# **Bank Procedure**

# Access to Information

# **Bank Access to Information Policy Designation**

**Public** 

# **Catalogue Number**

ECR4.01-PROC.135

# Issued

November 13, 2024

# **Effective**

November 13, 2024

# Content

This Procedure sets forth the procedures for the implementation of the Bank Policy: Access to Information (Policy).

# Applicable to

IBRD,IDA

#### Issuer

Vice President, ECRVP

# **Sponsor**

Director, ECRRC

# SECTION I – PURPOSE AND APPLICATION

- 1. This Procedure sets forth the procedures for the implementation of the Bank Policy: Access to Information (Policy).
- 2. This Procedure applies to the Bank.

# **SECTION II – DEFINITIONS**

The terms used in this Procedure have the meanings set forth in (a) Section II of the Bank Policy: Access to Information, (b) Section II of the Bank Directive: Access to Information, and (c) below, including their respective successors thereto.

- 1. **Administrative Tribunal**: the administrative tribunal established pursuant to the Statute of the Administrative Tribunal of the International Bank for Reconstruction and Development, International Development Association, and International Finance Corporation, as adopted by the Board of Governors on April 30, 1989, as amended.
- 2. **Annual Meeting**: the annual meeting of the Board of Governors of the World Bank Group.
- 3. **Annual Report**: annual report of the Bank.
- 4. **Annual Reports of Board Committees**: annual reports of the Board Committees, as the term is defined in the Policy.
- 5. **ASA**: Advisory Services and Analytics.
- 6. **Audited Financial Statements**: a project implementing entity's financial statements, together with the auditors' opinion, as required by the provisions of a Loan agreement.
- 7. **Bank guarantee**: guarantee issued by the Bank in accordance with, as relevant, OP/BP 8.60, *Development Policy Financing*, or IPF Policy/Directive.
- 8. **BPs**: operational Bank procedures.
- 9. **BPS**: Budget, Performance Review and Strategic Planning vice presidency of the World Bank.
- 10. *Call for Proposals*: solicitation for proposals to finance projects under an institutional or trust fund program.
- 11. **CAS**: Country Assistance Strategy.
- 12. **Category A**: as the term is defined, as relevant, in OP 4.01, *Environmental Assessment*, and in BP 4.03, *Performance Standards for Private Sector Activities*.

- 13. **Category B**: as the term is defined, as relevant in OP 4.01, *Environmental Assessment*, and in BP 4.03, *Performance Standards for Private Sector Activities*.
- 14. **Category FI-1**: as the term is defined in BP 4.03, *Performance Standards for Private Sector Activities*.
- 15. **Category FI-2**: as the term is defined in BP 4.03, *Performance Standards for Private Sector Activities*.
- 16. **Committee on Development Effectiveness** or *CODE*: the committee of the Board that, *inter alia*, supports the Board in assessing the development effectiveness of the World Bank Group.
- 17. **Concept Review**: a review through which a management decision is made on whether to proceed with the preparation of an IPF operations described in paragraph 7, Section III, of IPF Directive.
- 18. **Corporate Secretary**: the corporate secretary of the Bank.
- 19. Corporate Secretariat or SEC: the corporate secretariat of the Bank.
- 20. **Country Engagement Note**: as the term is defined in *World Bank Group Directive:* Country Engagement, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
- 21. **Country Financing Parameters** or **CFPs**: parameters that provide the overall framework for Bank financing for all projects in a country.
- 22. **Country Partnership Framework** or **CPF**: as the terms are defined in the *World Bank Group Directive: Country Engagement*, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
- 23. **Country Performance Ratings** or **CPR**: ratings used to allocate IDA's resources and are based on the CPIA ratings for IDA-eligible countries and a portfolio performance rating.
- 24. *CPF*: Country Partnership Framework.
- 25. CTR: Controller's vice presidency of the Bank.
- 26. **Debt Sustainability Analysis**: report assessing a country's public and external debt sustainability.
- 27. **DEC**: Development Economics vice presidency of the Bank.
- 28. **DECDG**: the development data group of DEC.
- 29. **Development Committee**: the joint ministerial committee of the Boards of Governors of the Bank and the IMF on the transfer of real resources to developing countries.

- 30. **Development Marketplace**: a grant program that identifies and funds innovative, early-stage development projects that are scalable and/or replicable, while also having high potential for development impact.
- 31. **DFI**: Development Finance vice presidency of the Bank.
- 32. **DGF**: Development Grant Facility, as the term is defined in this Directive.
- 33. **Documents and Reports**: the official disclosure mechanism for the World Bank Group's final reports.
- 34. *EA*: Environmental Assessment, as the term is defined in this Directive.
- 35. *ECR*: External and Corporate Relations vice presidency of the WBG.
- 36. **ED**: Executive Director, as the term is defined in the Policy.
- 37. **EDs Portal**: a portal designed to provide resources for EDs.
- 38. **EFO**: Externally Financed Outputs, as the term is defined in this Directive.
- 39. **Environmental Action Plan**: as the term is defined in OP/BP 4.02, *Environmental Action Plans*.
- 40. **Environmental Assessment** or **EA**: an assessment prepared pursuant to OP/BP 4.01, *Environmental Assessment*.
- 41. **Externally Financed Outputs** or **EFO**: instrument for receiving external contributions to support the Bank's work program.
- 42. **eSubmission**: the system for electronic submission of papers to the Board.
- 43. **ESCP**: Environment and Social Commitment Plan.
- 44. **ESF:** Environmental and Social Framework.
- 45. **ESW**: Economic and Sector Work, as the term is defined in the Policy.
- 46. *FTD*: Factual Technical Document, as the term is defined in the Policy.
- 47. **Fund Relations Note**: note that coveys the views of the IMF and that becomes part of the Program Document of a DPF/DPO.
- 48. **General Procurement Notice**: or **GPN**: as the term is described in the Procurement Guidelines, or the Procurement Regulations for IPF Borrowers, as applicable.
- 49. **Grant Monitoring Report** or **GMR**: a report on the progress and results of grant-financed activities.
- 50. **GMR**: Grant Monitoring Report, as the term is defined in this Directive.

- 51. **Guarantee Agreement**: guarantee agreement, as relevant, between a member country and the Bank providing for the guarantee of a Loan made by the Bank in a lending operation, or between the Bank and a guaranteed party in a Bank guarantee operation.
- 52. **IDA Financing Agreement**: agreement for IDA financing.
- 53. **IDA Resource Allocation Index** or **IRAI**: an index that is based on the results of the annual CPIA exercise that covers the IDA eligible countries.
- 54. **IDF**: Institutional Development Fund, as the term is defined in this *Directive*.
- 55. **IDU**: the internal documents unit of the World Bank.
- 56. **Documents & Reports Internal**: the primary repository for formal reports, research papers, and operational documents of the World Bank Group.
- 57. *IMF Transparency Policy*: the policy of the IMF that establishes guidelines for the release of IMF Executive Board documents to the public.
- 58. *Impact Evaluation Report*: a report that sets forth an impact evaluation, which assesses changes that can be attributed to a particular project, program or policy.
- 59. *Implementation Status and Results Report* or *ISR*: report on project or program implementation.
- 60. *Information Statement:* the Bank's prospectus prepared annually for IBRD bondholders.
- 61. *Indemnity Agreement*: an agreement in which, among other things, one party to the agreement agrees to pay costs, liabilities and other amounts associated with the events specified in the agreement.
- 62. **Indigenous Peoples Plan** or **IPP**: as the term is defined in OP/BP 4.10, *Indigenous Peoples*.
- 63. *Indigenous Peoples Planning Framework* or *IPPF*: as the term is defined in OP/BP 4.10, *Indigenous Peoples*.
- 64. **Investment Project Financing** or **IPF**: loans, credits, grants and guarantees extended by the Bank pursuant to IPF Policy and Directive to provide financing for activities aimed at creating physical and social infrastructure necessary to reduce poverty and create sustainable development.
- 65. IPF Directive: Bank Directive, "Investment Project Financing."
- 66. IPF Policy: Bank Policy, "Investment Project Financing."
- 67. *IPP*: Indigenous Peoples Plan, as the term is defined in this Directive.
- 68. *IRAI*: IDA Resource Allocation Index, as the term is defined in this Directive.

- 69. **ISDS**: Integrated Safeguards Datasheet, as the term is defined in the Policy.
- 70. **LDP**: Letter of Development Policy, as the term is defined in the Policy.
- 71. **LEG**: Legal vice presidency of the Bank.
- 72. **LEGDF**: the development finance practice group, LEG.
- 73. **LEGFI**: the finance practice group, LEG.
- 74. **LEGSG**: the structured finance and guarantees practice group, LEG.
- 75. LRC: the law resource center of the Bank.
- 76. **Level One restructuring**: restructuring of a Project involving certain modifications as set forth in IPF Policy, or PforR Policy for level one restructurings.
- 77. **Level Two restructuring**: restructuring of a Project involving certain modifications as set forth in IPF Policy, or PforR Policy, for level two restructurings.
- 78. **Management**: the President or a Manager of the Bank, or a chief officer whose functions and responsibilities include the authority to issue P&P Documents as set out by Management through terms of reference or a delegation of authority, or some or all of these persons, as applicable.
- 79. **Management Discussion and Analysis** or **MD&A**: the management discussion and analysis that accompanies the Bank's annual financial statements and presents selected financial data, e.g., average cost of borrowings, average interest rate on loans, return on liquid investments on loans, other financial ratios that management deems significant, financial product information, discussion of the Bank's financial policies and risk management strategies, and discussion of significant operating results. A condensed MD&A, which serves as an update of the fiscal year, accompanies the quarterly financial statements (which are not audited, but reviewed by the Bank's external auditors).
- 80. **Manager**: a person identified as a manager in the Bank's human resources system.
- 81. **MD&A**: Management Discussion and Analysis, as the term is defined in this Directive.
- 82. *Mid-cycle Implementation Progress Report* or *MCIPR*: report prepared when a strategy is still relevant and its implementation is under way.
- 83. **MOP**: Memorandum of the President, as the term is defined in the Policy.
- 84. *NCO*: Note on Cancelled Operation, as term is defined in the Policy.
- 85. **OPCS**: Operations Policy and Country Services vice presidency of the Bank.
- 86. **OPs**: operational policies of the World Bank.

- 87. **Operational Manual**: the Bank's operational manual that contains the Ops, BPs, directives, and OpMemos on the conduct of Bank operations.
- 88. **Operations Workspace**: a portal designed to centralize the preparation, clearance and disclosure of operational documentation throughout the project cycle.
- 89. **OpMemos**: interim operational instructions to staff.
- 90. **P&P Document**: a document defined in Section II.10 of the Bank Policy, "Policy and Procedure Framework."
- 91. **PBG**: Policy based guarantee, as the term is defined in OP 8.60, *Development Policy Financing*.
- 92. **PD**: Program Document, as the term is defined in the Policy.
- 93. **Performance and Learning Review**: as the term is defined in the *World Bank Group Directive: Country Partnership Framework*, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
- 94. **PID**: Project Information Document, as defined in this Directive.
- 95. **Policy Based Guarantee** or **PBG**: as the term is defined in OP 8.60, *Development Policy Financing*.
- 96. **Preparation Advance Agreement**: an agreement between the Bank and a borrower to receive a preparation advance.
- 97. **Private Sector Activity**: as the term is defined in OP 4.03, *Performance Standards for Private Sector Activities*.
- 98. **Procurement Guidelines**: Collectively, World Bank Guidelines for the Procurement of Goods, Works and Non-Consulting Services under IBRD Loans and IDA Credits and Grants by World Bank Borrowers, and World Bank Guidelines for the Selection and Employment of Consultants under IBRD Loans and IDA Credits and Grants by World Bank Borrowers.
- 99. **Procurement Plan**: The Borrower's procurement plan prepared in accordance with the Procurement Guidelines or the Procurement Regulations for Borrowers, as applicable.
- 100. **Procurement Regulations for Borrowers**: World Bank Procurement Regulations for IPF Borrowers.
- 101. **Program Information Document**: document prepared for each Bank program for results financing or for DPF under preparation that provides a brief factual summary of the main elements of the evolving program and also includes information and the environmental and social issues related to the program.
- 102. **Project Agreement**: an agreement between the Bank and a project implementing entity relating to the implementation of all or part of a project.

- 103. Project Information Document or PID: document prepared for each Bank investment project financing operation, including Bank guarantee operations under preparation that provides a brief factual summary of the main elements of the evolving project, denotes the Bank lending or guarantee instrument used, and provides a tentative or final financing plan.
- 104. **Reimbursable Advisory Services**: reimbursable advisory services (formerly referred to as "fee-based services") provided by the Bank as a direct response to requests from, and partly or fully paid for by, the recipient ("client") of the service.
- 105. **Requests for Expressions of Interest** or **REoI**: as described in the Procurement Guidelines or the Procurement Regulations for Borrowers, as applicable.
- 106. **Resettlement Plan**: as the term is defined in OP/BP 4.12, Involuntary Resettlement.
- 107. **Resettlement Policy Framework**: as the term is defined in OP/BP 4.12, *Involuntary Resettlement*.
- 108. **Resettlement Process Framework**: as the term is defined in OP/BP 4.12, *Involuntary Resettlement*.
- 109. **Restructuring Paper**: documentation prepared for restructurings pursuant to OP/BP 10.00, *Investment Project Financing*.
- 110. **SECPO**: the policy and operations unit of SEC.
- 111. **Simultaneous Disclosure**: the posting of certain Board Papers before the Board discussion, as provided in section III.B.3 (b) of the Policy.
- 112. Single Audit: term adopted by World Bank Group management to refer to the annual assessment of the specific control objectives relevant to the effectiveness of internal controls over financial reporting of trust fund activities suing the modified cash basis of accounting, excluding large financial intermediary funds, for which the Bank provides separate annual audited financial statements. The enhanced Single Audit integrates management's assertions on the effectiveness of internal controls over the preparation of trust fund financial reports with a new combined financial statement.
- 113. Social Assessment: as the term is defined in OP/BP 4.10, Indigenous Peoples.
- 114. **Specific Procurement Notice or SPN**: as described in the Procurement Guidelines or the Procurement Regulations for Borrowers, as applicable.
- 115. Staff Retirement Plan or Plan: the staff retirement plan of the World Bank Group.
- 116. Statements Submitted to the Development Committee: previously referred to as the "Record of Discussion of the Meeting of the Development Committee", the statements are a document which contains, inter alia, the following information: Note on the Meeting, Note by the President of the World Bank, Statement by the Managing Director of the International Monetary Fund, Prepared Statements

- Submitted by Members, Prepared Statements Submitted by Observers, Agenda, Communique, and List of Participants.
- 117. **Summary Proceedings of Annual Meetings**: an annual publication that contains, *inter alia*, information relating to the annual meetings, including decisions, reports and speeches.
- 118. **Supplemental Financing**: as the term is defined in OP 8.60, *Developmental Policy Financing*.
- 119. **Systematic Country Diagnostic**: as the term is defined in the *World Bank Group Directive: Country Partnership Framework*, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
- 120. **TA**: technical assistance given under non-lending operations.
- 121. **TRD**: Tranche Release Document, as the term is defined in the Policy.
- 122. Trust Funds: as the term is referred to in the Bank Policy: Trust Funds.
- 123. *Trust Fund Program*: a trust fund program administered by the Bank.
- 124. *Trust Fund Program Call for Proposals*: call for proposals to receive financing under a trust fund program administered by the Bank.
- 125. TTL: task team leader.
- 126. **UNDB**: United Nations Development Business, as the term is defined in this *Directive*.
- 127. *United Nations Development Business* or *UNDB*: the official United Nations website for consulting, contracting and export opportunities worldwide.
- 128. *United States Security and Exchange Commission*: the United States agency that oversees key securities participants, concerning disclosure of market-related information, fair dealing, and protection against fraud.
- 129. **VP**: vice president of the Bank.
- 130. **World Bank Group Trust Funds Annual Report**: the World Bank Group's annual report regarding the trust funds that it administers.

# **SECTION III - SCOPE**

The procedures to implement the Bank Policy: Access to Information with respect to (a) routinely available documents, and (b) public availability of certain "financial" and "administrative" documents are set forth below.

# A. Routinely Available Documents

A.	Operational Documents		
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# A. OPERATIONAL DOCUMENTS

A-1: Country Engagement and Related Information			
Information Category	Disclosure Timing and Procedures	Related Processes	
a. Country Engagement Docume	nts		
Systematic Country Diagnostics  Country Partnership Frameworks (CPFs) (formerly, Country Assistance Strategies (CASs))  Performance and Learning Reviews (formerly, CAS Progress Reports (CASPRs))  Country Engagement Notes (formerly, Interim Strategy Notes (ISNs))  - All referred to as Country Engagement documents	Disclosed in accordance with World Bank Group Procedure: Country Engagement.		

Information Category	Disclosure Timing and Procedures	Related Processes			
b. Country Financing Parameters	b. Country Financing Parameters				
Country Financing Parameters	Country Financing Parameters (CFPs), including the analysis underpinning them, may be disclosed in one of two ways: as part of the CPF/CAS (see box above) or as a self-standing note that is prepared outside the CPF/CAS cycle.  If prepared as part of the CPF/CAS, the procedures for CPFs/CASs (as referenced above) are followed. Self-standing CFP notes are disclosed after distribution to the EDs for information.  • The originating unit transmits the document(s) to SECPO, indicating in the Board eSubmission form that it is to be disclosed after distribution to the EDs.  • SECPO distributes the documents to the EDs and notifies IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.	The country director consults the country concerned if s/he believes that the CFP contains confidential country information. The task team, as it considers appropriate, makes adjustments to the document(s) to address the matters of concern to the country.  Classification. When the originating unit transmits the paper to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification when SECPO notifies IDU to disclose the paper.			

Information Category	Disclosure Timing and Procedures	Related Processes
c. Joint Staff Advisory Notes (J	SANs)	
Joint Staff Advisory Notes (JSANs) on Poverty Reduction Strategy Paper (PRSP)	JSANs are made publicly available after discussion by both the Bank's Board and the IMF's Board.  • The originating unit transmits the JSAN to SECPO, together with a copy of the PRSP, indicating in the Board eSubmission form that the JSAN is to be disclosed at the end of the Bank and IMF Boards' discussions.  • The TTL indicates when the IMF discussion will take place in the Board eSubmission form (in the "comment" field). If the date of the IMF Board discussion is after the Bank Board discussion date, the TTL confirms with SECPO when the IMF discussion is completed.  • After the JSAN has been discussed by both Boards, if no revision is needed, SECPO notifies IDU immediately following the Board meeting that the JSAN should be disclosed. IDU then changes the classification and posts it on the Bank's external website.  • If the JSAN is revised, the originating unit coordinates with the IMF to ensure that the final JSAN is distributed to both the Bank and the IMF Boards before it is publicly disclosed. It sends the final text to SECPO by the agreed date, indicating in the Board eSubmission form that it is being circulated in parallel to the IMF Board and is to be disclosed. SECPO distributes the final JSAN to EDs and notifies IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website. Because the IMF's Transparency Policy for country documents is "voluntary but presumed" on a non-objection basis, if the country authorities object to a (joint) document being disclosed by the IMF, then the Bank is not be able to disclose it.	Early during the preparation of a JSAN, the Country Director informs the country in writing that: (a) it is the Bank's policy to make all JSANs available to the public, subject to the IMF's disclosure policy given that JSANs are joint documents; and (b) the Bank shares the draft JSAN with the country authorities before it is distributed to the Board so that the country authorities have an opportunity to identify whether it contains any confidential information relating to the country.  Before the JSAN is distributed to the Board, the TTL requests the country authorities to identify whether it contains any confidential information relating to the country. The Bank, as it considers appropriate, makes adjustments to the JSAN to address the matters of concern to the country before transmitting it to SECPO.  Classification. When the originating unit transmits a JSAN to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU to disclose the JSAN.

Information Category	Disclosure Timing and Procedures	Related Processes
d. HIPC		
Heavily Indebted Poor Country (HIPC) Initiative  • HIPC preliminary decision point • HIPC decision point • HIPC completion point	HIPC documents are prepared jointly by the Bank and the IMF and are made publicly available after they have been discussed by:  (a) the Executive Directors of the Bank; and (b) the Executive Directors of the IMF.  • the TTL transmits the document to SECPO, indicating in the Board eSubmission form that it will be made publicly available after it has been discussed by the EDs of the Bank and the EDs of the IMF.  • After discussion by both Boards, if no revision is needed, SECPO notifies IDU that the document is publicly available. The TTL indicates when the IMF discussion will take place in the Board eSubmission form (in the "comments" field). If the date of the IMF discussion is after the Bank Board date, the TTL confirms with SECPO that the IMF discussion has taken place before disclosure can be made.  • If the HIPC document is revised after the two Board discussions, the originating unit sends the final text to SECPO by the agreed date, indicating in the Board eSubmission form that it is to be disclosed. SECPO distributes the final HIPC document to EDs and notifies IDU that it should be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.	Before finalizing the document, the task team requests the country concerned to identify any text or data that is confidential. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the country before distributing it to Eds.  A MOP accompanying the HIPC document is not made publicly available¹ and is classified by the business unit in accordance with the Information Classification and Control Directive.

<sup>&</sup>lt;sup>1</sup> Until eligible for declassification and disclosure pursuant to section III.B.5(b)iii of the Policy.

e. IDA Country Information  1. IDA Resource Allocation Index (IRAI)	Beginning in 2005, the Bank discloses for all IDA-eligible countries, including blend countries: (i) the scores for the 16 CPIA criteria; (ii) the cluster averages; and (iii) the overall score (IRAI).  The IRAI is released annually at the completion of the CPIA exercise, usually by June. The IRAI ratings are available on the IDA website.	Two elements of the CPIA for IDA-eligible countries are not disclosed and remain restricted: (i) the write-ups that provide the rationale for the ratings, and (ii) the sub-ratings that help determine the scores of some of the criteria.  CPIA scores for IBRD countries, as well as write-ups that provide the rationale for the ratings are not disclosed.		
Country Performance Ratings (CPR)	The CPRs are released annually and are available on the IDA website.	provide the rationale for the ratings are not disposed.		
f. Debt Sustainability Analysis	f. Debt Sustainability Analysis			
Debt Sustainability Analysis (DSA)	IDA-only DSAs are prepared jointly by the Bank and the IMF and are made publicly available after they have been discussed by:  (a) the EDs of the Bank; and (b) the EDs of the IMF.  • the TTL transmits the document to SECPO, indicating in the Board	Before finalizing the document, the country concerned is requested to identify any text or data that is confidential. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the country before distributing it to EDs.		
	<ul> <li>eSubmission form that it will be made publicly available after it has been discussed by the EDs of the Bank and the EDs of the IMF.</li> <li>The TTL indicates when the IMF discussion will take place in the Board eSubmission form (in the "comment" field). If the date of the IMF Board discussion is after the Bank Board discussion date, the TTL confirms with SECPO when the IMF discussion is completed.</li> <li>After discussion by both Boards, SECPO notifies IDU to make the document made available to the public.</li> </ul>			

A-2: Policies and Strategies			
Information Category	Disclosure Timing and Procedures	Related Processes	
a. Operational Policy Papers			
Operational Policy Papers	Operational policy papers are made publicly available through one of three scenarios, depending on whether the papers were prepared following public consultations and whether the EDs have seen an earlier draft.	A MOP accompanying the operational policy paper is not made publicly available <sup>2</sup> and is classified by the business unit in accordance with the Information Classification and Control Directive.	
	Scenario 1: Simultaneous Disclosure (for papers that were prepared following a public consultation process and a draft of which has been seen by the EDs.		
	<ul> <li>The originating unit includes the following language on the front cover of papers that are simultaneously disclosed:</li> </ul>		
	This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available in accordance with the Bank's Policy: Access to Information.		
	ii. Following a Board Committee discussion, the <b>originating unit</b> transmits the paper to SECPO indicating in the Board eSubmission form that it is to be disclosed upon its distribution to the Board.		
	SECPO distributes the paper to EDs and notifies IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.		
	<ul> <li>Following the Board discussion, the originating unit finalizes the paper and sends the final text to SECPO. SECPO includes a stamp on the front cover over the language on Simultaneous Disclosure to indicate "Final Text." SECPO distributes the final version of the paper to the EDs and informs IDU that it should now be disclosed.</li> </ul>		

MOPs are eligible for declassification and disclosure after 20 years, unless they contain information which is not eligible for declassification, as indicated in section III.B.5(b)iii of the Policy.

Information Category	Disclosure Timing and Procedures	Related Processes
Operational Policy papers	Scenario 2: Simultaneous Disclosure (for papers that are prepared following a public consultation process, but the EDs did not review a draft version of the paper). The Board needs to approve early disclosure.	
	If the operational policy paper was prepared following a public consultation process but the EDs did not review a draft version of the paper (i.e., was not discussed by a Board committee), the document <i>may</i> be made publicly available at least two weeks before the Board discussion, <i>if</i> the Board consents to such early disclosure.	
	The originating unit transmits the paper to SECPO at least 20 business days before the Board discussion indicating on the Board eSubmission form that the paper is to be disclosed at least 10 business days before the Board discussion, if the Board approves such early disclosure. The originating unit marks the document on the front page to indicate that it is still to be discussed by the Board (see language under "related processes" column).	
	The Memorandum of the President (MOP) and the Corporate Secretariat memorandum that accompany the Board paper include a paragraph seeking Board approval, on an absence of objection basis, to disclose the operational policy paper ten business days before the Board discussion. The closing date is five working days after distribution to the EDs.	
	After the closing date, if the Board has approved such early disclosure, <b>SECPO</b> notifies IDU that the paper should be disclosed. <b>IDU</b> then changes the classification to "Public" and posts it on the external website.	
	<ul> <li>Following the Board discussion, the originating unit finalizes the paper and sends the final text to SECPO. SECPO includes a stamp on the front cover over the language on Simultaneous Disclosure to indicate "Final Text." SECPO distributes the final version of the paper to EDs and informs IDU that it should be disclosed.</li> </ul>	

Information Category	Disclosure Timing and Procedures	Related Processes
Operational Policy papers	Scenario 3: Disclosed After Board Deliberation	
	If the paper was not prepared following a public consultation process or if the Board does not approve early disclosure, in those cases when such approval is required (scenario 2), it is made publicly available at the end of the Board's deliberative process.	
	<ul> <li>Following the Board discussion, the originating unit finalizes the paper and sends the final text to SECPO. SECPO distributes the final version of the paper to EDs and informs IDU that it should be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	
b. Operational Policies (OPs) and	d Bank Procedures (BPs)	
OPs/BPs	OPs/BPs are publicly available after issuance to staff, including updates (as part of the Operational Manual).	
c. Sector Strategy Papers and O	ther Sector Papers	
i. Sector Strategy Paper		
Sector Strategy Paper –     concept note (including     consultation plan for a new     Sector Strategy Paper (SSP)	Sector Strategy Paper concept notes are made publicly available after they are discussed by CODE.  • The originating unit transmits the documents to SECPO indicating in the Board eSubmission form that they are to be disclosed after CODE discussion.  • After the CODE discussion, the originating unit finalizes the concept note and SECPO distributes the final documents to the EDs and notifies IDU that it should be disclosed. IDU then changes the classification to 'Public' and posts	During external consultations, the <b>task team</b> shares the concept note with institutions, stakeholders and individuals outside the Bank in order to outline the new direction of the SSP and obtain their comments. <sup>3</sup>
	it on the Bank's external website.	

<sup>&</sup>lt;sup>3</sup> For full details on the processing of sector strategies, including external consultations and discussions with CODE, please see <u>"Preparing a New Sector Strategy: Guidance Note."</u>

Information Category	Disclosure Timing and Procedures	Related Processes
2. Sector Strategy Paper	SSPs are subject to the Simultaneous Disclosure provision of the Policy if they have had public consultations <i>and</i> the Board has reviewed them before (i.e., CODE discussion).	Before circulating the SSP to the Board, the <b>task team</b> carries out external consultations based on the concept note.
	iii. The <b>originating unit</b> includes the following language on the front cover of SSPs that are <b>simultaneously disclosed</b> :  This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available in accordance with the Bank's Policy: Access to Information.	Classification. When the originating unit transmits a SSP to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU to disclose the SSP.
	<ul> <li>Following a CODE discussion, the originating unit transmits the SSP to SECPO indicating in the Board eSubmission form that the SSP is to be disclosed upon its distribution to the Board. SECPO distributes the SSP to EDs and notifies IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> <li>Following the Board discussion, the originating unit finalizes the SSP and sends the final text to SECPO. SECPO included a stamp on the front cover over the language on to indicate "Final Text." SECPO distributes</li> </ul>	
	the final version of the paper to EDs and informs <b>IDU</b> to disclose.	
Mid-cycle Implementation     Progress Reports (MCIPR)     Concept Note	<ul> <li>MCIPR Concept Notes are made publicly available after virtual consideration by CODE.</li> <li>The originating unit transmits the MCIPR Concept Note to SECPO indicating in the Board eSubmission form that it is to be disclosed after the closing date for CODE consideration.</li> <li>After the closing date, the originating unit revises the Concept Note (if necessary) and SECPO distributes it to the EDs and notifies IDU to disclose the document. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	

Information Category	Disclosure Timing and Procedures	Related Processes
Mid-cycle Implementation     Progress Reports (MCIPR)	MCIPR is discussed by CODE, after which it is distributed to the Board for information.	
	<ul> <li>Following a CODE discussion, the originating unit transmits the final MCIPR to SECPO indicating in the Board eSubmission form that it is to be disclosed upon its distribution to the Board. SECPO distributes the MCIPR to EDs and notifies IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	
ii. Other Sector Papers		
Other sector papers	Other sector papers are made publicly available through one of three scenarios, depending on whether there have been public consultations and whether the EDs have seen an earlier draft.	
	Scenario 1: Simultaneous Disclosure (for papers that have had public consultations and have been discussed by CODE (or CODE subcommittees) or other Board Committees).	
	See steps for SSP above.	
	Scenario 2: Simultaneous Disclosure (for papers whose preparation did not follow public consultations but have not been discussed by CODE (or CODE sub-committee) or another Board Committee. The Board needs to approve early disclosure.	
	If the sector paper was prepared following public consultations but has not been discussed by CODE, the document <i>may</i> be made publicly available at least two weeks before the Board discussion, if the Board consents to such early disclosure.	
	The <b>originating unit</b> transmits the sector paper to SECPO at least 20 business days before the Board discussion indicating on the Board eSubmission form that the sector paper is to be disclosed at least 10 business days before the Board discussion, if the Board approves such early disclosure. The <b>originating unit</b> marks the document to indicate that it is still to be discussed by the Board (see language in scenario 1 above).	

Information Category	Disclosure Timing and Procedures	Related Processes
Other sector papers (continued)	The SECPO's cover includes a paragraph seeking Board approval, on an absence of objection basis, to disclose the paper 10 business days before the Board discussion. The closing date is five working days after the date of distribution to the EDs.	
	After the closing date, if the Board approves such early disclosure, SECPO notifies IDU to disclose the Sector Paper. IDU then changes the classification to "Public" and posts it on the external website.	
	<ul> <li>Following the Board discussion, the originating unit finalizes the sector paper and sends the final text to SECPO. SECPO includes a stamp on the front cover over the language on Simultaneous Disclosure to indicate "Final Text". SECPO distributes the final version of the paper to EDs and informs IDU that it should now be disclosed.</li> </ul>	
	Scenario 3: Disclosed After Board Deliberation	
	If the sector paper has not had public consultations or if the Board does not approve early disclosure in those cases where such approval is required (scenario 2) it is made publicly available at the end of the Board deliberative process.	
	The <b>originating unit</b> transmits the sector paper to SECPO, indicating in the Board eSubmission form that the paper is to be disclosed at the end of the Board deliberative process.	
	<ul> <li>Following the Board discussion, the originating unit finalizes the Sector Paper and sends the final text to SECPO. SECPO distributes the final version of the Sector Paper to EDs and informs IDU that it should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	

A-3: Advisory Services and Analytics (ASA)		
Information Category	Disclosure Timing and Procedures	Related Processes
a. ASA deliverables		
ASA deliverable documents	ASA deliverables are made publicly available at the completion of the activity:  • Upon approval of the Activity Completion Summary, the Operations Workspace transmits the deliverable document to IDU.  • IDU posts documents classified as "Public After Approval" on the Bank's external website.  In addition, ASA deliverable documents are also made publicly available in the following cases:  • documents of deliverables that are approved by a Decision Review and then completed, before the ASA is completed – with the manager's approval;  • deliverable documents that are not made publicly available at the activity completion – with the decider's approval;  • updated versions of the deliverable documents that have been previously made publicly available – with the manager's approval.	While planning ASA deliverables in the Operations Workspace, the TTL identifies those that will include final documents to be publicly disclosed.  At the completion of such an ASA deliverable, the documents are shared with the client(s) (if any) for final feedback. The decider for the activity informs the client in writing that: (a) it is the Bank's policy to make ASA deliverable documents available to the public; and (b) the Bank shares the draft documents with the client so that it has an opportunity to identify whether the documents contain any confidential information relating to the client.  The Bank, as it considers appropriate, adjusts the documents to address the matters of concern to the client.  Before changing the status of a deliverable to "Completed," the TTL uploads all deliverable documents to the Operations Workspace and assigns a security classification in accordance with the Information Classification and Control Directive.  Documents prepared by the Bank for Reimbursable Advisory Services. The Bank makes such documents (including related legal agreements) available to the public only after the client concerned has granted its written consent to disclose

Information Category	Disclosure Timing and Procedures	Related Processes
b. Research		
Research and Publications	Research by DEC, global practices and regions is routinely posted on the Bank's external web: <a href="http://econ.worldbank.org">http://econ.worldbank.org</a> .	Prior to making research publicly available, the TTL/researcher consults the concerned country director to determine whether the document contains confidential information relating to the country, or information whose disclosure may adversely affect relations between the Bank and the country. The Bank, as it considers appropriate, makes adjustments to the document to address the matters of concern to the country prior to the information being made publicly available. <sup>4</sup> All DEC flagship and formal reports, and all policy research working papers are stored in ImageBank.  A biannual publications catalog is printed in January and July and is disseminated electronically.

External publications conform to the publishing policy and guidelines of the relevant publisher or journal. Internal publication guidelines and instructions for authors:

Office of the Publisher and Info for Authors. Published research can be viewed, downloaded, and/or printed and downloaded free of charge from Documents and Reports.

Information Category	Disclosure Timing and Procedures	Related Processes
c. Data		
Development data and indicators	Disclosed:  The Bank makes publicly accessible databases and derivative products available to the public through the World Bank's website and through <a href="http://data.worldbank.org">http://data.worldbank.org</a> .	The list of disclosed databases is managed through a data catalog presented at <a href="http://data.worldbank.org/data-catalog">http://data.worldbank.org/data-catalog</a> DECDG coordinates and maintains the data catalogue and databank. <b>Owners</b> of new databases contact the director, DECDG, to arrange for their database to be made accessible. <sup>6</sup>
	Timing:  Databases are updated at regular intervals that are specific to each database. The date of updates is provided on the website.  Formats:	<b>Exceptions</b> : Databases containing raw data from data providers or survey respondents are not disclosed if confidentiality of responses and/or anonymity of respondents has been agreed. Some databases are not disclosed if the World Bank does not have authorization from the owners of those databases to do so (i.e., information at issue constitutes information provided in confidence). <sup>7</sup>
	<ul> <li>(a) Electronic: Data in databases can be accessed through query tools and through common download formats through the Bank's website and in some cases on other electronic media. Electronic versions of tables and reports derived from data in databases are also available.</li> <li>(b) Printed publications: Publications based on data in databases are available in printed form.<sup>5</sup></li> </ul>	
d. Impact Evaluation Reports		
Impact Evaluation Reports (For databases underlying the analysis of Impact Evaluation Reports, please see Data section above)	<ul> <li>The TTL transmits the report to IDU, indicating in the IDU submission form that the report is to be disclosed.</li> <li>IDU posts the report on the Bank's external website.</li> </ul>	

Documents covered include the World Development Indicators, Global Development Finance, the Atlas of Global Development, and thematic "Little Data Books."

The purpose of which is, to ensure that new databases: conform with terms of use for data; have clear ownership for maintenance purposes and answering technical and user questions; has agreed updating schedules; and have known data structure (i.e., data and meta data accessible through the system)

Databases that would be excluded from disclosure may include those with individual responses from household or business surveys and enquiries, certain data on loans submitted by countries.

Information Category	Disclosure Timing and Procedures	Related Processes
e. External Training		
Learning materials and related information	Learning materials (e.g., thematic papers and teaching notes, case studies, learning modules, databases, instructional games) are made available for public access and/or in print format.	Case studies may contain potentially sensitive information. Prior to making the information publicly available, the appropriate Bank staff reviews the documents to ensure that they do not contain information that would fall under the Policy exceptions.  Classification. If the documents are still considered deliberative or contain information that would fall under one of the exceptions of the Al Policy, they are classified by the originating unit according to the Information Classification and Control Directive. When the document is ready for disclosure the originating unit changes the classification to "Public" and posts it to the external website.
Development Marketplace     and innovation fairs and     competitions	Proposals and submissions to Development Marketplace and other innovation fairs and competitions by social entrepreneurs and other innovators are made publicly available, unless the information falls under the Policy exceptions (e.g., information given by third parties in confidence).	

	A-4: Lending Information	
Information Category	Disclosure Timing and Procedures	Related Processes
a. Investment Project Financing	(in the form of Loans)	
Project Information Document (PID)	PIDs are disclosed in accordance with BP 10.00, Investment Project Financing, and Instructions: Preparation of Investment Project Financing.	
2. Factual Technical Documents	Three categories of Factual Technical Documents:  (a) Documents prepared by the Borrower: For borrower owned information that, to the Bank's knowledge, has not been made public by the borrower, the TTL seeks the borrower's approval before disclosing. Management (practice manager and country director) determines in accordance with the Policy which part(s) of the document, if not the entire document, is/are to be released.  (b) Documents prepared by the Bank: Before disclosing, the TTL seeks approval from management (practice manager and country director) to ensure that the document does not contain confidential or deliberative information relating to the country. Management determines, in accordance with the Policy, which part(s) of the document, if not the entire document, is/are to be released.  I Documents prepared jointly by the Bank and Borrower: Before disclosing the TTL consults the country concerned to ensure that the document does not contain any confidential information relating to the country. Management determines, in accordance with the Policy, which part(s) of the document, if not the entire document, may be released.  Once approved for disclosure, the TTL sends the document to IDU classifying it as "Public." IDU then posts it on the Bank's external website.	

Information Category	Disclosure Timing and Procedures	Related Processes
Project Appraisal Document (PAD)  [Note: Project papers follow the same process]	PADs are disclosed in accordance with <i>Instructions</i> : Preparation of Investment Project Financing.  [Note: If the borrower provides its written consent to Simultaneous Disclosure, the originating unit includes the following language on the front cover:  This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available in accordance with the Bank's Policy: Access to Information.  Following the Board's consideration, SECPO includes a stamp on the front cover of the PAD, over the Simultaneous Disclosure language, to indicate "Final Text."]	Classification. When the originating unit transmits the document to SECPO, the originating unit classifies it in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU to disclose the PAD.  The MOP accompanying the PAD is not made publicly available and is classified by the business unit in accordance with the Information Classification and Control Directive.
4. Implementation Status and Results (ISR) Report (disclosable version)	Specific sections of the ISR (including the key decisions recorded in the aide memoire) are disclosed after the ISR is archived (i.e., 10 days after the ISR is approved).  The aide memoire for a specific project are deliberative and restricted unless approved for disclosure (i.e., by the relevant country director and agreement of the borrower). The TTL consults with the country management unit and/or regional guidelines for the country/region concerned. If the TTL is given approval to disclose the aide memoire, it is disclosed as an attachment to the ISR via the Operations Workspace.	Upon approval of the ISR, notification is sent to the country director and practice manager (or those they designate to review this) alerting them that within 10 days, the disclosable version of the ISR is sent automatically through the Operations Workspace to IDU and posted on the Bank's external website, unless action is taken by either the country director or practice manager. During those 10 days, if either the practice manager or country director (or their designated staff) decides that the ISR is not ready for disclosure, s/he may revoke the ISR. After the second approval, there is another 10 days to consider any changes.  Cases in which an ISR is not approved, the system archives the ISR after 20 days. In such cases, the same notification is sent out when the 20 days elapse and the practice manager or country director (or their designated staff) has 10 days to review and if needed revoke and ask for revisions to the ISR.

<sup>&</sup>lt;sup>8</sup> Until eligible for declassification and disclosure pursuant to section III.B.5(b)iii of the Policy.

Information Category	Disclosure Timing and Procedures	Related Processes
5. Restructuring Paper	<ul> <li>Level One restructurings. After approval by EDs under the absence-of-objection procedures, SECPO notifies IDU to disclose the paper. IDU then changes the security classification to "Public" and posts it on the Bank's external website.</li> <li>Level Two restructurings. After approval by the country director concerned (or the regional VP if the restructuring involves an extension of more than two years), the system sends an email to IDU once the restructuring is approved by the country director and IDU posts it on the external website.</li> </ul>	
6. Implementation Completion and Results Report (ICR)	<ul> <li>ICRs are made public upon distribution to the Board.</li> <li>The TTL prepares and transmits the report to SECPO through the Operations Workspace.</li> <li>SECPO distributes the report to the EDs and notifies IDU that it is to be made public. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	Before finalizing the document, the borrower concerned is requested to identify any text or data in the report that is confidential. The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern before making it available to the public.  Classification. As with all Board papers that are routinely disclosed, when the originating unit transmits an ICR to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU that the document should be disclosed.
7. Note on Cancelled Operations (NCO)	NCOs are made publicly available after their distribution to the EDs for information.  Same process as for ICRs (see above).	

b. Program for Results		
Program Information     Document	Program for Results, Program Information Documents are disclosed in accordance with BP 9.00, <i>Program-for-Results Financing</i> and Instructions: Program-for-Results Financing.	
Program Appraisal Document	Refer to disclosure procedures for PADs under Investment Project Financing (in the form of loans).	
3. Restructuring Paper	<ul> <li>Level One restructurings. After approval by EDs under the absence-of-objection procedures, SECPO notifies IDU to disclose the paper. IDU then changes the security classification to "Public" and posts it on the Bank's external website.</li> <li>Level Two restructurings. After approval by the country director concerned, the system sends an email to IDU once the restructuring is approved by the country director and IDU posts it on the external website.</li> </ul>	
4. Program Completion Report	Refer to disclosure procedures for project completion reports under Investment Project Financing (in the form of loans).	

Information Category	Disclosure Timing and Procedures	Related Processes
c. Development Policy Financing	(DPFs) (in the form of loans)	
Program Information Document	DPF Program Information Documents are disclosed in accordance with BP 8.60, Development Policy Lending and Development Policy Financing Processing Instructions.	
2. Program Document (PD)	DPF PDs are disclosed in accordance with BP 8.60, Development Policy Lending.  [Note: if the PD is subject to Simultaneous Disclosure, the originating unit indicates on the front cover:  This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available unless otherwise decided by the Board.  If the PD is subsequently revised to reflect the Board discussion, following receipt of the final PD, SECPO includes a stamp on the front cover, over the language on Simultaneous Disclosure, to indicate "Final Text."]	Before finalizing the document, the borrower concerned is requested to identify (typically at negotiations) any text or data in the report that is confidential. The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern to the borrower before making it available to the public.
3. Letter of Development Policy	Letters of Development Policy are made publicly available with the PD.  LRC makes the LDP publicly available by filing the LDP in WBDocs as "Public."	During negotiations related to the DPF, the country concerned is informed that it is the Bank's policy to make the LDP publicly available.
4. Fund Relations Note	Fund Relations Notes are made publicly available with the PD, unless the Fund has indicated that the country concerned has not consented to disclosure.	If the country has not consented to disclosure, the Fund Relations Note is attached to the MOP for the Board's consideration.
Supplemental Financing document	Supplemental financing documents are made publicly available in the same manner as a PD (see above).	

Information Category	Timing of Disclosure	Related Procedures
6. Tranche Release Document (TRD)	<ul> <li>(a) A TRD is disclosed following distribution to the Board if Bank Management approves the release of a tranche, and the EDs are informed of such approval (see scenario 1 below).</li> <li>(b) If a waiver of tranche release conditions is recommended, the TRD is disclosed after the EDs approve the waiver (see scenario 2 below).</li> <li>Scenario 1: TRD approved by Management (no waiver)</li> <li>The TTL transmits the TRD to SECPO indicating in the Board eSubmission</li> </ul>	Before finalizing the document, the borrower concerned is requested to identify any text or data in the report that is confidential. The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern to the Borrower before making it available to the public.  Classification. When the originating unit transmits a TRD to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU to disclose the TRD.
	form that the TRD is to be disclosed after distribution to the EDs.  SECPO distributes the TRD to EDs and notifies IDU to disclose the TRD. IDU changes the classification to "Public" and posts the TRD on the Bank's external website.	The MOP that accompanies the TRD is not publicly available and may incorporate confidential matters conveyed by management to the EDs.9
	The TTL transmits the waiver request to SECPO indicating in the Board eSubmission form that the final TRD is to be disclosed at the end of the Board deliberative process.  SECPO distributes the TRD to EDs and after approval; SECPO notifies IDU that it is publicly available. IDU changes the security classification to "Public" and posts it on the Bank's external website.	

<sup>&</sup>lt;sup>9</sup> Until eligible for declassification and disclosure pursuant to section III.B.5(b)iii of the Policy.

Information Category	Disclosure Timing and Procedures	Related Processes
7. Implementation Status and Results (ISR) Report (disclosable version)	Specific sections of the ISR (including the key decisions recorded in the aide memoire) are disclosed after the ISR is archived (i.e., 10 days after the ISR is approved).  The aide memoire for a DPF is restricted by the "Deliberative Information" exception and restricted unless approved for disclosure (i.e., by the relevant country director and agreement of the borrower). The TTL consults with the country management unit and/or regional guidelines for the country/region concerned. If the TTL is given approval to disclose the aide memoire, it is disclosed as an attachment to the ISR via the Operations Workspace.	See discussion in this Annex regarding related processes for IPL ISRs.
Implementation Completion and Results Report (ICR)	The TTL prepares and transmits the report to SECPO through the Operations Workspace.     SECPO distributes the report to the EDs and notifies IDU to disclose the report. IDU changes the classification to "Public" and posts it on the Bank's external website.	Before finalizing the document, the borrower concerned is requested to identify any text or data in the report that is confidential. The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern to the borrower before making it available to the public.  Classification. When the originating unit transmits an ICR or NCO to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to "Public" when SECPO notifies IDU to disclose the document.
9. Note on Cancelled Operations (NCO)	See disclosure procedures for ICRs under Investment Project Financing (in the form of loans).	

Information Category	Disclosure Timing and Procedures	Related Processes		
d. Bank guarantees Project-based Bank Guarantees				
Policy-based Bank Guarantees (PBGs)				
Project Information     Document (PID) (i.e., for project-based guarantees)     Program Information     Document (for PBGs)	The PID for project-based guarantees is made publicly available in accordance with BP 10.00, Investment Project Financing, and Instructions: Project-based Guarantees.  The TTL sends the initial PID and its updates directly through the Operations Workspace. The initial PID should be disclosed no later than five business days after the concept review meeting.			
Factual Technical     Documents (for project-based guarantees)	Publicly available after consulting the country concerned and obtaining consent from relevant third parties that may have provided FTDs in confidence to the Bank (project sponsors, contractors, commercial lenders, and other purchasers of debt issued by the sponsors or the government). Management determines, in accordance with the Policy, which part(s) of the document may be made public.	Before disclosing a FTD, the <b>TTL</b> consults the relevant parties that have provided FTDs to the Bank in confidence (e.g., project sponsors, project participants, commercial lenders, and other purchasers of debt issued by the sponsors or the government) to ensure that the document does not contain or refer to any information given in confidence to the Bank. The TTL consults the director concerned if there is any uncertainty regarding the proprietary or otherwise confidential information.		

Information Category	Disclosure Timing and Procedures	Related Processes
Project Appraisal Document (PAD) – for project-based guarantees	PADs/PDs are disclosed in accordance with <i>Instructions: Project-based Guarantees</i> and <i>Development Policy Financing Processing Instructions</i> , and the following:	Before finalizing the document (usually during negotiations related to the guarantee operation), the country concerned is requested to identify any text or data in the draft report that is confidential.
Program Document (PD) – for PBGs	PADs/PDs are subject to Simultaneous Disclosure if the country concerned grants its written consent to such early disclosure (see scenario 1 below). Simultaneous Disclosure is not appropriate in cases in which distribution to the Board takes place before negotiations have been completed.	The <b>task team</b> also consults with the other relevant parties to the operation (e.g., project sponsors, other project participants/ contractors, and commercial lenders and other purchasers of debt) to ensure that the document does not contain or refer to any information given in confidence to the Bank.
	If the country does not consent to Simultaneous Disclosure or negotiations have not been completed prior to Board distribution, the PAD/PD is disclosed at the end of the Board deliberative process (see Scenario 2 below).	The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern to the country <b>or the third parties to the operation</b>
	<b>Note.</b> Board approval does not always signify the end of the Board deliberative process. In the case of Bank guarantee operations, negotiations may be completed after Board approval. If the negotiations result in substantial changes of the terms or conditions of the guarantee, the Region resubmits the operation for Board approval of the changes. The deliberative process ends <b>only</b> after the Board has been informed of the outcome of the negotiations or has approved the changes.	before making it available to the public.  Restricted information is included in the MOP accompanying the PAD/PD. A MOP accompanying the PAD/PD is not made publicly available 10 and is classified in accordance with the Information Classification and Control Directive.
	Scenario 1: PADs subject to Simultaneous Disclosure	Classification. When the originating unit transmits a PAD/PD to SECPO, it is classified in accordance with the Information Classification and Control Directive. When SECPO notifies IDU to disclose the PAD/PD, IDU changes the classification to "Public" and posts it on the Bank's
	<ul> <li>The originating unit includes on the cover of the document the following text:</li> </ul>	external website.
	This document is being made publicly available prior to Board consideration. This does not imply a presumed outcome. This document may be updated following Board consideration and the updated document will be made publicly available unless otherwise decided by the Board.	
	SECPO distributes the PAD/PD to EDs and notifies IDU to disclose the PAD/PD. IDU changes the classification to "Public" and posts the PAD/PD on the Bank's external website.	

Information Category	Disclosure Timing and Procedures	Related Processes
	If the PAD/PD is subsequently revised to reflect the Board discussion, the <b>originating unit</b> sends the final PAD/PD to SECPO by the agreed date, indicating in the Board eSubmission form that it is to be disclosed. <b>SECPO</b> includes a stamp on the front cover over the language on simultaneous disclosure to indicate "Final Text." <b>SECPO</b> distributes the final version of the paper to EDs and informs <b>IDU</b> that it should be disclosed. <b>IDU</b> then changes the classification to "Public" and posts it on the external website.	
	Scenario 2: PADs/PDs not subject to Simultaneous Disclosure	
	The <b>originating unit</b> transmits the PAD/PD to SECPO, indicating in the Board eSubmission form that: (a) the country and other relevant third parties to the operation have not granted their consent to Simultaneous Disclosure and/or negotiations have not been completed; and (b) the final PAD/PD is to be disclosed at the end of the Board deliberative process. (See above Note on the end of the Board deliberative process.)	
	<ul> <li>Upon notification by the originating unit that negotiations have been completed, if the PAD/PD does not need revisions, SECPO notifies IDU following the Board meeting that the PAD/PD should now be disclosed. IDU then changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	
	<ul> <li>If the PAD/PD is revised—following Board discussion, the completion of negotiations, or the Board approval of changes to the terms and conditions of the guaran—ethe originating unit sends the final PAD/PD to SECPO by the agreed date, indicating in the Board eSubmission form that it is to be disclosed. SECPO distributes the final PAD/PD to EDs and notifies IDU that it should now be disclosed. IDU changes the classification to "Public" and posts it on the Bank's external website.</li> </ul>	
Letter of Development Policy (for PBGs)	Letters of Development Policy are prepared by the member country for PBGs. They are disclosed together with the Program Document.	During negotiations related to the PBG operation, the country concerned is informed that it is the Bank's policy to make the LDP publicly available.
5. Fund Relations Note	Funds Relations Notes are publicly available with the PD unless the Fund has indicated that the country concerned has not consented to disclosure.	If the country has not consented to disclosure, the Fund Relations Note is attached to the MOP for the Board's consideration.

Information Category	Disclosure Timing and Procedures	Related Processes
Supplemental Financing     Document	The Supplemental Financing document is made publicly available in the same manner as the PD (see above).	
7. Project Paper (for project- based guarantees)	Disclosed in the same manner as a PAD.	
8. Implementation Status and Results Report (ISR) (publicly available version)	For project-based guarantees, refer to procedures for ISRs under <i>Investment Project Financing</i> (in the form of loans), above.	
	For policy-based guarantees, refer to procedures for ISRs under <i>Development Policy Financing</i> (in the form of DPF loans), above.	
	<b>TTLs</b> obtain the necessary approval of the country director / practice manager prior to disclosure of the public portion of the ISR.	
Implementation Completion and Results Report (ICR)	For project-based guarantees, refer to procedures for ICRs under <i>Investment Project Financing</i> (in the form of loans), above.  For PBGs, refer to procedures for ICRs under <i>Development Policy Financing</i> (in the form of DPF loans), above.	Before making the ICR available to the public, <b>TTLs and their management</b> ensure that the document does not reveal confidential business information. Bank management consults with the relevant third parties of the operation (e.g., project sponsors, commercial lenders, and other purchasers of debt issued by the sponsors or the government) as needed.
		Classification. When the originating unit transmits an ICR or NCO to SECPO, it is classified in accordance with the Information Classification and Control Directive." IDU changes the classification to "Public" when SECPO notifies IDU to disclose the document.
10. Note on Cancelled Operations	NCOs are made publicly available after their distribution to the EDs for information.	
	Same process as for ICRs (see above).	

Information Category	Disclosure Timing and Procedures	Related Processes
e. Legal Documents  1. Legal Agreements related to the Bank's Lending Operations  (a) Loan Agreements (b) Guarantee Agreements (i.e., for guarantees issued by member countries in Bank lending operations)	Scanned copies of the original signed agreements are made publicly available  After the signing of legal agreements, the <b>task team</b> sends to LEG the originals.  LEG staff members verify that the documents are properly signed. Responsible  LEG staff scan the agreements and send the originals to LRC for filing in the  Bank's records management system (WBDocs).  Following receipt of the original signed document, <b>LRC staff</b> files the scanned copy of the original document in WBDocs, classifying it as "Public." Following which the document becomes publicly available on the Bank's external site, Documents and Reports.	Classification: The responsible lawyer receives from the TTL an electronic copy of the effectiveness notice, the responsible LEG staff prepares an effectiveness memo and LRC is notified. LRC staff members file the agreements as "Public" in the Bank's official management repository.  If supplemental letters contain or refer to financial information or other information given in confidence by the borrower (i.e., which would fall under one or more of the exceptions), the supplemental letters are restricted; in these cases, the
(c) IDA Financing Agreements (previously called Development Credit/Grant/Financing Agreements) (d) Project Agreements (e) Supplemental letters to the abovementioned agreements (f) Preparation Advance Agreements (g) Any amendments to the above mentioned agreements		agreements are classified as "Official Use Only," "Confidential" or "Strictly Confidential" in accordance with the Information Classification and Control Directive.

Information Category	Disclosure Timing and Procedures	Related Processes
Legal Agreements related to the Bank's Guarantee Program      (a) Indemnity Agreements     (and any amendments)	Indemnity Agreement. Scanned copies of the signed Indemnity Agreement are made publicly available after the Indemnity Agreement is effective.  When the Indemnity Agreement is declared effective, LRC staff post the scanned signed copy in the Bank's records management system (i.e.,	After the signing of the Indemnity Agreement, the <b>task team</b> sends the originals to LEG. LEG staff verifies that all documents are properly signed. Responsible LEG staff scan the agreements and send the originals to LRC for filing in the Bank's records management system.
thereto)  (b) Guarantee Agreements (for guarantees issued by the Bank in a Bank guarantee operation)  (c) Project Agreements (for project-based guarantees)	Guarantee and Project Agreements. Prior to disclosing a Guarantee or Project Agreement, the TTL, in consultation with LEGSG, obtains the written consent of: (i) the project company, or project sponsors, as appropriate, for Project Agreements; or (ii) the guarantee beneficiaries (lenders) for Guarantee Agreements. Once the agreements are effective and if consent has been given to disclose, LRC staff posts the scanned signed copy of the Guarantee Agreement and Project Agreement in the Bank's records management system and files them as "Public." Absent the relevant party(ies) written consent to disclose, the information is restricted under the Policy's "Information Provided by Member Countries or Third Parties in Confidence" exception.	After the signing of a Guarantee Agreement or Project Agreement, LEG receives the original from the <b>task team</b> and verifies that all documents are properly signed. Responsible LEG staff scans the agreements and send the originals to LIC for filing in the Bank's records management system.  **Classification of Guarantee Agreement and Project Agreement:** Unless a Guarantee or Project Agreement has the consent of the guarantee beneficiaries/lender (for Guarantee Agreements), or the project company /sponsors (for Project Agreements), such documents should be considered restricted information and classified as "Official Use Only," "Confidential" or "Strictly Confidential" in accordance with the Information Classification and Control Directive. If such consent has been given, LRC staff posts the scanned signed copy in the Bank's records management system as "Public."

Information Category	Disclosure Timing and Procedures	Related Processes
f. Portfolio Overview		
Country Portfolio Performance Reviews (CPPRs)	After the CPPR is discussed with country counterparts, it is finalized and made public.  After finalization, the <b>originating unit</b> releases the document to the public on the Bank's external website.  • The <b>TTL</b> transmits the report to IDU, indicating in the IDU Submission Form that it is to be disclosed.  • <b>IDU</b> posts the report on the Bank's external website.	Before finalizing the document, the government concerned is requested to identify any text or data in the report that is confidential. The <b>task team</b> , as it considers appropriate, makes adjustments to the document to address the matters of concern to the country before making it available to the public.  Classification: When transmitting a CPPR to the IDU, the originating unit files it as "Public."
2. Monthly Operational Summary (MOS)	<ul> <li>MOS is made publicly available upon its distribution to the Board.</li> <li>The originating unit prepares and submits MOS information through the Operations Workspace</li> <li>OPCS collates the information, prepares and transmits the MOS report to SECPO indicating in the Board eSubmission form that the MOS is to be disclosed after distribution to the EDs.</li> <li>SECPO distributes the report to the EDs and notifies IDU that it is publicly available. IDU then changes the classification to 'Public" and posts it on the Bank's external website. The report is also posted on the UN Development Business website.</li> </ul>	

Information Category	Disclosure Timing and Procedures	Related Processes
g. Environmental & Social Safegu	uards	
Integrated Safeguards Data Sheets (ISDS)	Disclosed in accordance with, as appropriate: (a) Instructions: Preparation of Investment Project Financing; and (b) Instructions: Implementation Support to Project Completion.	
Safeguard document     prepared by the borrower	The <b>TTL</b> submits safeguard documents <b>prepared by the borrower</b> (including environment reports, resettlement instruments, indigenous peoples' instruments, safeguard diagnostic reviews), which are made public as a condition for Bank financing. <sup>11</sup>	
Environmental Assessment (EA) reports	Disclosed in accordance with OP/BP 4.01, Environmental Assessment.	
4. EA reports for Category A sub- projects  (under financial intermediary operations or sector investment operations)	Disclosed in accordance with OP/BP 4.01, Environmental Assessment.	
5. Environmental and social assessment documents for Category A and Category B Private Sector Activity  (under Bank supported Private Sector Activity for which the World Bank Performance Standards apply in accordance with OP 4.03, Performance Standards for Private Sector Activities.	Disclosed in accordance with OP/BP 4.03, Performance Standards for Private Sector Activities.	

References to policies and procedures related to specific safeguard documents are provided below; see also the <u>safeguard documents submission guidelines</u>.

Information Category	Disclosure Timing and Procedures	Related Processes
6. The elements of a financial intermediary's environmental and social management system, as specified in OP 4.03, Performance Standards for Private Sector Activities, for Category FI-1 and FI-2 Private Sector Activities	Disclosed, as relevant, in accordance with OP/BP 4.03, Performance Standards for Private Sector Activities.	
(under Bank supported Private Sector Activity for which the World Bank Performance Standards apply in accordance with OP/BP 4.03, Performance Standards for Private Sector Activities.		
7. Resettlement Plan Resettlement Policy Framework Resettlement Process Framework	The draft and final documents are disclosed in accordance with OP/BP 4.12, Involuntary Resettlement.	
8. Resettlement Plan for sub-projects under financial intermediary operations that require prior-review by the Bank	Disclosed in accordance with OP/BP 4.12, <i>Involuntary Resettlement</i> :  (a) after each resettlement plan has been approved by the Bank, and  (b) before the sub-project is accepted for Bank financing.	
9. Resettlement Plan  For sub-projects under FI operations that do not require prior-review by the Bank	Disclosed in accordance with OP/BP 4.12, <i>Involuntary Resettlement</i> , after each resettlement plan has been officially received by the Bank.	

Information Category	Disclosure Timing and Procedures	Related Processes
Indigenous Peoples     Plan (IPP) (including for individual programs and subprojects)	Disclosed in accordance with OP/BP 4.10, Indigenous Peoples.	
Indigenous Peoples' Planning Framework (IPPF) (including for individual programs and subprojects)		
11. IPP for sub-projects involving Indigenous Peoples	Disclosed in accordance with OP/BP 4.10, <i>Indigenous Peoples</i> , and with the specific disclosure requirements set out in the IPPF for the project.	
12. Social Assessment (for projects involving Indigenous Peoples)	Disclosed in accordance with OP/BP 4.10, Indigenous Peoples.	
Social Assessment     (for sub-projects involving indigenous people)	Disclosed in accordance with OP/BP 4.10, Indigenous Peoples.	
13. Environmental Action Plan	Disclosed in accordance with OP/BP 4.02, Environmental Action Plan.	

Information Category	Disclosure Timing and Procedures	Related Processes
h. Financial Management		
Audited Financial Statement	Audited Financial Statements (or in exceptional cases, an abridged version) for investment operations for which the invitation to negotiate is issued on or after July 1, 2010, are made available to the public as a condition financing.  The audited financial statements are made publicly available after the country has officially provided them to the Bank.  The documents are made publicly available by the Bank by:  Submitting through IDU: The receiving unit classifies the audited financial statements as 'Public' and submits them to the IDU. IDU posts public documents on the Bank's external website.	In some exceptional cases, i.e. when the audited financial statements contain proprietary or commercially sensitive information, the borrower or designated project entity may be exempted from disclosing the full set of the annual audited financial statements but is still be required to disclose an abridged version of them. If such exception is approved by the Bank, when transmitting the audited financial statements to the bank, the borrower or designated project entity: (a) communicates to the Bank not to disclose the full set of financial statements on the grounds that they contain proprietary or commercially sensitive information; (b) classifies the financial statements accordingly; and (c) provides an abridged version of the financial statements (including the auditors' opinion thereon) that the Bank would then disclose. The justification for application of this exceptional provision is discussed during project preparation.  The receiving unit consults with the designated financial management staff before filing audited financial statements to ensure that other (non-public) information that may be submitted by the borrower along with the financial statements is classified accordingly.

Information Category	Disclosure Timing and Procedures	Related Processes
i. Procurement Information for Ba	ank-financed Operations <sup>12</sup>	
I. Procurement Framework	A framework consisting of the Bank Procurement Policy, Directive, Procedure, and Guidance (Procurement in IPF and Other Procurement Operational Matters); the Procurement Guideline and the Procurement Regulations for Borrowers, standard procurement documents and other procurement documents issued by the Board or Management and classified as public. The Chief Procurement Officer, OPCS, publishes these documents on the World Bank external website.	
II. Borrower's procurement documents provided to the Bank with the understanding that the Bank makes them available to the public.	Procurement documents prepared by the Borrower that are made available to the public by the Borrower as required by the Procurement Guidelines or the Procurement Regulations for Borrowers, as applicable. The Borrower also provides these documents to the Bank with the understanding that the Bank makes them available to the public.	

Procurement Plan and update	The <b>Bank</b> makes procurement plans and updates <sup>13</sup> publicly available on the Bank's external website ( <u>www.worldbank.org</u> ) as follows:	
	<ul> <li>(a) Initial procurement plan – disclosed after the loan/credit negotiations.</li> <li>(b) Annually updated procurement plans throughout the duration of the project – after they are officially received and approved by the Bank – made publicly available by the Bank through the Bank's external website.</li> </ul>	

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Information Category	Disclosure Timing and Procedures	Related Processes
2. General Procurement Notice (GPNs)	The Bank arranges for the publication of the GPN in UN Development Business online (UNDB Online) and on the World Bank's external website.	
3. Specific Procurement Notices) (SPNs)	The <b>Borrower</b> discloses notices for international competitive bidding, and national competitive bidding, in accordance with the requirements of the Procurement Guidelines or the Procurement Regulations for Borrowers, as applicable.  For open international competitive procurement (a) the Borrower shall also publish the SPN in UNDB online and, if possible, in an international newspaper of wide circulation; and (b) the Bank arranges for the simultaneous publication of the SPN on the World Bank's external website.	

Information Category	Disclosure Timing and Procedures	Related Processes
4. Request for Expressions of Interest (REoI)	REols for consulting services contracts either (i) subject to open international competitive procurement <sup>14</sup> , or (ii) with estimated costs at or above USD300,000 <sup>15</sup> , are published by the Borrower in UNDB online.  The Bank arranges for the simultaneous publication of these REols in the World Bank external website.	
5. Contract award information for:	For all contracts the Borrower publishes a public notice of award of contract (Contract Award Notice) within 10 business days from the Borrower's notification of contract award to the successful bidder/proposer/consultant. The Contract Award Notice is published on the Borrower's website with free access, or, if not available, in at least one newspaper of national circulation in the Borrower's country, or in the official gazette. In the case of international competitive procurement, the Contract Award Notice also is published by the Borrower in UNDB online.  For contracts subject to the Bank's prior review, the Bank arranges the publication of the Contract Award Notice in the World Bank external website upon receipt from the Borrower of a conforming copy of the signed contract.	

<sup>&</sup>lt;sup>14</sup> Ref: Procurement Regulations for Borrowers.

<sup>&</sup>lt;sup>15</sup> Ref: Procurement Guidelines.

# A-5. Trust Funds and Partnerships

## a. General

Information Category	Timing of Disclosure and Process	Related Processes
Trust Fund Program Call for Proposals	<ul> <li>Calls for Proposals for trust fund programs open to external application are publicly available.</li> <li>Trust fund program managers and/or secretariats provide call for proposals advertisements and documentation in a manner and location allowing public access and open application.</li> <li>Call for Proposals that are open to external application are also posted to the trust fund program's external website and/or the Bank's external website.</li> </ul>	IDA/IBRD administered trust fund programs and World Bank hosted program secretariats file documents related to Call for Proposals in the Bank's records management system as "Public" under the associated trust fund identification number.
Grant Reporting and Monitoring (GRM) for Bank-executed trust funds	Trust fund program managers may decide to make a public version of the GRMs publicly available upon final approval.	GRMs are automatically stored in the Bank's records management system against the GRM identification number.
3. Progress Reports (ISRs) and Completion Reports (ICRs) for recipient-executed trust funds	A public version of ISRs is made publicly available upon final approval ICRs are publicly disclosed upon approval	ISRs and ICRs are automatically stored in the Bank's records management system against the project ID.

Information Category	Disclosure Timing and Procedures	Related Processes
Implementation completion memorandum	The document is publicly available after it has been approved by the TTL's line manager.	In the case of cofinancing trust funds, or other trust funds which only finance an RETF operation, the corresponding ICR is used instead of an ICM, and is disclosed in line with the procedures for ICRs (see entry above for ICRs for Investment Operations).
5. World Bank Group Trust Funds Annual Report	The World Bank Group Trust Funds Annual Report is made publicly available after final approval and printing.	
	DFi posts electronic copies under the 'trust funds' section of the Bank's external website.	
Directory of partnership programs supported by trust funds	A digital directory providing real-time information on programs supported by trust funds and financial intermediary funds	Digital directory is available via http://programs.worldbank.org
7. Aggregate financial information on the amount of contributions made to each trust fund by donor	Made publicly available through <a href="http://data.worldbank.org">http://data.worldbank.org</a> .	Provided that the type of financial information is not in the list of exceptions under the Policy, trust fund financial information may be made publicly available through posting on the Bank's external website.
Aggregate financial information on the amount of commitments and disbursements made from each trust fund to specific activities or countries	Made publicly available through http://data.worldbank.org .	Provided that the type of financial information is not in the list of exceptions under the Policy, trust fund financial information may be made publicly available through posting on the Bank's external website.

Information Category	Disclosure Timing and Procedures	Related Processes
Single audit with combined financial statements	Disclosed:	Published on the World Bank's external website: https://financesapp.worldbank.org/en/summaryinfo/overview/
	<ul> <li>Upon completion of the single audit (i.e. no interim copies to be distributed)</li> <li>Upon approval of the single audit by the Bank's Audit Committee. Note that there may be a time lag between when the single audit is completed and when the Audit Committee approves the single audit.</li> </ul>	
b. Trust Funds, Externally Funded	Outputs, Ancillary & Related Legal Agreements	
Trust fund agreements, externally funded outputs, and other related documents and agreements	Scanned copies of the original signed agreement are made publicly available after the agreement is fully signed by all parties concerned.	After the signing of trust fund agreements (i.e., framework Agreements, Administration Agreements, Donor Balance Account Agreements, Holding Account Agreements, Transfer Agreements and Financial Procedures Agreements) and the
(a) Framework agreements	Once the agreement is fully signed by all parties, <b>LRC</b> staff (with respect to trust	related amendments, LEG receives the electronically signed agreements or the originals from the <b>task team</b> and verifies that
(b) Administration agreements (also referred to as contribution or participation	fund agreements) or TTLs (with respect to externally funded outputs, miscellaneous reimbursable agreements, ancillary agreements and activity agreements), post the scanned countersigned copy of the agreement in the	all documents were properly signed and is filed in WB docs.  After the signing of externally funded output agreements,
agreements)	Bank's records management system as "Public."	miscellaneous reimbursable agreements, ancillary agreements, activity agreements, and any related
(c) Donor balance account agreements		amendments, <b>TTLs</b> scan the original signed agreements (filing the scanned copies in the Bank's records management system and categorizing them as "Public." Prior to posting
(d) Holding account agreements		the agreements as "Public," TTLs review any attachments
(e) Transfer agreements		or annexes to such agreements to ensure that they do not contain information that would fall under the exceptions in the
(f) Financial procedures agreements		Policy. Any attachments or annexes that contain information that should be restricted under the Policy is classified as "Official Use Only," "Confidential" or "Strictly Confidential" in
(g) Externally financed outputs		accordance with the Information Classification and Control
(h) Reimbursable agreements		Directive.
(i) Activity agreements (such as LLI activity agreements)		Classification: Once the agreement is fully signed by all parties concerned the agreements are filed in the Bank's records management system as "Public."
(j) Ancillary agreements		, coordo managament e, com de la casa.
(k) Any amendments to the abovementioned documents or agreements		

Information Category	Disclosure Timing and Procedures	Related Processes
2. Grant / letter agreements	Scanned copies of a signed agreement are made publicly available after the agreement is fully signed by all parties to the agreement.  Once the agreement is fully signed by all parties, LRC files the scanned copy of the agreement in the Bank's records management system (i.e., WBDocs) as "Public."	After the signing of agreements and any related amendments, the <b>task team</b> sends the originals to LEG. LEG verifies that all documents are properly signed. LEG scans the agreements and provides them to LRC for filing in the Bank's records management system.  Classification: Once the agreement is fully signed by all parties, LRC files the agreement in the Bank's records management system as "Public."

Information Category	Disclosure Timing and Procedures	Related Processes
c. Partnership Agreements and	Other Partnership Documents	
Partnership agreements	Partnership agreements (i.e., partnership documents to which the Bank is a signatory) and any related amendments are publicly available upon full execution of the document, provided all signatory parties agree.	Partnership documents that are signed by the Bank are made publicly available through posting on the Bank's external website, unless posted on the partnership's external website.
	Scanned copies of the original signed agreement are made publicly available after the agreement is fully signed by all parties concerned.	Express prior agreement to disclose should be obtained by the other signatory parties through inclusion of a clause to that effect in the signed partnership document (e.g., "The Parties agree that this agreement / document is publicly disclosed [by the Bank].").
		The WB Unit sponsoring or acting as signatory for the Bank should keep track of all partnership documents signed by their managers and make them available for public access on the external website of the WB Unit (or confirm public access on the partnership's website) once signed by all relevant parties with an agreement to disclose.
		After the signing of partnership documents, and any amendments thereto, that include an agreement to disclose, <b>TTLs</b> are responsible for scanning the documents and filing the scanned signed documents in the Bank's records management system as "Public".
		Classification: Once the document is fully signed by all parties thereto, including with agreement to disclose, the document is filed in the Bank's records management system as "Public". Before then, such documents should be classified in accordance with the Information Classification and Control Directive.

Information Category	Disclosure Timing and Procedures	Related Processes
2. Partnership documents without Bank signatures for partnerships with Bank administrative support (e.g., in- house secretariats)	Available for public access provided the partnership agrees.  Such partnership documents would be made available for public access on the external website of the VPU providing the Bank's administrative support or on the partnership's external website, if hosted by the Bank.	For partnerships whose primary administrative support is provided by the Bank (whether a full-fledged in-house secretariat or more modest support unit), the Policy applies to partnership documents – i.e., jointly prepared documents – as it would to regular Bank documents, provided the partnership agrees.  The partner's agreement is sought prior to disclosure, but is expected to be obtained for the Bank to be able to continue to provide administrative support. Such agreement may be obtained by affirmative consent or no objection on the part of the partnership's principal governing body.  All the Policy's exceptions apply, such that each Bank partnership support unit should consider which unsigned
		partnership documents merit routine disclosure (e.g., final minutes of meetings), ad hoc disclosure (certain commission reports) or no disclosure (deliberative documents) and seek partnership agreement on this basis.
3. Partnership documents without Bank signatures for partnerships without Bank administrative support (e.g., external secretariats)	Available for public access to the extent posted by the non-Bank entity providing the partnership's administrative support.  Bank staff members engaging in such partnerships encourage disclosure and access standards comparable to the Bank's Policy as part of the Bank's participation in the partnership.	For partnerships with external secretariats or primary administrative support units based in another organization, or for legal entities in which the Bank participates on a governing body (e.g., as a Board member), the Bank participant encourages those partnerships or entities to align their disclosure policies with the Bank's Policy. If, after consultations by the Bank with the partnership or entity, the partnership or entity remains unwilling to adopt a comparable approach to disclosure and access for its partnership documents, the Bank may re-evaluate its participation in the partnership or entity.

### **B. BANK FINANCIAL INFORMATION**

B-1: Loans and Credits		
Information Category	Disclosure Timing and Procedures	Related Processes
Monthly Loan and Credit     Statements	CTR prepares these documents and submits them to IDU by the 15 <sup>th</sup> of the month.	The statements are generated from SAP/iLAP by CTRCF, reviewed internally, and reconciled with the ledgers.
(a) IBRD Statement of Loans (b) IDA Statement of Development Credits*		Once the review and reconciliation is complete, CTRCF releases the statements from the CTRCF Reports account electronically to the IDU.
* Includes both development credits and development grants.		
	B-2: IBRD Financial Statements	
IBRD's annual audited financial statements	CTR prepares the IBRD's annual audited financial statements, including the accompanying Management Discussion and Analysis (MD&A) as of the June 30 fiscal year-end, notes to the financial statements with all significant accounting policies, and other detailed disclosures.	The statements and MD&A are also made available in a substantially equivalent form within the content of the Information Statement prepared annually.
	After EDs have approved the statements, they are publicly disclosed through three primary vehicles:	
	(a) in the Bank's <i>Annual Report</i> prepared by ECR at the time of the Annual Meetings	
	(b) in the mandated publicly available filing with the United States Securities and Exchange Commission (SEC) 45 days after the end of the reporting period; and,	
	(c) made available by TRE on the Investor Relations page of the Bank's external website.	

Information Category	Disclosure Timing and Procedures	Related Processes
Quarterly Condensed Financial Statements	IBRD's condensed quarterly financial statements and the accompanying condensed Management's Discussion and Analysis (MD&A) are publicly available as follows:	
	CTR prepares these documents and publicly discloses them after clearance for issue. They are disclosed 45 days after the end of the reporting period through two primary public sites:	
	(a) the United States Securities Exchange Commission (SEC), accessible through the EDGAR system at: <a href="http://www.sec.gov/edgarhp.htm">http://www.sec.gov/edgarhp.htm</a> , and,	
	(b) the World Bank Treasury website: <a href="http://treasury.worldbank.org/">http://treasury.worldbank.org/</a> .	
3. Public Bond Offering Documents	These documents are prepared by LEGFI and publicly disclosed after settlement date through the United States Securities Exchange Commission accessible via the EDGAR system at <a href="http://www.sec.gov/edgar/searchedgar/webusers.htm">http://www.sec.gov/edgar/searchedgar/webusers.htm</a> .	
	After filing with the United States Securities Exchange Commission, a selection of these documents may also be made available on the World Bank Treasury website at <a href="http://treasury.worldbank.org/">http://treasury.worldbank.org/</a> .	
IBRD Annual Information     Statement	This document is prepared annually by Bank's Treasury - capital markets department, typically in September, for the information of investors. It is disclosed through two primary public sites:	
	<ul> <li>(a) the United States Securities Exchange Commission, accessible through the EDGAR system at <a href="http://www.sec.gov/edgarhp.htm">http://www.sec.gov/edgarhp.htm</a>, and</li> <li>(b) the Bank Treasury website <a href="http://treasury.worldbank.org/">http://treasury.worldbank.org/</a></li> </ul>	
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B-3: IDA Financial Information		
Information Category	Timing of Disclosure and Process	Related Processes
IDA audited annual financial statements	IDA audited Annual financial statements (including MD&A, notes to the financial statements with all significant accounting policies, and other detailed disclosures) are publicly disclosed after the EDs have approved them.  The IDA Financial Statements are disclosed in the Bank's <i>Annual Report</i> .	
Replenishment terms     and conditions of IDA	Publicly available and published in the Summary Proceedings of Annual Meetings.	
Information on current replenishment negotiations	Media and civil society organizations are informally briefed at key stages of the process.	
Chairman's summaries of replenishment meetings	IDA replenishment papers (including papers written for information or consideration during replenishment negotiations) are made publicly available on the IDA website on or one day prior to the first day of the replenishment meetings.  The Chairman summaries are disclosed on the IDA website, after the conclusion of replenishment meetings and following oral briefing to the Board and Board distribution.	Replenishment papers which contain information on contributions from individual donors to IDA are considered restricted information, falling under the exception pertaining to Financial Information (Exception 10 (a)).
5. Chairman's summaries of IDA mid-term review meetings	Chairman's summaries of IDA mid-term review meetings (including papers written for information or consideration at, or follow-up to IDA mid-term review meetings) are publicly disclosed in the same way as for replenishment meetings.	

B-4: Budget		
Information Category	Timing of Disclosure and Process	Related Processes
1. The World Bank (IBRD/IDA) budget	Following consideration and approval by the Board of EDs, the World Bank budget is made publicly available and posted on the Bank's external website.  • Upon completion of the Board's deliberative process, BPS transmits the budget document to SECPO, indicating on the Board eSubmission form that the document is to be disclosed. SECPO notifies IDU that it is publicly available. IDU then changes the security classification to "Public" and posts it on the Bank's external website.	Classification. As with all Board papers that are routinely disclosed after the deliberative process, when the originating unit transmits the budget document to SECPO, it is classified in accordance with the Information Classification and Control Directive. IDU changes the classification to 'Public" when SECPO notifies IDU that the budget document should be disclosed.

### C. BOARD INFORMATION

C-1: Board of Governors		
Information Category	Disclosure Timing and Procedures	Related Processes
List of members, Governors     and voting power	Publicly available:	The information on the external website is constantly updated to reflect any changes.
	(a) In the Bank's <i>Annual Report</i> and (b) On the Bank's external website.	
Summary Proceedings of Annual Meetings	SEC prepares and distributes <i>Summary Proceedings</i> to the Board. Upon distribution, SEC notifies IDU that it is publicly available. IDU then changes the classification to "Public" and posts it on the Bank's external website.	
Reports of the Executive     Directors recommending     decisions to the Boards of     Governors on such matters as     capital increases and     replenishments	Publicly available:  (a) Upon approval by the Board of Governors, Reports of the Executive Directors are submitted by SEC to IDU for disclosure  (b) In the Summary of Proceedings	

Resolutions adopted by the Boards of Governors at the Annual Meetings or through a vote by mail	Publicly available:  (a) Upon approval by the Board of Governors, SEC submits Governors Resolutions are submitted by to IDU for disclosure  (b) In the Summary of Proceedings	
5. Statements of the Governors and of the President during the Annual Meetings	Publicly available:  (a) On the Annual Meeting's external website.  (b) In the Summary of Proceedings	
6. Agendas and papers prepared by Bank and/or IMF staff and statements and communiques produced by participants for meetings of the Development Committee	Publicly available on the Development Committee's external website.  (a) SEC posts agenda after issuance as DC document (b) SEC posts DC papers during the DC meetings (c) SEC posts statements by President, Managing Directors, DC members and Observers during the DC meetings (d) SEC posts communiques at the completion of the DC meetings	

C-2: Board Records		
Information Category	Disclosure Timing and Procedures	Related Processes
Minutes of formal     Board meetings	Disclosed after the EDs approves the minutes.  SECPO prepares the minutes and distributes them to the EDs for approval. Upon approval, SECPO notifies IDU to disclose the document, and IDU files the document as "Public" and posts it on the Bank's external web.	If the Board minutes include "Confidential" and "Strictly Confidential "information, the minutes are classified accordingly and become eligible for declassification according to declassification timelines.
Minutes of Board     Committee meetings	SECPO prepares the Committee minutes and distributes them to the Committee members for approval. Upon approval, SECPO notifies IDU to disclose the document and IDU files the document as "Public" and posts it on the Bank's external website.	If the Board Committee minutes include "Confidential" and "Strictly Confidential" information, the minutes are classified accordingly and become eligible for declassification according to approved declassification timelines.
5. Chair Summaries of Board meetings  (Previously known as summings-up or summary of discussions; also referred to as Board summaries.  (This includes Board discussions of Board operations, CASs, and other policy, strategy or topical issues)	<ul> <li>SECPO distributes the Chair Summaries to the EDs for their consideration, indicating that they are made available to the public after the closing date.</li> <li>After the closing date SECPO notifies IDU that the document is available to the public. IDU changes the classification to "Public" and posts it to the external website.</li> </ul>	
6. Chair Summaries of Committee of the Whole (COW) meetings	The final, approved document is publicly available at the end of the Board's deliberative process:  The final draft of Chair Summaries is circulated to EDs for consideration, indicating that it is made available to the public after the deliberative period.  SECPO notifies IDU to disclose the document. IDU changes the classification to "Public" and posts it to the external website.	

Information Category	Disclosure Timing and Procedures	Related Processes
7. Summaries of Discussion	SECPO prepares and posts Summaries of Discussion on eBoard for a 24-hour comment period. After the comment period has elapsed, SEC notifies IDU that it should be made publicly available. IDU then changes the classification to "Public" and posts it on the Bank's external website.	Summaries of Discussion consist of staff notes of the Board meeting discussion and are not an approved record. Remarks are not attributable to individual speakers. Summaries of Discussion are not prepared for all Board meetings.
8. Reports to the Board from its Committee (Green Sheets)	After a meeting of a standing Board committee, SECPO prepares a Report to the Board from its Committees (Green Sheet) and distributes it to the Board. After distribution, if no subsequent Board meeting is expected, the first part of the Green Sheet (Green Sheet Summary) is disclosed. SECPO notifies IDU by email that the Green Sheet Summary should be made publicly available. IDU posts the Green Sheet Summary on the Bank's external website.	Following the Committee discussion, SECPO drafts the Summary of Board Committee Meeting (Green Sheet) and proceeds with the clearance from key parties participating at the Committee meeting, Committee Chair, and the Committee members. After finalizing and distributing the Green Sheet to the Board, SECPO notifies IDU whether the document (Summaries - Part A only) may be made available to the public.  However, some Committee discussions may deal with issues that fall under the exceptions of the Al Policy. In such cases, the Green Sheets would be classified as "Confidential" or "Strictly Confidential" and would not be disclosed until they become eligible for declassification according to the approved declassification timelines.  Green Sheets for items that have subsequent Board meetings are considered part of the deliberative record and are not be disclosed. In accordance to the Al Policy's treatment of declassification, these Green Sheets are disclosed after 10 years.  IFC and MIGA are updating their respective Disclosure Policies. Until these are revised, disclosure of Green Sheets summarizing meetings that involve either or both of these institutions require Board approval.

Information Category	Disclosure Timing and Procedures	Related Processes
9. Summary Proceedings of the Annual Meetings	SEC prepares Summary Proceedings. The Summary Proceedings of the Annual Meetings are disclosed by SECPO (via IDU) after approval by the Corporate Secretary, following the Annual Meetings. Upon distribution to the EDs, SECPO notifies IDU that it is publicly available. IDU changes the classification to 'Public" and posts it on the Bank's external website.	
10. Executive Directors' Work     Program Overview and its update	SEC prepares the EDs' Work Program and distributes it to the EDs each year. Upon distribution to the EDs, SECPO notifies IDU that it should be made publicly available. IDU changes the classification to "Public" and posts it to the external website.	
11. Board Calendar	SECPO prepares the ED's calendar. Twice a month, SECPO notifies IDU that the calendar is publicly available. IDU files the document as "Public" and posts it on the Bank's external website.	
12. Membership of Standing Board Committees	SECPO updates the membership when there is a change, and notifies IDU. IDU files the document as "Public" and posts it on the Bank's external website.	
	C-3: Administration	
Information Category	Disclosure Timing and Procedures	Related Processes
1. Organizational Information	ECR makes publicly available on the Bank's external website the Bank's vice presidential units, names and profiles of senior management, and the organizational chart at the vice presidential unit level.	
2. Employment Opportunities	Employment opportunities and descriptions of positions are routinely disclosed for externally advertised positions on external HR website.	Employment opportunities and descriptions of positions externally advertised

Information Category	Disclosure Timing and Procedures	Related Processes
3. Staff Manual	The Staff Manual, which contains the Principles of Staff Employment and the Staff Rules, is made publicly available on the Bank's external website (Human Resources page).	Information in the Annexes to Staff Rules are considered restricted information and not disclosed.
Information from Office of Diversity and Inclusion	Routinely disclosed on the Bank's external Human Resources website <a href="http://www.worldbank.org/hrs">http://www.worldbank.org/hrs</a> Link <a href="here">here</a>	
5. Administrative Tribunal's decisions	Posted on a rolling basis as decisions are made on the Administrative Tribunal's external website.	

# B. Public Availability of Certain "Financial" and "Administrative" Documents

All documents listed are reflected in the World Bank Policy on Disclosure of Information (2002) ("2002 Disclosure Policy"), except for the documents marked with an asterisk, which are reflected in the Board paper, *World Bank Disclosure Policy: Additional Issues Follow-up Consolidated Report (Revised)* (R2003-0112/10).

Note: As reflected in the Bank's Policy on Disclosure of Information (2002), the "World Bank Group Directory" was a document approved by the Board for disclosure. However, the Bank no longer makes it public for security and safety reasons.

Type of Information	Disclosure Process/Status	
Financial Information about the Bank		
Financial statements of the Bank	Published (quarterly)	
Annual Audited Financial Statements as of the June 30 fiscal year-end (These include a balance sheet; statements of income, comprehensive income, and changes in retained earnings and of cash flows; statements of member subscriptions to capital stock and voting power; and a summary statement of loans by borrowing member. Notes to the financial statements include information on all significant accounting policies and other detailed disclosure. Such disclosures include the composition of capital stock; return/cost data, maturity, and currency composition of the loans, investments and borrowings of the Bank; and a summary description of the Staff Retirement Plan)	Published in the Bank's Annual Report and annual update of the Bank's Information Statement	
Management Discussion and Analysis (MD&A). (These present selected financial data, e.g., the average cost of borrowings, average interest rate on loans, return on liquid investments and on loans; other financial ratios that management deems significant; financial product information; a discussion of the Bank's financial policies and risk management strategies; and a discussion of significant operating results.)	Published with annual financial statements	
Condensed presentation of the financial statements, reviewed by the Bank's external auditors, and the accompanying condensed MD&A.	Published fiscal year quarters of September, December, and March	
Overall borrowing plan	Usually announced publicly at the beginning of fiscal year (July 1)	
Other documents related to public offerings	Publicly available when laws and regulations governing the market require that they be filed with a government agency	

Type of Information		Disclosure Process/Status	
Fina	Financial Information about the Bank		
1.	Detailed statements of all loans and credits	Published monthly	
2.	Information on the finances of IDA	Published in the IDA audited annual and unaudited quarterly financial statements	
3.	IDA replenishment terms and conditions	Published through the Summary Proceedings of Annual Meetings	
4.	Information on current replenishment negotiations	Made public through press briefings at key stages of the process	
5.	Chairman's summaries of replenishment meetings and related papers for information and consideration during replenishment negotiations	Public	
6.	Chairman's Summaries of IDA Mid-Term Review meetings, and papers written for information or consideration at, or as follow-up to, IDA Mid-Term Review meetings*	Public	
7.	Budget Paper* (recommending Board approval of the Bank's administrative budget)	Public (after Board authorizes the budget and paper is finalized)	
Adr	ninistration		
Boa	ard of Governors		
8.	The Bank's Annual Reports (include list of members, Governors and voting power)	Public	
9.	Summary Proceedings at Annual Meetings (contain all speeches related to the Bank; decisions at Meetings; reports of the EDs recommending decisions on matters like capital increase and replenishments; and reports of committees, such as the Development Committee)	Public	
Mai	nagement		
10.	Operational Policies and Bank Procedures, and Operational Memoranda issued after January 1, 2002; Operational Directives (ODs) issued after March 1989.	Public	
11.	Operational Manual Statements issued before March 1989	Public if authorized by OPCS Director concerned in consultation with LEVPU	

Type of Information		Disclosure Process/Status
Staf	f	
12.	Organizational charts	Public
13.	Description of positions advertised for recruitment	Public
14.	Basic employment data of the Bank	As published in the Annual Report
15.	General information on the Bank's salary structure, methodology employed in establishing salary levels, staff benefits, and similar information	Public
16.	Bank's broad objectives and strategy in recruiting, placing, redeploying, and retaining staff	As published in brochures and other documents prepared specifically for publication
17.	Staff Manual, containing the Principles of Staff Employment and the Staff Rules (after removal of any references to individual staff) *	Public
18.	Staff Compensation Paper (after removal of any proprietary information and non-public information concerning third parties), beginning in 2004, with the Board paper titled, 2004 Review of Staff Compensation for the World Bank Group, May 12, 2004.*	Public

# **SECTION IV – EXCEPTIONS**

None.

# SECTION V - WAIVER

- 1. Provisions of the Procedure, unless cited as governed by a policy or other directive or procedure, may be waived by the Al Committee.
- 2. Provisions of the Procedure that originate from policy interpretations issued by the Al Committee may only be revised as a result of a new or revised policy interpretation issued by the Al Committee.

## **SECTION VI – OTHER PROVISIONS**

None.

## SECTION VII - TEMPORARY PROVISIONS

None.

## **SECTION VIII – EFFECTIVE DATE**

This Procedure is effective as of the date on its cover (Effective Date).

### SECTION IX - ISSUER

This Issuer of this Procedure is as stated in the cover page.

### **SECTION X - SPONSOR**

The Sponsor of this Procedure is as stated in the cover page.

### **SECTION XI – RELATED DOCUMENTS**

- Access to Information Policy Implementation Issues Related to Board Records and Papers, June 20, 2011 (COGAM 2011-0010/1).
- 2. Al Interpretations, issued by the AIC.
- 3. Bank Directive: Access to Information.
- 4. <u>Bank Directive Procurement in IPF and Other Operational Procurement Matters</u>, April 1, 2024, Catalogue No. OPS5.03-DIR.119.
- 5. <u>Bank Guidance: Access to Information: Disclosure of Documents related to Emission Reduction Crediting</u> (formerly Carbon Finance), June 2, 2020, Catalogue No. GGS4.01-GUI.118.
- 6. <u>Bank Guidance Disclosure of Audited Financial Statements and Other Financial Management Information,</u> September 13, 2016, Catalogue No. OPS5.05-GUI.170.
- 7. <u>Bank Guidance on Restricted Information in LEG's Possession</u>, May 23, 2018, Catalogue No. LEG4.01-GUI.116.
- 8. Bank Policy: Access to Information, July 1, 2015, Catalogue No. EXC4.01-POL.01.
- 9. Bank Policy: Trust Funds, February 4, 2021, Catalogue No. SEC2.02-POL.104
- Bank Procedure on the Implementation of Board-Related Access to Information Requests, June 13, 2017, Catalogue No. SEC9.05-PROC.102.
- 11. <u>Bank Procedure Procurement in IPF and Other Operational Procurement Matters</u>, March 28, 2024, Catalogue No. OPS5.03-PROC.247.
- 12. <u>Guidance for Financial Management Specialists on World Bank Policy on Access to Information</u>, OPSOR, Published June 2010, updated May 15, 2015.
- 13. Instructions: Investment Project Financing Implementation Support to Project Completion.
- 14. Instructions: Preparation for Investment Project Financing.
- 15. Instructions: Project-based Guarantees.
- 16. OP/BP 4.01, Environmental Assessment.

- 17. OP/BP 4.02, Environmental Action Plans.
- 18. OP/BP 4.03, Performance Standards for Private Sector Activities
- 19. OP/BP 4.10, Indigenous Peoples.
- 20. OP/BP 4.12, Involuntary Resettlement.
- 21. OP/BP 8.60, Development Policy Financing.
- 22. <u>Toward Greater Transparency Through Access to Information The World Bank's Disclosure Policy</u>, December 10, 2009 (R2009-0259/2; IDA/R2009-0273/2).
- 23. World Bank Access to Information Staff Handbook.
- 24. World Bank Group Directive: Country Engagement, July 1, 2014, Catalogue No. OPCS 5.01-DIR.01.
- 25. World Bank Group Directive: Information Classification and Control Directive, June 28, 2024, Catalogue No. MDC4.01-DIR.128.
- 26. World Bank Policy on Access to Information, June 27, 2013 (SecM2013-0301; IDA/SecM2013-0401).
- 27. World Bank Policy on Access to Information Proposed Modification, March 25, 2013 (R2013-0051; IDA/R2013-0072).
- 28. World Bank Policy on Access to Information Proposed Modification, June 24, 2015 (R2015-0129; IDA/R2015-0191).
- 29. World Bank Policy on Access to Information: Guidance for Financial Management Staff, Version: June 24, 2010, OPCS, Financial Management Unit (OPCFM).
- 30. World Bank Group Procedure: Country Engagement, July 1, 2014, Catalogue No. OPCS 5.01-PROC.01.

### **SECTION XII - REVISION HISTORY**

- 1. The revision of November 2024 for this Procedure simplifies the legal framework applicable to the Access to Information Policy by separating the preceding Bank Access to Information Directive/Procedure (Directive/Procedure) into two separate documents:
  - (a) the Bank Directive: Access to Information (Directive), which includes the main text of the Directive/Procedure revised to include the text of Annexes 1 and 4 to the Directive/Procedure into the main portion of the Directive; and
  - (b) this Procedure, which includes the text of Annexes 2 and 3 to the Directive/Procedure.

Questions regarding this Procedure should be addressed to the Sponsor.