

# Lending Policies and Procedures

The CFDC of CIFN Board of Directors and its lending officers would like to ensure our clients and potential clients are aware of our policies and procedures around:

"Loans Appeal Process", "Conflict of Interest" and "Confidentiality" as taken from the CFDC of CIFN Operations Plan:

## 1. LOANS APPEAL PROCESS

- 2.2.1 Clients may not always agree with the decision made for financial assistance. Those clients may request a decision to be reviewed.
- 2.2.2 The client may be responsible to cover the costs of the appeal. If the decision is overturned, then the client may be reimbursed all or part of the cost of appealing.
- 2.2.3 The appeal will be initiated by the client to CFDC of CIFN.
- 2.2.4 The review of the file will be conducted in confidence by a committee of the Board of Directors.
- 2.2.5 The client should not be present for the review decision, but will be informed of the results of the review when a decision is reached.

## 2. CONFLICT OF INTEREST

- 2.6.1 Any person, including a committee member, who stands to personally gain through a CFDC of CIFN loan to themselves or that of a business associate, family member, or related or affiliated organization or group or company or entity will disclose the details of the conflict of interest, will not participate in any part of the approval, negotiations or processing of the loan, and will absent him/herself from any committee or Board meetings when directed by fellow committee members.
- 2.6.2 If the person is in doubt about whether a conflict of interest exists or when an apparent conflict of interest could be inferred by anyone, that person will declare the interest and reveal the details of the possible conflict to the committee.

- 2.6.3 Any disclosure and the details will be recorded in the minutes of the meeting, if applicable.
- 2.6.4 The fact that a Board member or appointed Committee member is a member of a Band or a Native organization which has made application for financial assistance shall not constitute a conflict of interest for the purpose of this section.
- 2.6.5 The beneficial interest accruing to an employee, board members, or director in respect to a Band-owned project or an Indian organization simply because they are a member of the Band is excluded from the meaning of “conflict of interest” in these regulations.

### **3. CONFIDENTIALITY**

- 2.7.1 All employees and directors will be required to sign an Oath of Confidentiality with regard to any information they become aware of in that role.