

Policy

The Chief & Council, the Executive Director, all management and program staff of Wahnapiitae First Nation will establish a process around identifying, managing and monitoring risks. Wahnapiitae First Nation will be mindful of potential risks to the First Nation and endeavour to identify such risks and be proactive in order to mitigate any loss or damage to the First Nation.

Such potential risks may be, but are not limited to, the following:

- Financial.
- Personnel.
- Economic.
- Environmental.
- Political.

Procedure

Annual Risk Management Planning

A risk management plan will be developed and updated annually by the Executive Director and presented to the Finance and Audit Committee for review and recommendation to Council for approval.

The risk management plan must separately address risks related to specific business activities, lending, guarantees, indemnities, investments, general operations and financial reporting so that these may be managed and monitored. The Executive Director will analyze the potential impact and likelihood of each risk identified and develop an appropriate risk mitigation plan.

The Chief & Council will review, at least annually (at the times of the approval of the annual operating budget and when reviewing the financial statements of the First Nation with the First Nation's duly appointed Auditors), written reports regarding the management of potential risks. On an ongoing basis:

- First Nation staff, who are assigned to assess the project risk, will identify potential benefits.
- The designated employee(s), who are assigned to task, will not only identify quantitative factors, but will also identify qualitative factors when evaluating potential benefits and risks.
- When the First Nation staff or Council member identifies potential risks, they will advise the Executive Director who will update the risk management plan and present to the Finance and Audit Committee for review and recommendation to Council to approve.

- Once Chief & Council have approved the updated plan, the Executive Director will ensure the appropriate departments are informed.

Fraud Risk Assessment

On an annual basis, a fraud risk assessment will be performed by the Executive Director. Fraud risks identified will be included in the overall risk management plan and will include analysis of the potential impact and likelihood and an appropriate risk mitigation plan.

Council must establish procedures for the identification and assessment of the following types of potential fraud in the First Nation:

- Fraudulent financial reporting – an intentional act that is designed to deceive users of financial reports and that may result in material omission from or misstatement of financial reports.
- Fraudulent non-financial reporting – an intentional act that is designed to deceive users of non-financial reports.
- Misappropriation of assets – theft of First Nation assets in circumstances where the theft may result in a material omission or misstatement in financial reports.
- Corruption and illegal acts.

Monitoring and Reporting on Financial Management System Controls

On an annual basis, the Executive Director will prepare a document that assesses the qualifications of individuals engaged in the First Nation's financial management system activities to confirm they are qualified and competent to perform the services for which they have been engaged or hired.

On a periodic basis, the Executive Director will ensure that the individuals involved in the First Nation's financial management system activities confirm in writing that they understand their responsibilities.

On an annual basis, the Executive Director will prepare and deliver a report to the Finance and Audit Committee, who will report to Council, to confirm the individuals involved in the First Nation's financial management system activities are qualified and competent to perform the services for which they have been engaged or hired and an update on the First Nation's control environment and control activities.

For Profit Business Activity Risk Management Considerations

Existing For-Profit Business Activities:

The annual risk management plan will include identification of risks related to existing for-profit business activities and detailed mitigation plan and assigned responsibility for each risk identified.

The Executive Director will be responsible for ongoing monitoring of the for-profit business activity. Deviations from the approved business plan will be presented to the Finance and Audit Committee for review and recommendation to Council.

The monitoring will be done as follows:

- For each for-profit business activity, the individual responsible for managing that activity will provide a quarterly report to the Executive Director within 40 days of Wahnapiatae First Nation's fiscal year end will include:
 - A statement of revenue and expenses containing comparison to the approved annual budget.
 - A statement of financial position.
 - Non-financial report to accompany the quarterly financial statements.
- Within 40 days of quarter end, the Executive Director will review the approved Risk Management Plan for and record an update on each risk mitigation plan related to all for-profit business activity risks identified from the person assigned responsibility for each risk.
- Within 42 days of quarter end, the Executive Director will provide a summary of the financial and non-financial reports and update of the risk mitigation plans related to for-profit business activities to the Finance and Audit Committee.
- Within 45 days of quarter end, the Finance and Audit Committee will provide an update to Council on all for-profit business activities, including the quarterly financial statements and an update on all for-profit business activity risk mitigation plans.
- The Executive Director will be responsible for ongoing monitoring of the external for-profit business activities. Deviations from the approved investment plan will be presented to the Finance and Audit Committee for review and recommendation to Council.

New For-Profit Business Activities:

Prior to beginning any for-profit business activity, the Executive Director will lead the preparation of a business case supporting the activity. The business case should contain, at a minimum, a detailed description of the proposed activity, costs, projected revenues and benefits, funding arrangements, strategic impact, and a risk assessment (including whether the activity will result in a material liability of the First Nation or expose the First Nation's financial assets, property or resources to significant risk).

The risk assessment should address all risks related to the project and the resulting overall impacts on the First Nation.

For each risk, a detailed mitigation plan with assigned responsibility will be developed. The complete business case and risk assessment will be presented to the Finance and Audit Committee for review and recommendation to Council for approval of the activity via a Council Resolution.

Prior to beginning an external for-profit business activity, refer to the investment section of this policy.

Management of For-Profit Business Activities:

1. Under the conditions set out in section 2, 3, and 4, the First Nation may:
 - a. Carry on business as a proprietor.
 - b. Acquire an interest in a partnership as a general partner.
 - c. Act as a trustee respecting property used for, or held in the course of, carrying on a business.
2. The First Nation may carry on a business that:
 - a. Is ancillary or incidental to the provision of programs or services or other funds of First Nation governance.
3. The First Nation may carry on business activities for the primary purpose of profit if the Council determines that the business activities:
 - a. Do not result in a material liability for the First Nation.
 - b. Do not otherwise expose the First Nation's financial assets, property or resources to significant risk.
4. Council may impose terms and conditions on the conduct of any for-profit business activity in order to manage any risks associated with that activity.

Lending, Guarantees and Indemnities

For any lending, guarantees or indemnities, the Finance Director must annually document their evaluation of the risks to the First Nation of extending credit.

The following are risks to be considered:

- Ability of the individual or group to repay.
- Potential for negative impact on the First Nation's reputation.
- Extent of other similar agreements the First Nation has entered into.
- Ability of the First Nation to honour the guarantee or indemnity should it be required to do so.
- In the case of a program for lending to members of the First Nation (if applicable), the risks associated with the program and the costs of administering the program.

Approval and management of lending, guarantees and indemnities is detailed in the relevant section of this policy.

Investment Risk Assessment

Monitoring, reporting and approval of the investments strategy and performance is detailed in the relevant section of this policy.

Financial Reporting Risks

The Finance Director will identify and document any activities that could result in the risk of the following occurring:

- A material misstatement in information in the quarterly and annual financial statements.
- Failure to achieve planned levels of financial performance.
- Failure to perform the First Nation's obligations.

Insurance and Emergency Operations Continuity Plans

Refer to the relevant section of this policy for guidance on the risk assessment and management of investments, insurance and emergency planning.

Insurance Coverage

Policy

Wahnapitae First Nation will maintain adequate insurance coverage to safeguard the First Nation assets.

Procedure

Identify Significant Material Risks

The Executive Director, with input from members of the management team, will develop a list of potential significant material risks to the First Nation's financial assets and operations. This will include an examination of:

- Potential sources of liability of the First Nation arising from its operations
- Value and use of assets under control of the First Nation.
- Potential sources of liability for individuals such as Councillors, Officers and employees.
- Other risk areas that could result in a loss to the First Nation and could be insured.

Identify and Purchase Insurance Products

Based on the risk analysis performed, the Executive Director will identify the risks where insurance coverage is appropriate.

Where appropriate, legal advice will be sought as required to make sure that the terms and conditions of coverage sought are appropriate for the First Nation.

The Executive Director (or designate) will ensure that the First Nation has adequate insurance coverage for its operations, staff, volunteers, and Councillors, including:

- Comprehensive General Liability.
- Cyber Liability.
- Accidental Death or Dismemberment Liability.
- Tenant's Legal Liability.
- Office Contents (including theft, robbery, fire, etc.).
- Extra Expense.
- Accounts Receivable.
- Valuable Papers.
- Transit.
- Depositor's Forgery.
- Outdoor Signs.

- Loss Inside/Outside Premises – Broad Form (Money & Securities) (including bonding).
- Money Orders & Counterfeit Paper.
- Professional Liability.
- Directors' & Officers' Liability.
- Errors & Omissions – Employee Benefit Program.
- Commercial Building (including fire).
- Gross Earnings.
- Computer System.
- Blanket Position Bond.

The Executive Director or designate will go to market every three (3) years for competitive prices.

Approval for Insurance Coverage

The Executive Director will review and approve insurance coverage in accordance with the Income and Expenditures policy.

Maintenance of Insurance Coverage

The Finance Director will maintain a schedule of insurance policy expiration dates and payment dates and monitor on a regular basis to make sure that coverage does not lapse.

The Executive Director will review insurance coverage on an annual basis to make sure that it continues to adequately address the risks and meet the needs of the First Nation.

Policy

The First Nation may hold investments at any institution with Canadian Deposit Insurance Corporation coverage (C.D.I.C.) to a maximum of the amount of C.D.I.C. coverage, or hold investments with an institution with Assuris coverage to the maximum of the Assuris coverage.

Procedure

The First Nation may also hold investments at any of the five major Canadian banking institutions (TD, Royal, Bank of Montreal, BNS and CIBC) to a maximum limit of two million dollars, as long as the investment is regulated by the bank.

1. Authorization regarding any investment purchase will require a band council motion.
2. Authorization regarding any investment greater than \$400,000 will require approval from general membership.
3. The Finance Director, along with the Finance & Audit Committee, will work with a certified investment consultant to ensure the investment objectives (listed below) are met.
4. Please refer to "Risk Management" section for additional guidance.

Determine Investment Management Strategy

Council will establish and implement a documented investment management strategy for First Nation funds that meet the requirements of the Financial Administration Law. The investment management strategy will:

- Include both short and long-term strategies.
- Will determine the allowable uses of available funds in accordance with the First Nation's Financial Administration Law.
- Identify criteria that must be met before an investing decision is made by Council.
- Require an annual review of investments to confirm they meet the requirements of the First Nation's Financial Administration Law and are consistent with the approved investment management strategy.
- Be reviewed on an annual basis.

Risk Assessments

New Investments:

Prior to making any investment decisions, the Finance Director will lead the preparation of a preliminary risk assessment (including whether the activity will result in a material liability of the First Nation or expose the First Nation's financial assets, property or resources to significant risk).

The preliminary risk assessment should address all risks related to the investment and the resulting overall impacts on the First Nation.

For each risk, a detailed mitigation plan with assigned responsibility will be developed. The complete preliminary risk assessment will be presented first to the Executive Director for review and recommendation and then to the Finance and Audit Committee for review and recommendation to Council for approval of the investment via a Council Resolution. Council will ensure that any approved investments comply with the First Nation's Financial Administration Law and any applicable First Nation policies.

Existing Investments:

The annual risk management plan will include identification of risks related to existing investments and detailed mitigation plan and assigned responsibility for each risk identified.

The Executive Director will be responsible for ongoing monitoring of risk assessments and risk mitigation plans related to investments.

Investment Account

If the First Nation has established an investment account, the First Nation may invest funds in that account in:

- A company that is incorporated under the laws of Canada or of a province or territory and in which the First Nation is a shareholder.
- A trust in which the First Nation is a beneficiary.
- Securities issued by the First Nations Finance Authority or by a local, municipal or regional government in Canada.
- A limited partnership in which the First Nation is a partner.
- A member investment program described in the Lending, Guarantees and Indemnities Section of this policy.

Selection of Investment Manager

Council will select the investment manager. The Finance Director may review and analyze the proposals, or Council may engage an independent consultant to facilitate the selection process of investment manager:

- Investment manager proposals will be analyzed using several criteria including: experience, qualifications, investment management style, costs, past performance, volatility of returns, management fees and any other criteria identified by Council.

Investment management agreement will be consistent with this procedure and must facilitate execution of the short- and long-term investment strategies. The agreement must be executed before any funds are transferred into the investment account.

Termination of Investment Manager

Council will specify within the investment management agreement the terms and conditions for termination of the agreement, which could include:

- Failure to achieve performance goals and investment returns.
- Changes in the First Nation or its investment strategy which would no longer require the services of an investment manager.
- Changes in investment manager personnel, firm or ownership structure, investment philosophy, style or approach which might adversely affect the potential return and risk level.

Designation and Transfers of Investment Funds

The Finance Director will notify the Finance and Audit Committee in writing when there are funds available for transfer to the investment account. The written notification must identify the source of the available funds (i.e. government transfer or unrestricted) and whether they are to be invested according to the investment strategy.

Council must approve the transfer of funds to and from the investment account.

The Finance Director will communicate and oversee approved requests to redeem investments and transfer the proceeds to the First Nation.

Government Transfer Funds Permitted Investments

Government transfer funds and local revenues (if collected by the First Nation), may only be invested in:

- Securities issued or guaranteed by Canada or a province.
- Securities of a local, municipal, or regional government in Canada.
- Investments guaranteed by a bank, trust company or credit union.
- Deposits in a bank or trust company in Canada or non-equity or membership shares in a credit union.
- Securities issued by the First Nations Finance Authority or a municipal finance authority established by a province.
- As per the Government Transfer Agreement.

Investment objectives:

1. The investment must be managed in such a way as to provide sufficient income to membership, such as, but not limited to, programming dollars and reinvestment opportunities.
2. Where possible, the value of the assets should be enhanced so as to at least keep pace with inflation over the longer term.

3. We will maintain conservative growth strategy objectives:
 - a) Invest in low risk to medium risk opportunities,
 - b) Achieve a reasonable pay-back period,
 - c) Achieve a positive rate of return, and
 - d) Ensure the investment opportunity has positive net present value (after tax).
4. We will achieve maximization of total return and preservation of capital without undue exposure to risk within the parameters specified:
 - a) Protect principal amount of investment,
 - b) Protect purchasing power of the First Nation (limitation of overall risk), and
 - c) Seek to limit volatility.

Monitoring of Investments

The Finance Director will reconcile the investment accounts to the general ledger and investment statements.

The Finance Director will verify the investment management fees charged to make sure they are consistent with the underlying contracts.

The Finance Director will prepare a quarterly monitoring report and provide that report to the Executive Director. The report will summarize:

- The performance of the investments under management to relevant benchmarks.
- The weighting of the investment portfolio and comparison to the target portfolio asset allocation.
- Any relevant media or news articles about the investment manager.
- Any ownership or staffing changes within the investment manager organization.

The Executive Director will review the report, may provide further recommendations, and submit to the Finance and Audit Committee.

The Finance and Audit Committee will review the quarterly monitoring report, may provide further recommendations, provide the report to Council for approval.

The investment manager may attend a Council meeting and discuss investment performance, changes in personnel and investment strategy.

On an annual basis, the Finance Director will review all investments to confirm they meet the requirements of the First Nation's Financial Administration Law and are consistent with the approved investment management strategy of the First Nation. The results of this review will be provided to the Finance and Audit Committee.

Record Keeping

All records regarding investment decisions will be retained in accordance with the Information Management Policy.

Policy

It is Council's policy to establish effective and efficient controls for all banking activities and financial service agreements with financial institutions.

Procedure

Financial Institution Account Management

No account may be opened for the receipt and deposit of funds for Wahnapiatae First Nation unless the account is:

- In the name of the First Nation.
- Opened in a financial institution.
- *Authorized by Council.*

The First Nation must establish the following accounts in a financial institution:

- (a) General account for funds from any sources other than those described in (b) to (c).
- (b) A trust account if The First Nation has funds held in trust, if applicable.
- (c) A tangible assets reserve account for funds set aside for tangible capital asset replacement.

The First Nation may establish any other accounts not referred to above as may be necessary and appropriate to manage the First Nations financial assets.

All interest earned on a trust account, and tangible capital assets reserve account must be retained in their respective accounts.

The Finance Director maintains correspondence and official documents relating to the opening, maintenance, and closing of all financial institution accounts.

The Finance Director will develop a clear description of the purpose of each financial institution account and provide it to all employees who are responsible for depositing funds or reconciling the accounts.

The list of individuals with authorized signing authorities for each financial institution account will be maintained by the Finance Director. All changes to signing authorities must be approved by Council.

Online financial institution access will be permitted and controlled as follows:

- The employee performing account reconciliations will be granted read-only access to the account they have been assigned to reconcile.
- Only employees with delegated signing authority by Council will be provided with online banking access to perform on-line banking transactions.
- Transaction completion activities, such as electronic funds transfers, will be controlled in a similar manner as cheques. Eg: if two members of Council are authorized signatories on the financial institute account, two members of Council must sign the electronic fund transfer. Once approved by the authorized signatories on the account, two employees will also be required to approve each electronic transaction; each employee will have a separate login and individual password.

Petty Cash

A limited number of petty cash accounts if required, and as determined by the Finance Director and based on business needs, will be created to pay for small items when payment by cheque is not practical or possible; however, every effort will be made to pay by cheque or electronic transfer. Petty cash will be managed as follows:

- The creation of a petty cash account must be approved by the Finance Director.
- The total amount of the fund will not exceed \$500.00.
- The person responsible for petty cash will maintain an activity log, supporting documentation, and reconciliation.
- Petty cash reconciliations will occur at least once per quarter.
- Petty cash funds and receipts must be kept in a locked drawer or safe with controlled access.
- Accounts payable will replenish the petty cash only upon receipt of a completed petty cash reconciliation.

Cheque Stock

All blank cheque stock will be stored in a locked cabinet or safe with controlled or limited access.

Cheque stock should be sequentially pre-numbered.

No accounts payable employees, or employees authorized to print out cheques, are authorized to sign cheques or approve fund transfers.

No one person or employee will be allowed to enter invoices, select invoices for payment and then print and sign cheques. At minimum, this process requires at least two individuals to make sure there is segregation of duties.

Credit Lines

The Finance Director will authorize the draw down on any line of credit or overdraft facilities.

Opening and Closing a Financial Institution Account

Once the opening of a financial institution account has been approved by Council, the Finance Director outlines the following:

- Name of account.
- Instructions regarding purpose of account.
- Names of signatories and authority limits.
- address where all statements and correspondence is to be sent.
- Financial institution contact person.

The financial institution accounts will be created such that all non-deposit transactions (such as cheques, electronic transfers, etc.) require two signatures for approval according to the Authorization and Delegation Table and the Income and Expenditures Policy.

Once the financial institution account is opened, the Finance Director instructs the appropriate employee to set up the account in the general ledger.

The request to close a financial institution account must include:

- Name of account.
- Financial institution account number.
- Closing bank balance and statement.
- Approval by Council.

Transfers Between Accounts

Two approvals from authorized signatories are required for all transfers of funds between bank accounts via cheque or EFT.

Financial Agreements

The First Nation may enter into the following financial agreements in the name of The First Nation (lines of credit or overdraft credit):

- For the purpose of efficient management of The First Nation's financial assets, agreements with financial institutions and related services agreements.
- For the purpose of reducing risks or maximizing benefits in relation to the borrowing, lending or investing of The First Nation's financial assets, agreements

with financial institutions respecting currency exchange, spot and future currency, interest rate exchange and future interest rates.

The Finance Director may enter into any financial agreements referred to above on behalf of The First Nation.

Account Reconciliation

Each of The First Nation's financial institution accounts will be reconciled to the accounting system records on a monthly basis and independently reviewed within 30 business days of month end.

An independent review must be undertaken by an employee or external person who does not report to the employee who prepared the financial institution account reconciliation.

Reconciliation and documentation records to support the amounts recorded on the reconciliation will be retained according to the Information Management Policy.

The employee preparing the financial institution account reconciliation will monitor and investigate unreconciled and outstanding amounts carrying forward beyond 30 business days of month end and will complete the following:

- Monitor outstanding cheques and inquire to determine whether the cheques are valid, void or stale-dated.
- Monitor outstanding deposits and inquire if not cleared by the financial institution.

The employee preparing the reconciliation will sign and date it as evidence that the reconciliation is complete and submit the reconciliation to Finance Director.

The Finance Director will submit all financial institution account reconciliations for independent review.

Independent Review

Each financial institution account's monthly reconciliation must be independently reviewed for completeness, timeliness and accuracy to ensure the following:

- Reconciliation balances.
- All amounts recorded on the reconciliation are appropriately supported by documentation such as financial institution statements and financial system reports.
- Adjustments are reasonable, routine in nature (e.g. financial institution fees), supported by documentation, and are not carried over for multiple months on the reconciliation.
- Unusual adjustments are well explained, supported, and, if material in nature, are brought to the attention of the Finance and Audit Committee.

The independent review must be undertaken by someone other than the preparer who does not report to the preparer.

Irregularities

Irregularities, such as significant reconciliations that do not balance or unusual adjustments, will be reported by the Finance Director to the Finance and Audit Committee as soon as practical.

Cheque Signors

Policy

Wahnapiatae First Nation will ensure that appropriate cheque signing authority is followed to safeguard First Nation assets.

Procedure

The Chief & Council will annually review and approve First Nation Signing Officers. First Nation Signing Officers may include, but are not limited to all Chief & Council and Executive Director. Two signatures/authorizations are required on all company cheques and Electronic Fund Transfers (EFTs), and any two signing officers may review and approve payments, with the following exceptions:

- 1) Executive Director expenditures must be reviewed and signed by at least one of the following: Chief and/or any Council member. Any cheques issued to the Executive Director must be signed by Chief and/or Council; the Executive Director cannot sign cheques issued to themselves.
- 2) Department Managers may approve their own departmental expenditures on amounts less than:
 - a) \$1000 during their 6-month probationary period.
 - b) \$5000 after their probationary period and under 1-year of employment with written approval by the Executive Director.
 - c) \$10,000 after 1-year of employment with written approval by the Executive Director.
- 3) The Executive Director may approve all departmental expenditures on amounts less than \$25,000.
- 4) Extraordinary expenses must be reviewed and signed by at least one of the following: Chief and any Council member. An extraordinary expense is defined as any payment of an amount greater than \$25,000, with the exception of Receiver General payments or any payment within an approved budget.
- 5) Expenses that in an amount greater than \$25,000 must have a band council motion or a band council resolution attached as additional documentation, with the exception of Receiver General payments or any payment within an approved budget.
- 6) Membership approval is required for non-program expenditures for any amounts greater than \$400,000 other than in the case of an emergency or situation where community safety is put at risk.

Cheque signers will not sign blank cheques under any circumstances.

Corporate Credit Card

Policy

Wahnapitae First Nation will ensure that appropriate use of First Nation credit card is followed to safeguard First Nation assets.

Procedure

Any balance on the corporate credit card will be paid in full on a monthly basis, and disbursements will be subject to the ***policy*** [Cheque Signing Authority](#). Wahnapitae First Nation will ensure that any personal expenditure done on the corporate credit card will be charged back to the employee.

A corporate credit card account may be issued at the discretion of Chief & Council and the Executive Director, with an established limit to the related individuals:

1. Chief
2. Executive Director
3. Lands and Resource Director
4. Health Director
5. Infrastructure and Development Director
6. Education Director
7. Band Representative Supervisor
8. Asset & Procurement Coordinator
9. Communications & Governance Director

Contracted Services

Policy

Wahnapitae First Nation will ensure that there is written documentation for all contracted services. Contracted services may include professional consultants, service delivery and administrative functions.

Procedure

Wahnapitae First Nation will obtain written contracts for all contracted services in accordance with the Procurement Policy, which includes at a minimum the following:

1. A description of the services to be provided.
2. Terms of the contract, such as, but not limited to, deliverables and warranties.
3. Procedures for payment.
4. Penalties for default.

Policy

Wahnapitae First Nation will ensure that there is written documentation for all paid honoraria. Honorarium payments may include payments to Chief & Council, other committee participants and to an individual or group in recognition of the contribution of gratuitous services to the community.

Procedure

Any meeting that an individual attends must be a registered duly convened meeting and there must be evidence of attendance at the meetings.

Wahnapitae First Nation' policy on honorarium payments is based on the following thresholds:

For Councilors:

1. 0 to 4 hours - \$300.00
2. 4 to 6 hours - \$350.00
3. Day - \$400.00
4. Overnight - \$500.00

For Trustees:

1. 0 to 4 hours - \$200.00
2. 4 to 6 hours - \$250.00
3. Day - \$300.00
4. Overnight - \$400.00

For Committee members:

- \$100 per meeting

If the duties and responsibilities of a staff member is to participate on any committee, that staff is not eligible for an honorarium.

For more clarity, if a staff member is on a committee, that is outside of their duties and responsibilities, that staff member may claim an honorarium. Example: Housing Coordinator cannot claim an honorarium for being part of the Housing Committee as this is part of their duties and responsibilities, but if the Housing Coordinator was on the Cultural Committee, the Housing Coordinator could claim an honorarium as this is not part of their duties and responsibilities.

Individual providing an Opening / Closing (includes smudging)

- Opening \$100.00.
- Opening and Closing and other duties during the event \$200.00.

Unpaid Traditional Practitioner, knowledge sharing, pipe ceremony, sweat lodge, knowledge teachings or facilitating a cultural workshop

- \$300.00 Half day (0 to 4 hours).
- \$500.00 Full day.

Honorariums will not be provided to paid services.

Travel expenses

Policy

Wahnapitae First Nation will ensure that there is written documentation for all paid travel expenses. Travel claim payments may include payments to Chief & Council, Trustees, committee participants, members, and employees.

Procedure

Direct related costs will be paid out at the rates as prescribed under Canada Revenue Agency (CRA) guidelines and can be adjusted at the discretion of the Executive Director; any adjustments will be dependent on the source or program sponsor:

- Meals will be reimbursed at the current CRA rates (meals will only be reimbursed for out-of-town travel, unless otherwise approved).
- Actual mileage will be paid at a rate as set by the current CRA rates from the departure location; however, if the mileage is being reimbursed by a different company, then the mileage will be paid at the reimbursing company's rates.
- The value of the mileage claimed cannot exceed the cost of airfare and ground transportation associated with air travel for the same journey.

Chief and Council

Chief and Council may claim mileage from their primary residence to the location of scheduled meeting that they attend on behalf of Wahnapitae First Nation, for business purposes.

Trustees

Trustees may claim mileage from their primary residence to the location of scheduled meeting that they attend on behalf of Wahnapitae First Nation, for business purposes.

Committee Members

Committee members may claim mileage from their primary residence to the location of the scheduled committee meeting.

Employees

Prior to travel, employees will submit a request to their immediate supervisor stating the purpose, dates, and estimated costs for the proposed travel. The immediate supervisor will review it to make sure the proposed travel is in support of official First Nation business and that there is sufficient budget available.

Travelling expenses shall be approved in advance by the Department Director, and in the event of absence of the Departmental Director, then the Executive Director shall

approve the advance. Advance travel claims must be submitted no less than one week prior to departure for out-of-town travel.

Employees will clearly demonstrate and document that all amounts they are claiming for reimbursement were directly related to authorized activities performed on behalf of the First Nation

Travel advances shall be used to cover expenses incurred on Wahnapiatae First Nation business, such as out-of-town expenses, in-town expenses, travel, meals, and accommodations.

If the First Nation requires that employees go out of town for business purposes, the employee shall receive an advance payment; however, it is the employee's/Wahnapiatae First Nation delegate's responsibility to ensure prompt remittance of related receipts are given to the Finance Department within seven (7) days upon returning from the meeting.

It is expected that a band vehicle is to be used, unless one is not available. If the employee chooses to use their own vehicle, when a band vehicle is available, mileage may be paid at a reduced rate, unless otherwise approved.

If travelling the direction already and not returning to the Wahnapiatae First Nation administration building, then mileage will be paid for one direction only and not a return trip, unless otherwise approved.

If travelling directly from your residence during regular business hours, and the travelling distance is less than the travelling distance from your residence to the administration office, mileage will not be reimbursed. If travel is greater than the travelling distance from your residence to the administration office, the amount over and above will be reimbursed, unless otherwise approved.

Expenses reimbursed by hosts or other third-party funding arrangements must not be claimed. Declaration of such third-party reimbursements must be made in accordance with The First Nation's relevant policy.

Private Vehicles

Individuals using a private vehicle for work related travel must have the minimum insurance coverage legally required for work related use by their province or territory of residence. The First Nation will not be held responsible for any claims, accidents or damage to a private vehicle.

Travel Policy

All travel-related expenditures, including transportation, lodging, meals, and incidentals, must comply with the organization's **Travel Policy**. This policy outlines detailed requirements for travel approvals, booking procedures, allowable and non-reimbursable

expenses, documentation standards, and reimbursement rates (including per diem and mileage). Employees must refer to the Travel Policy to ensure full compliance before incurring or submitting travel expenses.

POLICY

It is Council's policy to establish a process around emergency and operations continuity planning that addresses the key risks facing the First Nation.

PROCEDURES

Analyze the Current Situation

The Executive Director will conduct a risk assessment to identify all risks that could have an impact on the operations and finances of the First Nation, including potential threats such as fires, natural disasters, and environmental risks.

For each of the risks identified, the Executive Director will determine the likelihood of the threat occurring and the potential impact on the First Nation's operations.

Develop the Emergency Response & Action Plans

Based on the likelihood and impact, the Executive Director, with input from outside expertise as required, will determine which risks will be addressed in the emergency response and action plans. The plans should identify critical systems or operations and how these will be managed in the event of an emergency to minimize effects on the First Nation's overall operations and finances.

Areas, which should be examined, and examples of issues to address for each risk include the following:

Buildings and sites

How will operations continue if the site is inaccessible or destroyed?

What safety precautions need to be taken in the event of damage to the building?

Critical equipment

Are there backups in place for critical equipment (i.e. an extra item in storage)?

How quickly can repairs be made and by whom?

Are there outside vendors that can be used to replace an unavailable piece of equipment?

Information Technology

Can the computer network be accessed from offsite (e.g. virtual private network)?

Are there adequate numbers of laptops, cell/satellite phones, etc. to maintain communication remotely during an emergency?

Are critical systems and databases regularly backed up? Is the backup stored offsite?

People

How will the First Nation communicate with staff/members during the emergency?

Do the critical finance and operations staff members have designated and trained back-ups?

Is there an offsite location where limited but critical operations can continue during an emergency?

Are there any potential health and safety issues associated with a particular risk? How would these be dealt with?

Responsibilities for each component of the emergency and operations continuity plan will be clearly identified and communicated with the assigned individuals. Alternates for key individuals will be identified and provided with information on their duties.

The Executive Director will develop an emergency notification procedure to explain how to enact the plan should an emergency occur.

Implement the Plan

The Executive Director will make sure all affected staff and First Nation members have access to the emergency response and action plans.

All staff who have been assigned responsibilities within the emergency response and action plans will be provided training to carry out their role in the event of an emergency.

The Emergency Response plan and Emergency Action Plan will be tested by the Executive Director.

Testing could include mock disaster exercises, communication and off-site computing tests, fire drills, etc.

The emergency response and actions plans documentation will be maintained at all First Nation's site locations and key employees will keep a copy at home. It should include all required information to enact the plan (i.e. emergency contact, responsibilities list, vendor lists, fire drill routes, etc.).

Annual Review

On an annual basis, the Executive Director and key employees will review the plan and associated documentation to make sure it remains relevant and up to date. Updates will be performed, and new versions of the plan and associated documentation distributed to the sites and individuals noted above.

Changes to the plan will be approved by Council.

POLICY

It is Council's policy to establish a process around continuous improvement in the First Nation's financial management system.

PROCEDURE

Financial Management System Review

Annually on a date scheduled by the Finance and Audit Committee, the Executive Director will review the financial management system for the period of the previous four quarters and up to the date of the meeting.

The agenda items will include, but are not limited to, the following:

- Review of the system's processes and procedures.
- Review of applicable laws for compliance.
- Review of external and internal assessment results.
- Review of identified process improvement opportunities including their resolution.
- Review of all committees' terms of reference.
- Review of the First Nation's corporate and personnel organization charts.

The Executive Director will prepare a report for distribution to the Finance and Audit Committee that includes the following:

- Statement of whether the financial management system has, during the review period, been operated in compliance with all applicable laws, policies, procedures and directions.
- Recommendations for any changes to those laws, policies, procedures and directions that would be beneficial to the financial management system.

The Executive Director will make the report available to Council and auditors.

Internal Assessments

The employee performing the internal assessment will be independent of the operations or activities being assessed. This employee will be assigned by the Executive Director and must be independent of the operation or activity under review.

Operations or activities under review by the employee assigned by the Executive Director includes the following:

- Reviewing all policies under the Financial Administration Law.

- Reviewing all procedures, within the policies, under the Financial Administration Law.
- Reviewing the Terms of Reference for the Finance and Audit Committee.
- Any other documentation with regards to the Financial Management System of the First Nation.

A documented report will be prepared by the reviewer for each internal assessment performed. The report will contain the reviewer's findings and resolutions of any concerns identified in the findings.

Reports will be issued to the Executive Director.

Continual Improvement Process

The Finance Director will be responsible for ensuring that any concerns or issues regarding the financial management system brought to their attention are tracked, managed, and resolved on an ongoing basis.

Review of Financial Administration Law

Annually, the Finance and Audit Committee will review the Financial Administration Law to:

- Determine if it facilitates effective and sound financial administration of the First Nation.
- Identify any amendments to this Law that may better serve this objective.

The Finance and Audit Committee will report to the Council and auditors on the results of its review including any recommendations it makes for amendments to the Financial Administration Law.

Membership Information or Involvement

In the event that recommendations from the Finance and Audit Committee require amendments to the Financial Administration Law, Council will make sure that First Nation members are provided the information in consideration of any proposed amendments to the Law as required in the Financial Administration Law. Membership will be informed and involved for any Financial Administration Law Updates.

Appendix A

Tangible Asset Table

Primary Category	Sub-Category	Examples	Threshold	Pooled	Useful Life (Years)
Land	Land	Land purchased- on and off reserve Land donated – on and off reserve	All		Infinite
	Land Improvements	Fencing and gates, parking lots, paths and trails, landscaping, sports fields, site preparation and playgrounds	\$10,000		10 – 50
Buildings	Buildings	Community buildings, Band Office, Health Centre, CMHC housing, Rental Housing, Band Owned Housing, storage buildings, residential and office trailers, sheds, fencing, etc	\$10,000		20 – 50
Machinery and Equipment	Light	Ride on mowers, boats, ATV's snowmobiles and generators	\$5,000		6 – 10
	Heavy	Loaders/backhoes, tractors, graders, Pumper truck, etc	\$10,000		8 – 15
Furniture and Equipment	Furniture	Desks, chairs, furniture and appliances	\$2,000		5 – 20
	Equipment	Photocopiers, telephone systems, etc	\$2,000		3 – 10
Computer Equipment	Hardware	Desktops, laptops, servers, scanners, printers, hard drives, modems, tape drives and plotters.	\$2,000	X	3 – 7
	Software	Off the shelf software and related upgrades, software licences after removing any	\$2,000	X	1 – 10

		maintenance or similar charges			
Vehicles	Light	Cars, ½ tonne trucks, school bus and vans	\$5,000		3 – 10
	Heavy	1 tonne trucks, garbage packer, dump truck, plow truck	\$5,000		8 – 15
	Trailers	Utility Trailers	\$2,500	X	1 – 10
Roads	Surface	Asphalt and gravel	\$5,000		10 – 25
	Subsurface	Subsurface of road	\$10,000		25 – 50
Bridges	Superstructure	Bridge	\$5,000		30 – 80
	Decks	Bridge	\$5,000		15 – 30
Culverts	Culverts	Concrete culverts	\$5,000		50 – 80
Signage	Signs	Road signs	\$2,500	X	8 – 20
Water and Wastewater Systems	Structures	Plant, intakes, filtration, reservoir, buildings, dam, Bio Solids, Outfall, Septic systems, etc	\$10,000		40 – 50
	Infrastructure	Water/Wastewater mains, hydrants, valves, meters, service lats, pump stations, manholes, sewer lats, lagoons, etc	\$10,000		20 – 50
	Equipment	Electrical, mechanical, instruments, etc	\$10,000		10 – 20
Street lights	Street lights	Outdoor street lights	\$2,500		15 – 30
Landfill site	Landfill site	Designated landfill area	\$10,000		25 – 40