offices of primary interest.

Informal briefings, and one-on-ones, are scheduled as needed. The executive team is informed by email as soon as a new request is received.

### Policies, Guidelines, Procedures and Initiatives

There were no changes to policies, guidelines, procedures or technology relating to ATIA during the reporting period.

### Proactive Publication under Part 2 of the ATIA

CDEV is a Crown Corporation listed in Schedule III, Part II of the *Financial Administration Act.* CDEV is subject to proactive publication requirements pursuant to sections 82, 83 and 84 of the Act. Travel and Hospitality expenses are published within 30 days after the end of the month of reimbursement and reports tabled in Parliament are published within 30 days after tabling. These are published on CDEV’s website in both official languages (https://cdev.gc.ca/publications/). During the reporting period, the institution published 100% of the proactive publications requirements material within the legislated timelines.

Monthly summaries of completed requests under the Act are published on the Open Government website (https://open.canada.ca/en/search/ati) in accordance with the legislative timeline.

CDEV regularly tracks the Travel and Hospitality management expenses to allow for an accurate preparation of proactive disclosure.

CDEV's legislative requirements are as follows:

| 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 | Yes | Chief Administrative Officer; Manager, Operations & IT; Administrative Assistant | 100% | https://cdev.gc.ca/publications/ |
| Hospitality Expenses | 83 | Within 30 days after the end of the month of reimbursement | Yes | Chief Administrative Officer; Manager, Operations & IT; Administrative Assistant | 100% | https://cdev.gc.ca/publications/ |
| Reports tabled in Parliament | 84 | Within 30 days after tabling | Yes | Chief Administrative Officer; Vice President & Head of Communications; Associate, Communications | 100% | https://cdev.gc.ca/publications/ |
| **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<br>Q4: Within 60 days after the quarter | No | NA | NA | NA |
| Grants & Contributions over $25,000 | 87 | Within 30 days after the quarter | No | NA | NA | NA |
| Packages of briefing materials prepared for new or incoming deputy heads or equivalent | 88(a) | Within 120 days after appointment | No | NA | NA | NA |
| Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is | 88(b) | Within 30 days after the end of the month received | No | NA | NA | NA |

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| received by their office | | | | | | |
| 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 | No | NA | NA | NA |
| **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 | No | NA | NA | NA |
| **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 | No | NA | NA | NA |
| 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 | No | NA | NA | NA |
| 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 | No | NA | NA | NA |
| 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 | No | NA | NA | NA |

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| Travel Expenses | 75 | Within 30 days after the end of the month of reimbursement | No | NA | NA | NA |
| Hospitality Expenses | 76 | Within 30 days after the end of the month of reimbursement | No | NA | NA | NA |
| Contracts over $10,000 | 77 | Q1-3: Within 30 days after the quarter<br>Q4: Within 60 days after the quarter | No | NA | NA | NA |
| Ministers' Offices Expenses<br>Note: This consolidated report is currently published by TBS on behalf of all institutions. | 78 | Within 120 days after the fiscal year | No | NA | NA | NA |

## Initiatives and Projects to Improve Access to Information

In addition to traditional methods of receiving requests such as by physical mail and electronic mail, CDEV uses ATIP Online Management Tools ("AOMT") to receive requests from the public.

CDEV utilizes Access Pro Case Management and Redaction software as needed to process requests and apply relevant redactions.

CDEV's website contains a section dedicated to ATIP, where individuals can learn about CDEV's activities and make a request for information. CDEV's website has been upgraded to meet accessibility requirements.

## Summary of Key Issues and Actions Taken on Complaints

No complaints were filed with the Information Commissioner of Canada against the Corporation in 2025-2026 and there are no active complaints outstanding from previous reporting periods.

## Monitoring Compliance

No monitoring was necessary this period, however, AOMT is accessed every Monday and Friday by the ATIP department to make sure that all new requests have been noted and accounted for.

Summaries of the completed requests under the Act, which are published on the Open Government portal monthly, are verified for accuracy before, and once they have been published. In case of any discrepancies, relevant corrections are made. Individuals can also submit informal requests for re-release of previous requests made under the Act using the Open Government portal. CDEV adds these to a tracking schedule upon receipt.

Proactive disclosure of travel and hospitality expenses of CDEV, and subsidiaries, are senior management reviewed and once verified for accuracy are posted on a monthly basis on the CDEV corporate website.

## Appendix A – *Access to Information Act* Delegation Order

**DESIGNATION/ DÉLÉGATION**

*ACCESS TO INFORMATION ACT/*
*LOI SUR L'ACCÈS À L'INFORMATION*

**Access to Information Act Designation Order**

By this order made pursuant to section 95 of the *Access to Information Act,* I hereby authorize those officers and employees of the Canada Development Investment Corporation and subsidiaries (excluding Trans Mountain Corporation) occupying, on an acting basis or otherwise, the positions identified within the attached schedule to perform on my behalf any of the powers, duties, or functions specified therein.

This designation replaces and repeals all previous orders.

Dated in Toronto on this 18 day of June 2024

**Arrêté sur la délégation en vertu de la Loi sur l'accès à l'information**

Par le présent arrêté pris en vertu de l'article 95 de la *Loi sur l'accès à l'information,* j'autorise les agents et les employés du Corporation de développement des investissements du Canada et les filiales (sauf la Corporation Trans Mountain) occupant, par intérim ou autrement, les postes identifiés dans l'annexe ci-jointe à exercer en mon nom, les attributions, les fonctions et les pouvoirs qui y sont spécifiés.

Le présent document remplace et annule tous les arrêtés antérieurs.

Fait à Toronto en ce 18 jour en juin 2024



Elizabeth A. Wademan

President and CEO - Canada Development Investments Corporation
Présidente et cheffe de la direction- Corporation de développement des investissements du Canada

**Schedule 1**
Designation Order – *Access to Information Act*

| Powers, duties, or functions | Section | General Counsel and Corporate Secretary | ATIP Coordinator |
|---|---|---|---|
| Reasonable effort to assist applicants, respond accurately and completely and provide timely access in the format requested | 4(2.1) | yes | yes |
| To give notice to applicant that access will be given | 7(*a*) | yes | yes |
| To give access to the record | 7(*b*) | yes | yes |
| To transfer to another institution or to accept transfer from another institution and to give notice to applicant | 8(1) | yes | yes |
| To extend time limit and give notice | 9 | yes | yes |
| No records exist | 10 | yes | yes |
| To waive the requirement to pay a fee | 11(2) | yes | yes |
| To determine whether a record should be translated | 12(2) | yes | yes |
| To determine whether a record should be provided in an alternative format | 12(3) | yes | yes |
| To refuse to disclose a record referred to in that section | 13 | yes | yes |
| To refuse to disclose a record referred to in that section | 14 | yes | yes |
| To refuse to disclose a record referred to in that section | 15 | yes | yes |
| To refuse to disclose a record referred to in that section | 16 | yes | yes |
| To refuse to disclose a record referred to in that section | 16.5 | yes | yes |
| To refuse to disclose a record referred to in that section | 17 | yes | yes |
| To refuse to disclose a record referred to in that section | 18 | yes | yes |
| To refuse to disclose a record referred to in that section | 18.1 | yes | yes |
| To refuse to disclose a record referred to in that section | 19 | yes | yes |

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| To refuse to disclose a record referred to in that section | 20(1) | yes | yes |
| To refuse to disclose a record referred to in that section | 20(2) | yes | yes |
| To disclose part of a record referred to in that subsection and provide written explanation | 20(3) | yes | yes |
| To disclose, with the consent of third party, a record referred to in subsection 20(1) | 20(5) | yes | yes |
| To disclose, in the public interest, a record referred to in paragraphs 20(1)(*b*),(*c*) or (*d*) | 20(6) | yes | yes |
| To refuse to disclose a record referred to in that subsection | 21(1) | yes | yes |
| To refuse to disclose a record referred to in that section | 22 | yes | yes |
| To refuse to disclose a record referred to in that section | 22.1 | yes | yes |
| To refuse to disclose a record referred to in that section | 23 | yes | yes |
| To refuse to disclose a record referred to in that section | 24 | yes | yes |
| To disclose information that can reasonably be severed | 25 | yes | yes |
| To refuse to disclose a record referred to in that section | 26 | yes | yes |
| To give to third party notice of intent to disclose | 27(1) | yes | yes |
| To extend time limit set out in 27(1) | 27(4) | yes | yes |
| To decide on disclosure after third party representation and to give notice of decision to third party | 28(1) | yes | yes |
| To waive requirement for written representations | 28(2) | yes | yes |
| To give access unless review of decision is requested | 28(4) | yes | yes |

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| To advise the Information Commissioner of any third party who received notification or, if the document had been disclosed, would have received notification | 33 | yes | yes |
| To make representations to the Information Commissioner | 35(2) | yes | yes |
| To give notice to the Information Commissioner that access to a record will be given | 37(4) | yes | yes |
| To give notice to a third party of application for Court review | 43(2) | yes | yes |
| To give notice to applicant that third party has applied for Court review | 44(2) | yes | yes |
| To request hearing in the National Capital Region | 52(2) | yes | yes |
| To request opportunity to make representations *ex parte* | 52(3) | yes | yes |
| To carry out responsibilities conferred on the Head of the institution by regulations made under section 71 which are not included above | 71 | yes | yes |
| Publish travel expenses | 82 | yes | yes |
| Publish hospitality expenses | 83 | yes | yes |
| Publish tabled reports | 84 | yes | yes |
| Exempt information from publication | 90 | yes | yes |
| To prepare annual report for submission to Parliament | 94 | yes | yes |
| Provide services to another government institution | 96 | yes | yes |