

Access to
information policy



Access to Information Policy Implementation Guidelines

2019

Table of Contents

I. Glossary

II. Implementation

A. Classification

1. Scope
2. Information Management System
3. Classification Procedure

B. Disclosure

1. General aspects
2. Information routinely made available
3. Timeframes
4. Languages
5. Redaction
6. Environmental and Social Information

C. Procedures

- A. Requesting Information
 1. Procedure for Requesting Information
 2. Responding to requests
 3. Client and Third-Party Information
 4. Historical Information
 5. Emergency needs for Information
 6. System for Tracking External Requests for Information
 7. Monitoring Disclosure Compliance
- B. Review Process
 1. Administration Committee
 2. External Panel
 3. Board of Executive Directors
- C. Positive Override
 1. Positive Override
 2. Request for Positive Override to the Administration Committee
 3. Request for Positive Override of Board Records
- D. Policy Review
 1. Implementation Progress
 2. Review procedure

I. Glossary:

1. **Access to Information Group:** Group of IDB Invest Employees led by IDB Invest Communications Team in charge of implementing the Policy.
2. **Administration Committee:** The IDB Invest management-level committee in charge of reviewing first-stage Denials following a Request for Review, deciding on Positive Overrides related to Information other than Board Records, and overseeing the implementation of the Policy.
3. **Advisory Services:** Non-financial products and services that IDB Invest offers, including knowledge and technical assistance.
4. **Advisory Services Project (ASP):** An IDB Invest operation that assigns resources from donor trust funds, IDB Invest or IDB's own resources, to finance the purchase of goods or services for the provision of Advisory Services.
5. **Archivist:** Person delegated to upload documents in the Records Management System at Author's request.
6. **Author:** IDB Invest Employee responsible for producing or receiving Information and saving it in the Records Management System. The Author can delegate uploading functions to an Archivist, in which case the Author must provide instructions on classification to the Archivist.
7. **Board:** The Board of Executive Directors of IDB Invest.
8. **Board Documents:** Documents prepared for consideration or Information of the IDB Invest Board of Executive Directors or its committees.
9. **Board Records:** Documents pertaining to the proceedings and work of the Board and the Board of Governors registered by SEC.
10. **Classification or Classify:** The process of assigning a classification category to Information that determines the extent to which and who may access the Information.
11. **Classification Instructions:** Instructions developed by IDB Invest divisions and approved by the Administration Committee to instruct Employees on how to Classify Information created or received in their respective division according to the Policy.
12. **Communications Team:** A group within the Finance and Administration Department (FNA) in charge of institutional communications and leading the Access to Information Group.
13. **Confidential:** An access to Information Classification category indicating that the Information falls under one or more of the Policy's Exceptions.
14. **Division Chiefs and Team Heads:** IDB Invest staff in charge of a division or a team within a department.

15. **Document Date:** The date on which a document was approved or cleared by the Board, committee, or senior Management. For documents not subject to clearance or approval, or documents received by IDB Invest, the Document Date is the date on which such document was saved in the Records Management System.
16. **Disclosure:** Making Information available to the public, whether through IDB Invest's external website, its on-line request system, or other appropriate means of providing access.
17. **Effective Date:** January 1, 2020.
18. **Employees:** Personnel of IDB Invest or the IDB, as the case may be, including staff, consultants, contractors and Product and External Services Contractual (PEC).
19. **Environmental and Social Officer:** Personnel working in the Social, Environmental and Corporate Governance division.
20. **Exceptions:** Categories of Information indicated in Section IV of the Policy.
21. **External Panel:** The external review panel independent from Management created under the Policy to conduct second-stage reviews of IDB Invest Administration Committee's decisions to deny access to Information based on Policy Exceptions.
22. **Guidelines:** These Policy Implementation Guidelines.
23. **Historical Information:** All IDB Invest Information created and received during the course of official business before January 1, 2020.
24. **IDB:** The Inter-American Development Bank.
25. **IDB Group:** The IDB, IDB Invest and the Multilateral Investment Fund (now called IDB Lab).
26. **IDB Invest:** The Inter-American Investment Corporation, a member of the IDB Group, which has been established as an international organization that promotes the economic development of its regional developing member countries by encouraging the establishment, expansion, and modernization of private enterprises.
27. **Independent Offices:** The Office of Evaluation and Oversight (OVE), the Office of Institutional Integrity (OII), the Sanctions Committee (SRE), the Independent Consultation and Investigation Mechanism (ICIM), the Office of Ethics (ETH), the Office of the Executive Auditor (AUG), and the Office of the Ombudsperson (OMB).
28. **Information:** Information IDB Invest produces or receives during the course of official business after the Effective Date, including information produced or received by the Independent Offices.

29. **Information Denials:** The decision of Management, the Administration Committee or the External Panel to deny access to the requested Information based on Policy Exceptions.
30. **IT:** Information Technology Division in charge of supporting the systems needed to implement the Policy.
31. **INO:** Investment Operations Department.
32. **Investment:** The terms “investments” and “financings” as well as the verbs “invest” and “finance” are used interchangeably herein to refer to IDB Invest’s financing of an operation.
33. **Investment Summary:** The summary of an IDB Invest potential Investment that includes the elements listed in paragraph 30 of the Policy.
34. **Joint Document:** Has the meaning set forth in Paragraph 67 of these Guidelines.
35. **Management:** The secondary organizational structure of IDB Invest as determined by IDB Invest’s General Manager.
36. **Policy:** The Access to Information Policy approved by the Board on April 23, 2019 and effective on January 1, 2020.
37. **Positive Override:** IDB Invest’s prerogative to disclose Information that it would ordinarily not release to the public, in the exceptional circumstances established in Paragraphs 62 and 63 of the Policy.
38. **Project Team Leaders:** IDB Invest staff in charge of leading a specific Investment.
39. **Public:** An Access to Information Classification category indicating that the Information does not fall under the Policy’s Exceptions.
40. **Publishers:** Employees identified by Management as authorized to post Information classified as “Public” on the IDB Invest external website.
41. **Records Management:** IDB Invest team in charge of keeping and managing Information.
42. **Records Management System:** Systems designed to support the creation, storage, classification, sharing, Disclosure, preservation and disposal of Information.
43. **Redaction:** The process of blacking out or covering Confidential text with a thick black line to make the Confidential text illegible, for purposes of creating a public version of a document that contains both Public and Confidential Information.
44. **Request for Historical Information:** A communication submitted to IDB Invest through the channels specified in the Policy and these Guidelines requesting Information produced or received by IDB Invest before the Effective Date.

45. **Request for Information:** A communication submitted to IDB Invest through the channels specified in the Policy and these Guidelines requesting Information produced or received by IDB Invest in the course of its official business after the Effective Date.
46. **Request for Review:** A communication submitted to IDB Invest through the channels specified in the Policy and these Guidelines requesting the Administration Committee, the External Panel or the Board of Executive Directors to review a decision denying access to Information.
47. **Requester:** Member of the public who submits a Request for Information or a Request for Review to IDB Invest.
48. **SEC:** IDB Invest Office of the Secretary.
49. **Simultaneous Disclosure:** The process of publishing Information on the IDB Invest external website simultaneously to distributing it to the Board pursuant the Policy.
50. **Transparency Hub:** System and process established to receive, process and communicate results of Requests to Requesters, which is managed by the Access to Information Group.

II. Implementation

A. Classification

1. Scope

51. On or after the Effective Date, the Author of Information will Classify Information in accordance with the Policy and these Guidelines. The Policy covers:

(a) **Information IDB Invest Creates:** Any Information or data created by IDB Invest, including Joint Documents prepared by IDB and IDB Invest.

(b) **Information IDB Invest Receives:** Any Information that IDB Invest receives and a client, partner, co-financiers or third parties provides.

52. If any Author or Employee has any questions or doubts regarding the application of the Policy or these Guidelines, they should consult with the Access to Information Group for necessary guidance and/or clarifications.

2. Information Management System

53. Authors and delegated Archivists will save Information in the Records Management System in accordance with the Records Management Directive and related guidelines. This system is designed to support the creation, storage, sharing, preservation and disposal of Information, including Classification and Disclosure.

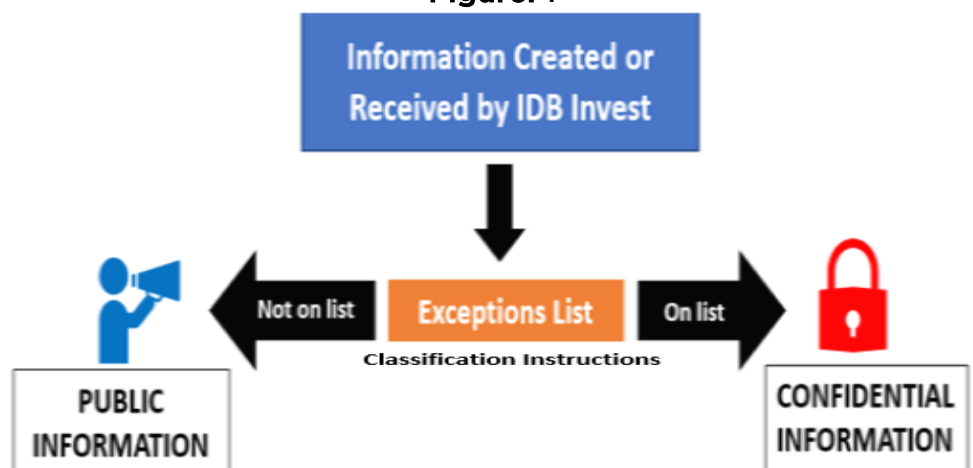
54. This process facilitates locating Information so that: i) Information classified as Public that is routinely disclosed pursuant to the Policy is visibly displayed on the IDB Invest's external website, (ii) other Information classified as Public is readily available upon request; and (iii) Information identified as Confidential is properly handled and protected.

3. Classification Procedure

a. General aspects

55. According to article 64 of the Policy, IDB Invest will Classify Information as Public or Confidential. To determine whether the Information is Public or Confidential, each Author must determine whether such Information falls under one or more of the Policy's Exceptions in accordance with the Policy and these Guidelines. The Administration Committee will approve and update each Department's Classification Instructions proposed by each department to assist Authors in the Classification process.

Figure: 1



b. Exceptions

56. The following categories of Information will remain Confidential because IDB Invest has determined that their Disclosure will imply more harm than benefit to legitimate rights or interests of affected parties in accordance with the Policy. As provided under the Access to Information Policy and set out below, IDB Invest does not disclose to the public Information that is subject to professional secrecy between client and attorney, and other applicable legal privileges. Such legal privileges would include archival immunity, as provided under Article VII, Section 5 of the Agreement Establishing the Inter-American Investment Corporation.

Exceptions	Rationale	For illustrative purposes and in a non-exhaustive manner, IDB Invest does not provide access to the following Information
Commercially Sensitive Information	<p>Consistent with the practice of commercial banks and of most public sector financial institutions with respect to their investments in the private sector, IDB Invest does not disclose to the public commercial, proprietary, financial, privileged, intellectual property, or other non-public Information about its clients, co-financiers, investors, or third parties. To do so would be contrary to the legitimate expectations of such parties, who need to be able to communicate detailed Information to IDB Invest without fear of compromising Confidential Information.</p>	<p>i) legal documentation or correspondence pertaining to IDB Invest's investments or Advisory Services, documents or Information relating to negotiations between IDB Invest and its clients or other third parties relating to such investments or Advisory Services;</p> <p>ii) Board documents relating to specific investments, advisory service projects, and Investment facilities; and</p> <p>iii) Information belonging to IDB Invest's clients, co-financiers, investors or third parties identified by them as Confidential, such as business plans, financial projections, commercial or trade secrets.</p>
Financial Information	<p>IDB Invest does not disclose to the public financial Information that would be detrimental to the financial or commercial interests of IDB Invest if disclosed, including Information that may be sensitive in capital and financial markets or that may affect its competitiveness.</p>	<p>i) liquidity investments, estimates of future borrowings, and redemptions of borrowings;</p> <p>ii) expected interest rates, rates of return, and financial ratios, financial forecasts, and financial models;</p> <p>iii) data and procedures for specific Investment decisions for IDB Invest's operations, credit and solvency evaluations, and credit ratings on borrowers and other clients;</p> <p>iv) financial Information that has not yet been approved by the respective authorities according to IDB Invest governance; and</p> <p>v) Information on private bond offerings, credit assessments, certain details of Investment transactions including guarantees, and Information on amounts overdue from borrowers, including actions taken prior to placement of such credits in nonaccrual status.</p>
Deliberative Information	<p>IDB Invest does not disclose to the public Information that would affect the integrity of the decision-making process or that inhibit the free and candid exchange of ideas in the deliberative processes. By protecting this Information based on its function and content, IDB Invest seeks to safeguard a space for reflection and discussion free of public scrutiny. When the deliberative process has concluded, and a decision has been made, IDB Invest makes public the final decision, results, and agreements that emerge from these processes.</p>	<p>i) transcripts of Board and Board Committee meetings;</p> <p>ii) statements of individual Executive Directors and staff in the context of Board and Board Committee meetings, unless voluntarily disclosed;</p> <p>iii) communications and memoranda produced by the offices of the Executive Directors relating to Board and Board Committee proceedings;</p> <p>iv) memoranda, opinions, or informal notes of any kind distributed to the full Board or to a Committee;</p> <p>v) studies, reports, audits, assessments, or analyses prepared to support internal decision-making or</p>

		the establishment of Management directives and procedures; vi) Information prepared or exchanged in the course of its deliberations with clients, member countries, and other entities with which IDB Invest cooperates, including Information prepared by the staff, consultants, attorneys, or agents of IDB Invest; vii) reports prepared by AUG; and viii) circulars and technical briefing materials prepared by Management for Information of the Board and Management presentations to the Board.
Legal, Disciplinary, or Investigative Matters	IDB Invest does not disclose to the Public Information that is subject to professional secrecy between client and attorney, and other applicable legal privileges.	i) Information regarding deliberations and materials considered in the proceedings of the Conduct Committee of the Board, the Anti-Corruption Policy Committee, and the Sanctions Committee; ii) Information gathered, received, or generated in the course of an investigation by the Office of Institutional Integrity (OII) or a third party on behalf of such office, in accordance with IDB Invest Integrity Framework, Sanctioning Procedures, and other regulations. In addition, Information related to allegations of prohibited practices received by OII, consultations regarding integrity matters, and Information regarding integrity of due diligence in investments and operations will not be disclosed; iii) Information related to professional secrecy, including legal advice and communications sent or received by IDB Invest's general counsel, attorneys within IDB Invest's Legal Department, and other legal advisors; and iv) Information on matters in legal dispute or under negotiation, or Information which, if disclosed, would violate applicable law or might prejudice an investigation or any legal or regulatory proceedings, or subject IDB Invest to an undue risk of litigation.
Communication of Executive Directors' Offices	IDB Invest does not disclose to the Public Information related to the Communications of Executive Directors.	i) communications within and between the offices of Executive Directors; ii) communications between individual Executive Directors' offices and the member country or countries they represent; and iii) communications between individual Executive Directors' offices and third parties.
Security and Safety	IDB Invest does not disclose Information that could compromise security or safety.	i) Information that would compromise the security of IDB Invest's personnel and their

		families, contractors, or other individuals or that would put IDB Invest's assets at risk if disclosed; ii) Information that could endanger the life, health, or safety of any individual, or the environment if disclosed; iii) Information that could endanger the national security of the member countries if disclosed; and iv) Information about logistical and transport arrangements related to IDB Invest shipments of its assets and documents, and the shipment of personal property belonging to its personnel
Personal Information	Personal Information is not subject to Disclosure. IDB Invest maintains appropriate safeguards to respect and protect the privacy of its personnel and any individual, to protect the confidentiality of their personal Information.	i) personal Information, including personal personnel records, medical Information, and personal communications; and ii) Information relating to personnel appointments and selection processes, internal conflict resolution mechanisms, and investigations of allegations of staff misconduct.

c. Classification of client's Information

57. IDB Invest will notify clients of the Access to Information Policy as early as possible in Investment negotiations.

The general principles for classifying client's Information are the following:

1. When client Information is available to the public, it will be classified as Public.
2. When the client provides Information in confidence or Information that has been identified as confidential, it will be classified as Confidential pursuant to the Commercially Sensitive Information Exception and any other applicable Exception and will not be disclosed.
3. Except where client Information is available to the public or with respect to the Environmental and Social Information as described in Paragraph 66, client Information should not be disclosed unless and until prior, written consent is received from the client. For illustrative purposes, the Information should not be disclosed:
 - a. If the Information provided in confidence by a client is used in or referred to in an IDB Invest document.
 - b. If the client giving the Information to IDB Invest has not indicated how the Information should be treated.

B. Disclosure

1. General aspects

58. To facilitate access to Information under the Policy, IDB Invest will apply the following principles:

1. Openness: IDB Invest has created processes by which people may seek, receive, and convey Information about Investments.

2. Good faith: IDB Invest shares Information about its operations and activities in an appropriate manner in order to support its commitment to transparency and accountability and the need to safeguard Confidential Information.

59. In accordance with these principles, IDB Invest will Disclose Public Information in a homogeneous, efficient and timely manner.

1. Homogeneous: Applying systems and procedures to disclose Information.

2. Efficient: Implementing practical means to achieve and facilitate access to Information.

3. Timely manner: In accordance with the timeframes and milestones established for this purpose in the Policy and these Guidelines.

60. IDB Invest makes Information available to the public in three ways: i) by proactively posting it on the IDB Invest's external website; ii) by responding to Requests (paragraphs XXX); and iii) by providing Historical Information upon request or *ex officio* (paragraphs XXX).

2. Information routinely made available

61. IDB Invest proactively discloses certain routinely available Information through its external website – <https://idbinvest.org/en> – when the Information is finalized after key process milestones have been reached. For more details on the Information that IDB Invest routinely discloses, please see Section III of the Policy.

3. Timeframes

a. General rule

62. Unless otherwise indicated in the Policy or these Guidelines, Information routinely made available will be published within fifteen (15) business days after its approval, clearance (including any clearance by the client, as the case may be), completion of consideration or after the Information has been classified as Public in the Records Management System, as the case may be.

b. Timing for Disclosure of Investment and Environmental and Social Information

63. For Information relating to investments and environmental and social Information, IDB Invest applies the following Disclosure timeframes:

(a) The Investment Summary and the Environmental and Social Review Summary (ESRS) will be disclosed no later than 30 calendar days prior to the Board or Management approving the Investment, as the case may be.

(b) The Environmental and Social Impact Assessment (ESIAs) for category A projects will be disclosed as far in advance as possible and no later than 60 calendar days prior to the Board approving the Investment.

(c) The Project Summary for Advisory Services projects will be disclosed within 60 calendar days of a project's approval.

c. Special procedures

i. Client clearance for Investment Summary and Environmental and Social Information

64. The Project Team Leaders will seek the client's consent on Disclosure of the Investment Summary.

65. Before IDB Invest discloses any Investment or environmental and social Information prepared by IDB Invest, IDB Invest Employees will submit the draft Information for the client's factual verification as discussed under article 43 of the Policy.

66. IDB Invest will inform the client before disclosing the environmental and social Information prepared by the client to be disclosed in accordance with Section B of the Policy, so that the client may inform IDB Invest if there is a need to redact any Confidential Information included in such reports that was not duly identified upon its provision to IDB Invest by the client.

ii. Simultaneous Disclosure

67. Information Classified as Public that Management submits to the Board for Information will be disclosed to the public at the time it is distributed to the Board. Country Strategies, prepared jointly with IDB, will also be disclosed when they are distributed to the Board, subject to the non-objection of the respective country and in line with the IDB Access to Information Policy.

ii. Joint documents

68. Information of a Confidential nature contained in documents prepared jointly by IDB and IDB Invest (a "Joint Document") will be protected such that Information is not inadvertently disclosed. The Author of a Joint Document led by IDB Invest will coordinate with the IDB Group departments or divisions concerned to determine the terms of Disclosure and redact any Information deemed Confidential under the IDB Access to Information Policy and any Information deemed Confidential under the Policy, before finalizing and distributing the document to the Board or the Management-level decision maker.

4. Languages

69. **IDB Invest responsibilities.** IDB Invest will disclose Public Information in all languages available at the time such Public Information is disclosed. If additional translations become available at a later date, IDB Invest will also strive to post those versions on the website. In addition, as a general rule, the ESRS will also be disclosed in one of the national languages of the country in which the project will be implemented. [The ESRS will be considered Disclosed only when it is Disclosed in the applicable national language.]

70. **Client responsibilities.** The Environmental and Social Information produced by the client that is public will be disclosed in one of the national languages of the country in which the project will be implemented. For projects where there are affected communities, the client will communicate in the formats and languages accessible to such communities, in a manner commensurate with the level of risk as specified in the Policy and the Environmental and Social Sustainability Policy.

5. Redaction

71. Redaction is the process of blacking out or covering Confidential text with a thick black line to make the Confidential text illegible, for purposes of creating a Public version of a document that contains both Public and Confidential Information.

72. In the case of a redacted document, the Author must provide an explanation for non-Disclosure inside the document, indicating the applicable Exceptions to justify non-Disclosure.

73. When the Author decides to redact a document, both the original version and the redacted Public version will be saved in the Records Management System. The Public version will be available for Disclosure on the external website while the original version, containing the complete, unredacted text, will be classified as Confidential.

74. When the Confidential Information is so extensive that it is not practical to make the document available to the public, IDB Invest may disclose a summary of such document.

6. Environmental and Social Information

1. Early Disclosure

75. For Category A projects, the Team Leader shall prepare a brief summary of the Investment and the Environmental and Social Officer shall obtain the ESIA and other relevant environmental and social documentation from the client to prepare the Environmental and Social Strategy Summary (ESS) early on during project appraisal and prior to carrying out the Environmental and Social Due Diligence (ESDD). The ESS includes the initial environmental and social risk categorization, a brief description of any relevant studies (i.e. ESIA) being prepared, and the proposed general approach for IDB Invest's ESDD. Once the ESDD is carried out an Environmental and Social Review Summary (ESRS) will be prepared and disclosed as per Paragraph 79 below.

76. For Investments with high environmental or social risk, IDB Invest will disclose the ESIA early in IDB Invest's environmental and social evaluation process. For these projects, IDB Invest will provide access via the IDB website to the preliminary version of the ESIA prepared by the client even before IDB Invest has completed, or in some cases before starting, the review of the Investments. IDB Invest discloses the ESIA's for

category A projects as far in advance as possible and no later than 60 calendar days prior to the Board approving the Investment. IDB Invest discloses the ESIA's or other environmental and social evaluations required for projects other than category A projects no later than 30 calendar days prior to approval of the Investment.

2. Delayed Disclosure

77. According to article 60 of the Policy, IDB Invest may delay the Disclosure of Information that it would otherwise make publicly available because of: (a) market conditions and (b) legal or other regulatory requirements such as timing requirements relating to securities offerings, equity investments in publicly listed companies, purchases of shares in a private placement or a financial restructuring.

78. On a case by case basis, this Information will be Disclosed as soon as the market sensitivities expire, or legal and/or regulatory requirements permit.

3. Environmental and Social Review Summary (ESRS)

79. For direct investments (Category A, B, or C projects), as part of the Investment Summary, IDB Invest produces and Discloses an Environmental and Social Review Summary (ESRS) that includes the conclusions and recommendations resulting from its own evaluation. The ESRS includes: i) the rationale for IDB Invest's categorization of a project; ii) a description of the main environmental and social impacts and risks of the project; iii) key measures identified to mitigate the referenced risks and impacts, specifying any supplemental actions that will need to be implemented to undertake the project in a manner consistent with IDB Invest's Environmental and Social Sustainability Policy and, where required by IDB Invest, the Environmental and Social Action Plan (ESAP); iv) electronic copies or web links to the ESIA or other environmental and social impact evaluations prepared by or on behalf of the client whenever relevant and available; v) description of the status of the process of the free, prior, and informed consent of indigenous peoples, for projects that require such verification; and vi) general Information on the Independent Consultation and Investigation Mechanism (ICIM) including a link to the ICIM webpage.

80. When IDB Invest Invests through a **financial intermediary** (FI) such as a bank, an investment fund or another specialized institution such as a factoring company, a leasing company, or microfinance institutions, such Investment is categorized as an FI Investment. IDB Invest Discloses the following environmental and social Information through the ESRS: i) rationale for IDB Invest's categorization of the FI investment; ii) a description of the main environmental and social risks and impacts of the FI investment; and iii) key measures identified to mitigate the referenced risks and impacts, specifying any supplemental actions that will need to be implemented to undertake the FI investment in a manner consistent with the IIC Environmental and Social Sustainability Policy and, where required by IDB Invest, the ESAP.

4. Materials provided by the client for Public Consultation

81. Regarding Investments with high environmental and social risk, IDB Invest may disclose explanatory, nontechnical materials produced by the client in the context of public consultation on the projects, which have been made available to the public.

5. Suitable for Disclosure elements for Environmental and Social Information

82. A document would be considered suitable for Disclosure when it is in an advanced stage of development and incorporates the main elements of the relevant study as described in the IDB Invest Environmental and Social Sustainability Policy or its set of standards.

Environmental and Social studies, plans or information:	Key elements included in PS:
Environmental and Social Impact Assessments	Guidance Note 1 to PS1 (Section GN23)
Environmental and Social Audits	Guidance Note 1 to PS1 (Section GN30)
Grievance Mechanism for Affected Communities	Guidance Note 1 to PS1 (Section GN110)
Grievance Mechanism for Workers	Guidance Note 2 to PS2 (Sections GN57 - GN 60)
Resettlement Action Plan	Guidance Note 5 to PS5 (Annex A)
Biodiversity Action Plan and Biodiversity Management Plan	Guidance Note 6 to PS6 (Annex A)

6. Information updates

83. Investment Summary: IDB Invest will update the Investment Summary as necessary.

84. ESRS: For Category A Projects approved after the entry into force of the Policy, IDB Invest will disclose progress on the implementation of the ESAPs included in the original ESRS published by IDB Invest on an annual basis.

85. Investee Companies reached through indirect Investments: With the consent of the corresponding private equity fund and protecting Confidential Information in accordance with the Access to Information Policy Exceptions in Section IV, IDB Invest will disclose the names of the investee companies in which IDB Invest made an indirect Investment through a private equity fund, when such Information becomes available.

7. Confidential Environmental and Social Information

86. Consistent with the Exceptions to Disclosure set forth in the Policy, environmental and social Information that is typically considered Confidential includes, Information on compensation to individuals included in the resettlement plans or in other agreed plans, reports on grievance mechanisms, Confidential Information contained in impact studies, and Confidential Information on environmental and social matters of the client received by IDB Invest during the due diligence process, among others.

8. IDB Invest's Portfolio: Aggregate data on the Environmental and Social Risk distribution of the Portfolio

87. IDB invest will make publicly available on an annual basis the Environmental and Social risk distribution of its portfolio based on the environmental and social risk categorizations of IDB Invest's active investments.

9. Development Impact Results

1. Investments: Development Impact Indicators

Pre-approval stage:

88. For each Investment, IDB Invest will include an “expected development impact” summary in the Investment Summary (the “Expected Development Impact”). The Expected Development Impact will be tailored to each Investment and present a brief and general description of the primary output and outcome indicators¹ expected to be monitored from such Investment. This summary will protect any Confidential Information, as agreed with the client and in accordance with the Policy Exceptions. The Team Leader will request the client’s consent to Disclose the expected development impact summary in the Investment Summary. Once IDB Invest has the client’s written consent, the text will be uploaded to the Investment Summary of the operation.

Post-approval stage:

89. For each Investment, and once the project is completed, IDB Invest will include a summary of the “achieved development impact” in the Investment Summary (the “Achieved Development Impact”). The Achieved Development Impact will be tailored for each Investment and present a brief and general description of the results reported in the Expanded Supervision Report (XSR).² The Team Leader will request the client’s consent to disclose the Achieved Development Impact in the Investment Summary. This summary will protect any Confidential Information, as agreed with the client and in accordance with the Policy Exceptions. Once IDB Invest has the client’s written consent, the summary will be uploaded to the Investment Summary.

90. Once IDB Invest and a client have identified a concrete area of support involving an in-depth evaluation, IDB Invest will prepare a “Client Support Evaluation Agreement” that will be signed by the client and IDB Invest. This agreement will outline the scope of the study, the contributions expected from the client and IDB Invest, copyright and results Disclosure procedures, among others. It is expected that the results from all in-depth evaluations completed and supported by IDB Invest will be first shared with the client and later made public, with the client’s consent. The Client Support evaluation will protect any Confidential Information, as agreed with the client and in accordance with the Policy Exceptions. The results from impact evaluations will be published on IDB Invest’s “Development through the Private Sector” technical note series and disseminated accordingly, following the established protocol for publication.

2. Advisory Services: Development Impact Results

¹ Indicators included in the results matrix of every operation should be SMART. This means they should be: Specific, Measurable, Attainable, Relevant, and Time-Bound.

² The XSR is the final evaluation report of a project prepared once it reaches Early Operating Maturity (EOM). As explain in detail in the XSR Guidelines, the EOM definition varies across project type and financial instrument and follows the Good Practice Standards for Private Sector Evaluation established by the Evaluation Cooperation Group of the Multilateral Development Banks. In general, EOM is defined by the date when the loan has been fully disbursed, the project has been implemented, and has started to have development impact. The XSR is produced by the Development Effectiveness Division (DVF) with inputs from the Portfolio Management Division (PTM), the Social, Environmental and Governance Division (SEG), and the Investment Operations Department (INO).

91. An Advisory Services Project (ASP) is an IDB Invest operation that assigns resources from Donor Trust Funds, IDB Invest and/or IDB's own capital/resources, to finance the purchase of goods and/or services for the provision of Advisory Services. ASP's are therefore used to assign resources to a series of eligible activities or expenses and forms of financing, determined according to the corresponding funding source. ASPs are also known as Technical Cooperation operations.

92. At Approval. Within 60 calendar days of the Advisory Services Project approval, IDB Invest will disclose the expected development impact results (the "Expected Development Impact") by providing a brief summary of the outputs expected to be achieved throughout the implementation of the Advisory Services Project and specifying how these outputs will contribute to achieving development impact, as long as such information does not contain confidential information as contemplated under the Policy Exceptions in Section IV. Such outputs relate to fund-level standard indicators, which are defined in the ASP's Results Matrix and set out by the corresponding funding source. The "Expected Development Impact" summary, as well as other descriptive information of the Advisory Services Project, as applicable and defined in the Advisory Services Project Disclosure Template, will be published in IDB Invest website. Advisory Services Projects Team Leaders are responsible for ensuring that all information associated with their respective projects are disclosed according to the applicable policy.

C. Procedures

A. Requesting Information

1. Procedure for Requesting Information

93. Public Information on IDB Invest and its activities is available online at its website: <https://idbinvest.org/en>. Information that is available for Disclosure under the Policy but is not posted on the IDB Invest website is available upon request.

94. IDB Invest Information may be requested through the following channels:

Submitting a Request for Information	
By virtual form available on the website	https://idbinvest.org/en
By e-mail as indicated on the website	XXXX
By written request to IDB Invest at the address stated on the website https://idbinvest.org/en	1350 New York Avenue NW. Washington, DC. 20577, USA
By calling IDB Invest at the phone number indicated on the website https://idbinvest.org/en	XXXX

a. Requests Received by Employees

95. If a member of the public approaches an IDB Invest Employee with a Request for Information, the Employee may provide the requested Information if it is readily available on the IDB Invest external website. If the Information is not already available, the Employee must direct the Requester to the virtual form or input the Information on the virtual form to be addressed by the Transparency Hub. All Information denials must be channeled through the Transparency Hub. If the Requester does not have access to the Internet, he or she will be directed to call, mail, or visit IDB Invest headquarters, or the relevant country office.

b. Requirements

96. A Request for Information must indicate, with reasonable specificity, the requested Information that is being sought to enable IDB Invest to locate the Information. If a particular document is required, it should be identified as precisely as possible. Requesters are not required to provide any reason or proof of interest for their Request.

c. Unreasonable or Unsupported Requests

97. IDB Invest may refuse unreasonable or unsupported Requests for Information. Unreasonable requests include multiple requests, blanket requests, and those that require IDB Invest to create, develop, or collate Information or data that does not already exist or is not available in its Records Management System. Unsupported Requests include those that: (i) do not provide enough Information to enable IDB Invest to locate the requested Information in its Records Management System; and/or (ii) IDB Invest is unable to locate in its Records Management System after a reasonable search.

d. Clarifications

98. When a Request is insufficiently clear or precise to identify the requested Information or is unreasonably broad, IDB Invest reserves the right to ask the Requester to provide clarifications or to narrow the scope of the Request. If the Requester does not provide sufficient clarification, IDB Invest will refuse the Request pursuant to Paragraph 71 of the Policy.

e. Timing

99. In the case of unreasonable or unsupported Requests or when the Requester does not provide the requested clarification, the Transparency Hub will inform the Requester of the decision to refuse the Request within 30 calendar days of receiving the Request, indicating the reason for refusal. If IDB Invest requires additional time to respond, it will contact the Requester in writing to inform such Requester of the delay and provide an estimated timeframe for its response.

f. Confidentiality

100. Requesters must provide their necessary contact Information to allow IDB Invest to respond to the Request. IDB Invest will maintain the identity of the Requester Confidential when the Requester so requests. The Requester must inform IDB Invest of their request for confidentiality in the initial Request to allow IDB Invest to safeguard their identity. If a request for confidentiality is informed at a later time, IDB Invest will make its best effort to honor such confidentiality to the extent possible. Anonymous

requests will not be considered. IDB Invest is not responsible for the Disclosure of any Requester's identity under any circumstances.

g. Languages

101. Requests for Information may be submitted in any of the four official languages of IDB Invest, which are English, Spanish, French or Portuguese. IDB Invest will make its best effort to respond in the language the Request was received. The requested Information will be provided in the language in which it is available in the Records Management System.

2. Responding to requests

a. Responding to Requests

102. In responding to requests, IDB Invest determines whether Information requested may be made available to the public in accordance with the Policy.

b. Acknowledgement of Requests

103. IDB Invest will acknowledge receipt of Requests for Information within five business days of receiving the Requests.

c. Timing for Response

104. IDB Invest will endeavor to provide its response as quickly as possible within a maximum period of 30 calendar days following receipt of the Request. If IDB Invest requires additional time to respond because of the scope or complexity of the Request, it will contact the Requester in writing to inform such Requester of the delay and provide an estimated timeframe for its response.

d. Available Information

105. If the Transparency Hub finds that the Information requested is Public and already disclosed on IDB Invest's external website, it will send the Requester the link to the specific webpage or downloadable file. If a Request concerns Information that is classified as Public under the Policy but has not been disclosed, the Transparency Hub will send the Request to the relevant IDB Invest Division Chief to confirm that it was properly classified as Public, and coordinate efforts for the requested Information to be disclosed in the Transparency Hub.

e. Search for Information

106. If the requested Information is eligible for public access but cannot be found in the Records Management System, IDB Invest will conduct a reasonable search for such Information. The Transparency Hub will contact the relevant Division Chief and will ask him or her to request that the relevant Employees search for the Information. Following the search, the Division Chief will confirm that a reasonable search has been conducted, and that all relevant substantive Information identified has been filed in the Records Management System and properly classified.

f. Providing Requested Information

107. Typically, IDB Invest will make the Information available on its external website and share the electronic link with the Requester. If the situation requires it, IDB Invest will send the Requester the Information physically or by email. IDB Invest may make the Information available to the Requester at IDB Invest's offices for consultation.

g. Information Denials

108. IDB Invest may deny a request for Information when it determines that the Information requested is Confidential under the Policy Exceptions. Whenever IDB Invest denies a Request for Information, it will explain the reasons for its decision to the Requester, indicating the Policy Exception under which the Information is considered Confidential, and inform the Requester of the right to request a review of the Denial. All Information Denials must be channeled through the Transparency Hub.

h. Independent Offices Information

109. Requests for Information produced or received by Independent Offices will be received and acknowledged by the Transparency Hub following the general procedure to request Information indicated in these Guidelines. The Transparency Hub will send the Request to the Independent Office who will consider the Classification of the requested Information according to the Policy Exceptions and will produce the response to the Request. The Transparency Hub will send such response to the Requester.

i. Costs

110. Information is made available in digital form free of charge on IDB Invest's external website. IDB Invest may charge reasonable fees for the cost of providing digital or hard copies of the requested Information, particularly for Requests that are complex or time-consuming. The Administration Committee is responsible for establishing such reasonable fees, which will not exceed expenses incurred.

3. Client and Third-Party Information

a. Responding to Requests for Client or Third-Party Information

111. When the Transparency Hub receives a Request for Information that belongs or relates to a client or a third-party, IDB Invest will consult with such client or third party on whether the Information requested is Confidential as contemplated under the Policy Exceptions.

b. Procedure

112. The Division Chief will notify the client or third-party about the Request, identifying the requested Information and asking the client or third-party to confirm whether the Information requested may be disclosed, giving the client or third-party 15 calendar days to respond to IDB Invest.

4. Historical Information

113. Information produced or received before the entry into force of this Policy on January 1, 2020, will be considered Historical Information. Historical Information may be made publicly available upon request or *ex officio*.

a. Responding to Requests for Historical Information

114. Pursuant to the Policy, Historical Information is information produced or received before the entry into force of the Policy. IDB Invest will respond to Requests for Historical Information following the parameters established in the information policy in effect at the time the Historical Information was produced or received.

b. Process

115. The Transparency Hub will receive and acknowledge Requests for Historical Information within five business days of receiving the Requests and will send the Requests to the Division Chief to locate the Information and review its content. If the Division Chief cannot locate the Information, he/she will send a Request to Records Management in order to locate such Information. Once located, Records Management will send the Information back to the Division Chief, who will be responsible for reviewing the content of the Information to determine whether it is eligible for Disclosure pursuant to Paragraph 114 above.

c. Timing for Response

116. IDB Invest will endeavor to provide its response to Requests for Historical Information as quickly as possible within a maximum period of 30 calendar days following receipt of the request. If IDB Invest requires additional time to respond because of the scope or complexity of the request, it will contact the Requester in writing to inform such Requester of the delay and provide an estimated timeframe for its response.

5. Emergency needs for Information

a. Procedure

117. Emergency needs for Information Requests will be submitted through the virtual form available on the website: <https://idbinvest.org/en>. In its Request, the Requester will indicate the need for immediacy, providing the reasons that support an expedited response. Aside from timing considerations, IDB Invest will follow the procedure indicated in Section 2 above of this Guideline for answering Information Requests.

b. Decision

118. The Division Chief will consider the arguments provided by the Requester and, if considered reasonable, will endeavor to provide a response as quickly as possible, no later than 10 calendar days of receiving the Request. If IDB Invest does not consider that the reasons provided warrant such treatment, IDB Invest will provide a response to the Request within the general timeframe indicated in Paragraph 104 of these Guidelines. In such cases, IDB Invest will inform the Requester of the estimated time for response.

6. System for Tracking External Requests for Information

119. IDB Invest established an automated online Request system managed by the Transparency Hub to track Requests for Information. The online Request system is intended to promote compliance with the Policy and timely responses to inquiries. The system is not intended to curtail conversation between IDB Invest Employees and outside parties about the work of IDB Invest. When an Employee receives an Information Request from an outside party, they can provide Public Information following the procedure set in Paragraph 95.

a. Workflows

120. The tracking system will include all possible workflows for Information Requests to follow, including the following:

- Standard Requests: when the requested Information is already available in IDB Invest external website.
- Complex Requests: when consultation to the relevant IDB Invest division is necessary prior to responding the Request, in order to confirm the correct Classification of the Information under the Policy.
- Historical Requests: when the requested Information precedes the entry into force of the Policy on January 1, 2020.
- Board Records Requests: when the requested Information refers to records created by the Board, such as agendas and minutes of Board meetings.
- Requests for review: when a decision to deny access to Information is appealed before the Administration Committee, the External Panel or the Board of Executive Directors, as applicable.

8. Review Process

121. Following a Request for Information, a Requester may request a review of IDB Invest Management decisions to deny access to Information. The Policy establishes a two-stage review mechanism: (i) a first-stage review by the Administration Committee and (ii) a second-stage review by the External Panel in cases where the Administration Committee upholds Management's decision to deny the requested Information. For Information Denials involving Board Records, the Requester will have a one-stage review process before the IDB Invest Board of Executive Directors.

a. Requesting review

122. All requests for a first or second stage review must be submitted within 30 calendar days of the date of the notification of the Information Denial. Requests for review must be submitted to the Transparency Hub in writing. Requests for review must be presented in one of the four official languages of the IDB Invest and include:

1. The Requester's contact information;
2. Date of the initial Request for Information;
3. Date(s) of the notification of the decision(s) denying access to Information, as applicable;
4. Detailed description of the Information requested; and
5. Statement explaining the Requester's basis for submitting the Request for Review.

b. Acknowledgement

123. The Transparency Hub will acknowledge the Request for Review within 5 business days and will forward it to the Administration Committee if it involves a first-stage review or to the External Panel if it involves a second-stage review.

c. Remedy

124. The sole remedy for a Requester who prevails on a Request for Review is access to the requested Information.

d. Submitting Requests for Review

125. Requests for review must be presented to the Transparency Hub in writing (i) by replying to the Information Denial notification in the link provided by the system; (ii) by e-mail as provided on the website: <https://idbinvest.org/en>, indicating the Request number; or (iii) by sending a request to the address stated on the website: <https://idbinvest.org/en>, currently 1350 New York Avenue NW. Washington, DC. 20577. USA, or to the relevant country office, indicating the Request number.

e. Acknowledgement of Requests

126. All communications between IDB Invest and Requesters will be sent through the system, by e-mail, or regular mail, if no e-mail address is available.

f. Responding to Requests for Review

127. After the Administration Committee or the External Panel, as the case may be, reaches a decision concerning a Request for Review, the Transparency Hub will notify the Requester of the decision. The notice will specify the reasons for the decision, and if applicable, the process for accessing the requested Information.

1. Administration Committee

a. First-stage Review

128. The Administration Committee conducts first-stage reviews of Information Denials that do not relate to Board Records. The Administration Committee has the authority to uphold or reverse Management's Information Denials.

b. Procedure

129. Requests for first-stage reviews must be submitted in writing, within 30 calendar days of Management's notification of the Information Denial. The Administration Committee will decide on the Request for Review in writing within 30 calendar days of the receipt of the written Request. If the Administration Committee requires more time to reach a decision, it will notify the Requester in writing, providing an estimated date for the decision. In reaching its decision, the Administration Committee may request input and recommendations from relevant IDB Invest departments.

c. Decisions

130. In reaching a decision, the Administration Committee will determine whether Management's Information Denial properly applied the provisions of the Policy. All decisions will specify the reasons for the decision and in cases where the Administration Committee reverses the Information Denial, it will include the Requested Information in its response.

d. Disclosure

131. The Transparency Hub will post the Administration Committee decisions on Requests for Information on IDB Invest external website and forward a copy of the decision to the Requester within five (5) business days of the decision being rendered. When requested, the identity of the Requester will be kept Confidential. Decisions of the Administration Committee on matters not related to the Policy are deemed Confidential.

2. External Panel

a. Second-stage review

132. If the Administration Committee decides to deny the Request for Disclosure, the Requester may request a second-stage review of the Information Denial by the External Panel. The External Panel is composed of three independent experts on Access to Information and transparency issues in the Latin American and Caribbean Region with focus on the private sector. Experts will be nominated by an IDB Invest multidisciplinary group.

133. The External Panel has the authority to uphold or reverse the Administration Committee's decisions on Information Denials. External Panel's decisions are final and not subject to further review.

b. Procedure

134. Requests for Review by the External Panel must be submitted to the Transparency Hub in writing within 30 calendar days of the date of the Administration Committee's decision notification. Within 30 calendar days of receipt of the request, the External Panel will review the Administration Committee's decision and make a final decision on whether the requested Information should be disclosed in accordance with the Policy. If the External Panel requires more time to reach a decision, it will notify the Requester in writing, providing an estimated date of decision.

c. Decisions

135. In reaching a decision, the External Panel will determine whether the Administration Committee properly applied the provisions of the Policy when deciding to uphold Management's Information Denial. The scope of the External Panel's review will be circumscribed to whether the Administration Committee had a reasonable basis for its Denial. The decision will be determined by a unanimous vote. All decisions will clearly specify the reasons for the decision and in cases where the External Panel reverses the Information Denial, it will include the requested Information.

d. Disclosure

136. The Transparency Hub will post the External Panel decisions on the IDB Invest external website and forward a copy of the decision to the Requester within five (5) business days of the decision being rendered. When requested, the identity of the Requester will be kept confidential.

3. Board of Executive Directors

a. One-Stage Review of Board Records

137. For Requests involving Management's Information Denials regarding Board Records, a Requester may seek a review by the Board of Executive Directors. The Board of Executive Directors has the authority to uphold or reverse Management's Information Denials regarding Board Records. Board's decisions are final and not subject to further review.

b. Procedure

138. Requests for review by the Board must be submitted to the Transparency Hub in writing within 30 calendar days of the date of Management's decision notification. The Board shall endeavor to render its decisions within 30 calendar days of receipt of the Request. If the Board requires more time to reach a decision, it will notify the Requester in writing, providing an estimated date of decision. In reaching its decision, the Board may request input and recommendations from the Administration Committee or relevant IDB Invest departments.

c. Decision

139. In reaching a decision, the Board will determine whether Management's Information Denial properly applied the provisions of the Policy. All decisions will specify the reasons for the decision and in cases where the Board reverses the denial of a Request, it will include the requested Information.

d. Disclosure

140. The Transparency Hub will post Board decisions on Requests for Information on the IDB Invest external website and forward a copy of the decision to the Requester within five (5) business days of the decision being rendered. When requested, the identity of the Requester will be kept confidential.

B. Positive Override

1. Positive Override

141. In exceptional circumstances, IDB Invest reserves the right to Disclose Information that it would ordinarily not release to the public in accordance with the Policy.

i. Scope

142. IDB Invest may exercise this right if, in connection with an Investment or Advisory Services project, IDB Invest's Management determines that the Disclosure of certain non-public Information would be likely to avert serious and imminent harm to public health, security, and/or imminent and significant adverse impacts on the environment.

In such cases, the Information would be Disclosed on the most restricted basis necessary to achieve the intended purpose.

ii. Client Information

143. If the Confidential Information has been provided by or relates to an IDB Invest client, IDB Invest would make such Disclosure only after informing the client of IDB Invest's concerns and considering the client's plans to address and mitigate the potential harm involved.

2. Decisions on Positive Override

144. The Administration Committee decides on Positive Override regarding Information other than Board Records that is deemed Confidential. The Administration Committee's decisions are final and not subject to review.

i. Procedure

145. Management will request the Positive Override to the Administration Committee indicating the reasons that justify the request. The Administration Committee will have 72 hours to provide an answer to the request, indicating whether the relevant Information can be disclosed in the specific circumstances and providing an explanation for its decision.

iii. Disclosure

146. Management will post the Administration Committee decisions on any Positive Override IDB Invest external website within five (5) business days of the decision being rendered.

3. Request for Positive Override of Board Records

147. The Board of Executive Directors decides on Positive Overrides regarding Board Records that are deemed Confidential. The decisions by the Board regarding Positive Overrides are final and not subject to review.

i. Procedure

148. Management will request the Positive Override of Board Records to the Board indicating the reasons that justify the request. The Board will have 72 hours to provide an answer to the request, indicating whether the relevant Information can be Disclosed in the specific circumstances and providing an explanation for its decision.

iii. Disclosure

149. Management will post the Board decisions on the IDB Invest external website within five (5) business days of the decision being rendered.

D. Policy Review

1. Implementation Progress

150. The Access to Information Group shall report to the Board on implementation activities and results, which will be included in the IDB Invest Annual Report.

2. Review procedure

151. The Policy shall be subject to review by the Board. The Administration Committee is responsible to prepare recommendations, proposals and updates to the Board of Executive Directors. The review process will take into consideration best practices, international trends on access to Information, and lessons learned during the implementation of the Policy.