Overview of our approach to Information and Disclosure

The Eastern and Southern African Trade and Development Bank Group ('TDB Group', 'we', 'us') recognizes that transparency and accountability are key to fulfilling its development mandate and to reinforcing the ties of public trust in TDB Group and promoting the trust of its clients and stakeholders. Our Information and Disclosure Policy ("**IDP**") (a copy of which is available on request) sets out the approach the TDB Group will take to making information available to the public, either as a routine matter or upon request. The IDP also clearly defines the information which TDB Group will not disclose.

Guiding Principles

Our IDP adopts the following guiding principles:

1. **Presumption of disclosure** - Information will be disclosed unless: (i) the information is contained on the list of exceptions (negative list). in this IDP; (ii) the information is required to be withheld under any applicable laws or regulations; or (iii) there is some other compelling reason not to disclose the information.

2. **Policy governance** – The approach of TDB Group regarding the scope of information that it makes available to stakeholders and/or members of the public either as a routine matter or upon request shall be governed by the IDP.

3. **Clear procedures** – TDB Group will provide clear procedures for making information available, including a consistent process for redacting protected information.

4. **Maximizing access to information** - TDB Group will aim to have greater outreach to all its stakeholders; and maximise existing communication channels with those stakeholders.

5. **Limited List of Exceptions** – Restrictions on disclosure to third parties with no pre-existing relationship with TDB Group of certain categories of TDB Group information will be limited. Any exceptions to disclosure will be predicated upon the possibility, narrowly and clearly defined, that the potential harm to interests, entities or parties arising from the disclosure of information would outweigh the benefits. These restrictions are stipulated in the list of exceptions under the IDP.

6. **Proactive Disclosure** - TDB will proactively disclose documents eligible for disclosure, through various communication channels. The TDB website will typically be the vehicle used for proactive disclosure, with other means used as appropriate.

7. **Right to Appeal** - When denying access to information requested by any party, whether there is a pre-existing relationship or not with TDB Group, TDB Group will provide an explanation for its decision. Persons with legitimate concerns about TDB Group's level of disclosure will be accorded the means to appeal decisions denying access to information through a specific appeals mechanism.

8. **Provision for Review** - The IDP will be subject to follow-up and revision to ensure that best practices are followed and that the IDP remains relevant to stakeholders and is comparable to similar policies of comparable institutions.

Disclosable information

TDB Group will routinely publish the following information (subject to any redactions needed for protected information):

(i) General information describing how TDB Group processes an investment using its own resources (loan, equity, quasi-equity, guarantee, etc) and blended finance instruments.

(ii) Governance-related information such as the Charter, list of shareholders, identity of members of the Board of Directors and Board of Governors.

(iii) Reports and policies on the TDB Group and its subsidiaries' social and environmental management.

(iv) Reports in relation to TDB Group and its subsidiaries' mandate as applicable and the developmental outcomes arising from their interventions.

(v) Redacted reports regarding the projects that TDB Group and its subsidiaries finance through their own resources and blended funds as well as project monitoring and evaluation reports.

(vi) Reports on third-party funds managed or administered by the Eastern and Southern African Trade and Development Bank and the Trade and Development Fund.

(vii) Annual Reports of the Eastern and Southern African Trade and Development Bank and the Trade and Development Fund within 120 days of approval by their respective Boards of Governors.

(viii) Newsletters prepared by TDB Group for public circulation.

List of Exceptions to disclosure

To ensure that TDB Group operates lawfully and maintains confidentiality when applicable, there are a number of restrictions on TDB Group's ability to disclose certain types of information. This includes:

- Deliberative information and incomplete reports
- Information and communications involving the President, Board of Directors and the Board of Governors
- Legal, disciplinary or investigative matters
- Confidential information relating to shareholders, private-sector entities or third parties
- Certain types of corporate administrative and financial information
- Information that could compromise the safety and security of TDB staff or that might pose serious harm to the environment.
- Personal information of TDB staff

TDB Group's Prerogative to Disclose or Withhold Information

TDB Group retains the right to disclose information on the list of exceptions as required under this IDP; for example, where it concludes that the harm of disclosure is outweighed by the harm of withholding the information or that the public's interest in the information justifies disclosure or that failure to disclose would compromise the interest(s) protected by the exceptions in this Policy or TDB Group's ability to achieve its development mandate.

Process for responding to Information Requests

Requests for information may be submitted to TDB in writing by electronic means, mail. Requests should describe the type of information requested including, if possible, its title and the date (or approximate date) it was produced. TDB Group will acknowledge written information requests within 10 working days and provide a full response within 20 working days. In its response, TDB Group shall either provide the requested information or the reasons why the request has been denied, indicating the specific provision(s) in this Policy that justify the refusal. TDB Group reserves the right to take more time (or where necessary less time) in some special circumstances and in cases of complex requests, or requests requiring review by, or consultations with, internal TDB Group stakeholders or the Board.

TDB Group may also inquire into the identity or intent of the requester if necessary to assess whether any exceptions to disclosure apply.

Appeals Mechanism

Persons with legitimate concerns about TDB Group's omission or refusal to disclose information in accordance with this Policy will have access to effective and responsive two-stage appeals mechanisms within TDB Group. The requester may make a case that TDB Group has violated the IDP by improperly or unreasonably restricting access to information that it would normally disclose under the IDP; or to make a public interest case to override the IDP exceptions that restrict the information requested.

General information about TDB Group and its activities may be obtained online at TDB Group's website, www.tdbgroup.org. The information can also be provided upon written request. Requests for specific information may be made to the following email address: informationdiclosure@tdbgroup.org.

This is a summary overview of TDB Group's approach to information disclosure and is intended for general informational purposes only. Users should not rely solely on this summary when submitting information requests, or for decision-making and compliance purposes. The IDP itself is available upon request.