

DRAFT



Draft proposal for updating CABEL's Access to Information Policy

Access to Information Unit - Secretariat

This document is a preliminary proposal that has not been submitted to the competent authorities for approval.

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I. INTRODUCTION

The transparency that has resulted from the deepening of democracy at the global level must be reflected in the behavior of multilateral development banks, which will be required to comply with the highest international standards of transparency and access to information, both regulatory and technical, in order to provide details of where, when and how the resources of the operations they finance are used. Transparency is a key element of accountability, which in turn strengthens corporate governance and promotes the relationship with stakeholders in order to improve the design and execution of operations and strengthen development results.

Transparency is a process by which the actions and decisions made by development banks are made accessible, visible, and understandable. The right of access to information is a tool for transparency, and the latter complements an adequate accountability system.

The Central American Bank for Economic Integration (CABEI) has ratified its commitment to strengthening transparency through the approval of the Declaration on Access to Information issued by the Board of Governors, CABEI's highest authority. This declaration reflects CABEI's clear intention to become a pioneer in the Central American region in terms of access to information, ensuring that it is disclosed to the public in a clear, timely and appropriate manner, unless such information is protected by any of the exceptions established in this policy.

II. OBJECTIVE

Develop the principles and establish mechanisms to maximize access to public information in CABEI's possession so that it can be accessed by citizens and improve their ability to interact with the Bank, as well as to promote stakeholder trust and give greater visibility to the Institution and its activities.

III. SCOPE

This policy shall be applied to information in CABEI's possession in order to promote access to public information and protect reserved information established in the exceptions to disclosure of these regulations.

CABEI enjoys the privileges and immunities conferred by its Constitutive Agreement, among which is that the "Bank's archives shall be inviolable and shall enjoy absolute immunity". Consequently, the approval of this policy shall not be considered or understood as a waiver of any of the Bank's immunities.

IV. ABBREVIATIONS AND TERMS

- CABEI or Bank: Central American Bank for Economic Integration.
- AIP or Policy: Access to information policy.
- AIU: Access to Information Unit.
- CCAI or Committee: Communications and Access to information Committee.
- GTI: Information Technology Management.

V. RELATED DOCUMENTATION

- Constitutive Agreement of CABEL.
- Regulations of the Organization and Administration (ROA) of the Central American Bank for Economic Integration.
- Information Security Policy.
- Institutional Communication Policy.
- CABEL Data Management Manual.

VI. DEFINITIONS

- **Classification:** procedure carried out by CABEL personnel, through the technological tools provided for such purpose, in which an information asset is assigned a classification in accordance with the applicable regulations.
- **Data:** records and symbolic representations of a quantitative or qualitative attribute or variable that can be used for reference, analysis or other purposes.
- **Proactive disclosure:** routine activity that consists of periodically disclosing public information in order to make CABEL's operations and activities visible.
- **Disclosure:** making information previously classified as public available to the public through CABEL's official channels, either proactively or in response to requests for information submitted by the public.
- **Document:** information that is recorded in a tangible medium or that, having been stored in an electronic or other medium, is retrievable in a perceptible form.
- **Final documents:** are all documents that have the final approval of the Information Officers.
- **Public entities:** are those bodies or institutions that require information through court orders and requests of an administrative nature with the purpose of controlling the use of public resources and the investigation of facts of any kind that could be considered as alleged crimes, administrative misconduct or of any other nature.
- **Information:** refers to any type of communication or representation of knowledge including textual, numerical, data of any type, graphic, cartographic, oral, audiovisual and found in any format, transmission or storage medium, whether printed, magnetic, optical, digital or audiovisual.
- **Exceptions to disclosure:** categories of information that shall not be subject to disclosure under any circumstances and that are defined in this policy.
- **Information Officers:** the Information Officers are the heads of each of the Bank's dependencies. They are responsible for ensuring that the information assets of their

respective dependencies are properly classified in accordance with the Access to information policy.

VII. DEVELOPMENT

GENERAL PROVISIONS

A. PRINCIPLES

Article 1. Principles. This policy is based on the following principles:

- (a) Maximize access to information.** CABEL is committed to disclosing as much public information as possible, provided that it is not protected by the exceptions established in Article 16. To this end, the Bank employs the necessary practical means to ensure that information is disclosed in a clear, timely and appropriate manner, through final documents and data, among other formats. Under this presumption in favor of disclosure, the Bank promotes access to information proactively and in response to requests for information submitted by the public.
- (b) Clear and delimited exceptions.** The Bank promotes transparency, openness and accountability through Access to information. However, there are certain categories of information where the legitimate interests of the Bank and its counterparties need protection to avoid real, demonstrable and identifiable harm. Therefore, exceptions to disclosure are based on a determination that disclosure of certain categories of information would cause greater benefits.
- (c) Guarantee of disclosure in the business cycle.** CABEL recognizes the importance of external stakeholders, especially those that may be impacted by an operation, having access to key public information in a timely manner in order to improve the design, acceptance and execution of operations, promoting the best social and environmental outcomes and minimizing any risks.
- (d) Good governance and continuous monitoring.** The Bank oversees compliance with effectiveness of its policy through a governance and structure designed to stimulate good practices, identify lessons learned and provide accountability to the public. To achieve these purposes, CABEL: (i) monitors the implementation of the policy through specific and public compliance indicators, (ii) makes its best effort to ensure that the Performance Management System takes into consideration, where appropriate, the proper application of the AIP by staff; (iii) in disciplinary and sanctioning matters, handles complaints and internal processes in accordance with the governance and regulations applicable in these matters.

B. ACCESSIBILITY

Article 2. Language. The Bank will disclose information primarily in the Bank's official language, which is Spanish, and will arrange for translations into English or other languages when deemed appropriate. Likewise, the Bank shall be guided by the following parameters:

- (a)** Disclosure of environmental and social information will be consistent with CABEL's Environmental and Social Policy and its regulatory framework.
- (b)** Upon request, information will be provided in the language in which it is available.

Article 3. Formats. For the disclosure of public information, CABEL will seek accessibility to the information through formats that allow its content to be read by the greatest number of people possible and through electronic systems generally used for this purpose. In accordance with the principle of maximizing access, the disclosure of open data will be made through formats that allow its downloading, use and reuse.

Article 4. Effective communication of information. CABEL will disclose public information on its website by subject matter, in sequential or chronological order, under strategic and institutional guidelines, with a public-focused approach, among other classifications, with the objective of generating comprehensible access to information and fostering a meaningful relationship with all stakeholders.

Article 5. Drafting format. For routine disclosure documents, the Bank will encourage the use of simple, precise language and understandable lexicon so that the general public can understand their content.

Article 6. Reasonable accommodation for persons with disabilities. The Bank will take into consideration the progressive implementation of modifications and reasonable accommodations to promote access to information for people with disabilities.

Article 7. Continuous improvement and relationship with external stakeholders. To maximize the impact of the policy, CABEL will develop and implement an outreach plan with external stakeholders in order to identify public needs and promote access to information, exchange knowledge, improve practices and generate spaces for dialogue.

C. ROUTINELY DISCLOSED INFORMATION

Article 8. Predictability of public information to be disclosed by the Bank. To generate greater public awareness of the Bank's commitment to Access to information and to generate predictability, it will be made available to the public:

- (a) An interactive, illustrative and non-exhaustive list of routine disclosure documents. This list shall be updated regularly, in accordance with progress in the implementation of the policy and the classification assigned by the Information Officers.
- (b) Key indicators of compliance and implementation of the policy so that, in real time and as information is produced, the public will be able to know how CABEL is implementing the regulations. These indicators will include: document disclosure averages, total number of documents disclosed and most downloaded, declassified information rates, trends in the processing of requests for information, and response averages, among other indicators that provide a clear picture of the implementation of the AIP.
- (c) Summaries of information requests received and responses provided. In those matters where information is provided that is not routinely disclosed, it will be made available to the public in a special section of the external website.

Article 9. Declassification of information. The Bank will declassify information, ex officio and upon request, including historical information, through processes that will take into consideration:

- (a) Whether the information has lost sensitivity over time.
- (b) The nature and content of the information.
- (c) Whether the information is in the public interest.
- (d) Whether the information is the property of the Bank or of a counterparty.
- (e) If the cause that gave rise to the initial classification of the information as reserved has been extinguished.
- (f) The exceptions set forth in this policy.

Article 10. Disclosure of public versions. The Bank may issue public versions of documents containing public and confidential information, eliminating information protected by exceptions to disclosure.

Article 11. Access to information through data. In order to seek a better understanding of the information in its possession, taking into account its development responsibilities and the impact of its activities, the Bank will promote the disclosure of:

- (a) Data, statistics, indexes, among other key qualitative or quantitative attributes, about its activities, operations and performance.
- (b) Open data will be made available to the public through a platform that will allow them to be used, reused and redistributed freely by anyone. To this end, the Bank will prepare an Action Plan that will be implemented progressively, programmatically and as the data is verified by the Information Officers.

RESPONSIBILITIES

A. GENERAL RESPONSIBILITIES

Article 12. The Bank's Personnel. Bank Personnel are responsible for:

- (a) Assign the corresponding classification to the information, in accordance with the regulations in force, and store it in the Official Information Repository designated by the Bank for this purpose.
- (b) Disclose the information classified as public on the Bank's website, in accordance with the technical protocols established for this purpose and in accordance with the classification inventory of the dependency to which the staff member belongs, observing the established disclosure terms.
- (c) Communicate, in a clear and effective manner, the implications of the information management policy to CABI borrowers, third parties or other counterparties. This communication will seek to ensure that any of the Bank's counterparties understand the implications of the policy in the negotiation, formulation of agreements and contracts, preparation of documents, among other activities that involve producing or receiving information.
- (d) Support any request for information submitted by the public to their dependency and the Access to Information Unit.
- (e) Any other responsibility arising from the application of this policy and the corresponding complementary regulations.

Article 13. Information Officers. Managers, heads of offices, department heads and country chief officers are responsible for the information, must ensure that the personnel under their charge effectively comply with this policy and that they properly use the technological tools intended for this purpose, including those required to classify and disclose the information, as well as to provide attention to requests for information. Additionally, prior to the disclosure of any type of information, in the form of final documents, data, or others, the Information Officers must ensure that it has been submitted for authorization or approval by the corresponding authorities.

In particular, the Secretariat will be responsible for information on the Board of Governors and the Board of Directors, and will therefore be in charge of classifying the recordings of the proceedings, verbatim transcripts, minute books, documentation, decisions and correspondence of the Board of Governors and the Board of Directors. In addition, this position will be responsible for recording the final decisions of the Executive Presidency.

B. RESPONSIBILITIES OF THE MONITORING BODIES

Article 14. From the Secretariat - Access to Information Unit. The Bank's Secretariat shall be responsible for ensuring the management, implementation and correct application of this policy, as well as for proposing updates to it. For such purpose, it shall have the Access to information Unit, which shall have the following functions:

- (a) Provide technical support to all Bank staff to properly implement the policy.
- (b) Coordinate the implementation of the AIP with the Information Officers of each dependency.
- (c) Create the necessary guidelines, directives and protocols to guide staff on the implementation of the policy.
- (d) Coordinate the processing, monitoring and responses to requests for information submitted by the public, including providing technical support to the heads of each Bank dependency on the determination of whether information is public or reserved.
- (e) Create quality control, monitoring and evaluation processes so that the processes of classification, disclosure, response to requests for information, among others necessary for the implementation of the AIP, are effective.
- (f) Monitor the registration and timely classification of information in the corresponding application.
- (g) Supervise and ensure that the information disclosed on the Bank's website complies with the principles contemplated in this policy, with an approach based on accessibility.
- (h) Monitor that the disclosure of information classified as public is made in a timely manner, on the Bank's website, in accordance with the principles and guidelines of this policy.
- (i) Coordinate with the Information Technology Management (GTI) the identification, creation, implementation and operation of all IT systems and platforms necessary for the implementation of the policy.
- (j) Prepare and submit to the Communications and Access to Information Committee (CCAI) reports on findings, challenges, lessons learned and recommendations regarding the implementation of the policy by the Bank's dependencies.
- (k) Provide technical support to the CCAI and to any body or instance within the framework of its competencies.

- (l) Communicate and raise awareness among CABEL staff and external audiences on issues related to the proper implementation and application of the AIP following the guidelines of the Communication Strategy and applicable Bank protocols.
- (m) Coordinate all activities related to CABEL's relationship with external stakeholders exclusively within the framework of the implementation of the AIP, which should be carried out in coordination with other dependencies of the Bank when appropriate.
- (n) Any other activity aimed at promoting the adequate application of the policy.

The Communications and Access to Information Committee. The Communications and Access to Information Committee is CABEL's highest collegiate body in matters of access to information. Its composition is governed by the Regulations of the Board of Directors and the Attached Dependencies (RIDDA) and, in terms of access to information, it has the following attributions:

- (a) Supervise the general application of this policy.
- (b) To resolve discrepancies in information classification criteria or internal regulations that may arise among the Bank's areas.
- (c) To hear, evaluate and resolve, in the first instance, requests for review received from external applicants who have been denied access to information, in accordance with this policy.
- (d) To hear, evaluate and resolve, in sole instance, the requests for information submitted by public entities.
- (e) Approve the Management and relationship plans with external stakeholders, among others, aimed at promoting the effective implementation of the policy.
- (f) Interpret the provisions of this policy in accordance with its guiding principles.
- (g) Approve the Bank's Information Classification Inventory and its corresponding updates.
- (h) Approve any type of report on the activities in the implementation of the policy, including its annual report.
- (i) Know the reports prepared by the IAU on the implementation of the AIP and instruct the Bank's dependencies to proceed with the execution of the identified corrective measures.
- (j) Establish service rates and regulations, if necessary and in exceptional situations, to meet requests for information that involve a high investment of resources.
- (k) Determine how to proceed in cases not foreseen in the policy.
- (l) To submit to the Board of Directors the matters it deems appropriate.

Article 15. When the Communications and Access to Information Committee confirms a denial of access to information, the requesting party may file an appeal to the CABEL Board of Directors through the Bank's Secretariat.

EXCEPTIONS TO DISCLOSURE

Article 16. CABEL will disclose information in its possession that is not protected by any of the exceptions to disclosure set forth in this policy. The categories of reserved information are based on a determination that disclosure would result in actual, demonstrable and identifiable harm to the Bank and its counterparties. To protect these legitimate interests, the following eight exceptions to disclosure contain an illustrative and non-exhaustive list of information that the Bank will not make available to the public:

(a) Personal information. Information whose disclosure would affect the privacy of Bank personnel and any individual:

- (i) Personal, financial and salary information of officers, employees and other personnel, retired or former employees, as well as their patrimonial situation declarations.
- (ii) Details of recruitment and selection processes, as well as personnel files.
- (iii) Information related to investigative and disciplinary processes of the personnel.
- (iv) Personal communications.
- (v) Information that identifies or allows the identification of any individual who is not part of the Bank's personnel.

(b) Deliberative information. Information whose disclosure would affect the decision-making process or inhibit the free exchange of ideas in the deliberative and internal processes of the Board of Governors, the Board of Directors, the committees and the Administration, as well as between the Bank and its member countries, private sector clients or third parties with which it has relations. The protection of this information seeks to safeguard a space for the Bank to reflect, debate and build consensus outside of public scrutiny:

- (i) Verbatim transcripts (verbatim) and minutes of meetings of any CABEL body.
- (ii) Any type of statement by governors, directors, Executive President and Vice President, any member of the Bank's staff or invited guests, which has been made in the context of an internal meeting of the Institution.
- (iii) Communications of any nature, within and between dependencies, as well as those between the Institution and its counterparts.
- (iv) Non-final documents and inputs, in any type of format, which have been prepared or exchanged during the deliberative processes.

(c) Information on legal, disciplinary and investigative matters. Information whose disclosure would affect the pursuit of disciplinary, investigative and sanctioning processes, as well as the professional secrecy between client and attorney, generating undue litigation and legal risks and undermining procedures established in the applicable regulations of the Institution:

- (i) Information on litigation in process or under negotiation, including related reports or communications.
- (ii) Information on disciplinary and sanctioning matters carried out in accordance with the procedures contained in the Code of Conduct for Directors, Executive President and Controller incorporated in the Regulations of the Organization and Administration of the Bank (ROA), the Code of Ethics and its complementary Regulations and Procedures and the Standards of Conduct Manual.
- (iii) Complaints and investigative processes concluded or in process received by CABEL's Reporting Channel regarding integrity, sanctions, ethics or other similar issues.
- (iv) Files, records, findings and decisions of the committees and dependencies that carry out disciplinary, investigative and sanctioning processes.

(d) Information provided in confidence. Information of which CABEL is not the owner and the disclosure of which would affect the commercial, financial and competitive interests of the borrowing countries, private sector clients or third parties with which it relates:

- (i) Information received in confidence and prior to establishing a contractual relationship.
- (ii) Information protected by a confidentiality agreement entered into prior to the initiation of a relationship with third parties.
- (iii) Information received under a signed contract that includes a confidentiality agreement with any CABEL counterparty, including borrowers, investors, clients, sources of funds, service providers and risk rating agencies, among other information.
- (iv) Information of Private Sector clients, except for proactive disclosure¹.

(e) Detailed administrative and financial information related to the Bank's General Budget and its execution. Information whose disclosure would affect the Bank's development and ability to run its internal financial, administrative and economic system:

- (i) Detailed information on the budgets of operating expenses, capital investments, contributions and special contributions of the Bank, among other information of similar nature and content, as well as that related to the detailed execution thereof.

(f) Information from internal and external control bodies. Information whose disclosure would affect the pursuit, decision or monitoring of decisions, procedures and recommendations adopted by the Bank's internal and external control bodies. The protection of this sensitive and internal monitoring information seeks to safeguard the processes of investigation, analysis, issuance of recommendations, among others, which could be exploited by third parties to the detriment of CABEL:

- (i) Internal Auditing Reports.
- (ii) Controller's Office reports.
- (iii) Technical and supporting documents related to internal and external control, as well as internal evaluations and analyses prepared for the Board of Governors, the Board of Directors, the committees and the Administration, among other information.
- (iv) Reports, technical and supporting documents related to internal control, as well as evaluations and analyses prepared by the external auditors for the Bank's internal consumption.

(g) Financial information. Information whose disclosure would affect CABEL's financial and commercial interests or that could affect the markets in which the Bank operates:

- (i) Financial statements on the funds administered by CABEL.
- (ii) Fund-raising technical sheets.
- (iii) Reports, reports and accounting opinions.
- (iv) Reports on the profitability of portfolios and securities.
- (v) Unaudited financial statements, among other information of similar nature and content.

(h) Information related to the security of CABEL's people, assets and facilities. Information whose disclosure would affect the life and integrity of any individual, as well as CABEL's assets and real estate:

¹ To find out which documents are routinely disclosed in this sector, see Annex 1 of this policy.

- (ii) Information on logistics and transportation arrangements related to shipments of the Bank's assets and documents.
- (iii) Documents related to the security of the Bank's information and its facilities.
- (iv) Crisis, disaster and contingency plans.
- (v) Any information that may compromise the security of the Bank's personnel and any person, among other information of similar nature and content.

SYSTEM FOR REQUESTING INFORMATION AND REVIEW MECHANISM

A. GENERAL ASPECTS

Article 17. Information that is not available on CABEL's official website may be requested through the following means:

- (a) Through a virtual form available on CABEL's official website.
- (b) If the applicant does not have access to the Internet, the request may be submitted in writing to the Access to Information Unit through any of the Bank's offices.

Article 18. CABEL shall make available to the public on its official website a form for requests for access to information, in which the details of the information and/or documents to which access is desired shall be entered. Said form shall contain such data as to clearly identify, as a minimum, the following information:

- (a) Reasonable detail of the required information, in such a way that it can be located, preferably including the date and type of document.
- (b) The applicant's full name, identification, contact e-mail address and country of residence.

Article 19. Requests for information will be analyzed by verifying, initially, that the request makes it possible to identify, without any doubt, what information is being requested and whether it is public or reserved, in accordance with the exceptions to disclosure established in this policy. CABEL shall not require the submission of explanations or evidence of interest to support the request for information.

Article 20. The term for resolving requests for access to information shall be thirty (30) calendar days. If said term is not sufficient, the applicant shall be notified of such situation and an estimated date of response shall be indicated.

Article 21. When responding to requests for information, CABEL shall determine whether it is possible to provide the information, taking into consideration whether the information is public, in view of the fact that it is not protected by the exceptions established in these regulations. When there are doubts about how to respond to a request and the classification of the information required, the Communications and Access to Information Committee, the highest authority in the interpretation of this policy, may be consulted through the Access to Information Unit.

Article 22. CABEL reserves the right to preliminarily dismiss unreasonable or generic requests. Such requests include:

- (a) Those that do not allow individualizing the information with the description contained in the request.
- (b) Those that refer to information that is not in the Bank's possession.
- (c) Those that have been received in a repetitive manner or when their nature is identified as malicious or commercial.
- (d) Those that imply the elaboration, systematization or compilation of information in non-existent dashboards or that is not available in the Administration of information applications, among others of the same nature that involve the creation of information.

Article 23. For those requests for information that involve the search for non-digitized information or that represent an exceptionally high investment of resources, among other factors that increase the complexity of the search, the Bank will notify the requester that the term for response may be extended.

B. REVIEW MECHANISM

Article 24. The requesting party that considers that the denial of information is contrary to policy will have access to a review mechanism, which will consist of two instances:

- (a) **First instance before the Communications and Access to Information Committee.** The requesting party shall have a term of up to 30 calendar days to file a request for review with the Communications and Access to Information Committee. In accordance with the policy and its exceptions to disclosure, the Committee shall decide whether to: (i) uphold the initial decision to deny access to the information or (ii) reverse the initial decision and allow access to the information. The decision of this Committee shall be public and reasoned. The Committee shall have a maximum term of 30 calendar days to adopt a decision, which shall be public and reasoned.
- (b) **Second instance before the Board of Directors of the Bank.** In the event that the Communications and Access to Information Committee upholds the decision to deny access to information, the requesting party may file an appeal to the Board of Directors within a term of up to 30 calendar days following receipt of the respective notice. In accordance with the policy and its exceptions to disclosure, the Board of Directors shall decide whether to: (i) uphold the decision to deny access to the information or (ii) reverse the Committee's decision and allow access to the information. The Board of Directors' decision shall have a maximum term of 30 calendar days to reach a decision and shall be public, reasoned and final.

REQUIREMENTS OF PUBLIC ENTITIES

Article 25. The Communications and Access to Information Committee must know, analyze and, if deemed convenient, authorize the response to all requests for information of any nature that have been presented to CABEI through judicial orders, requests from external control entities, autonomous bodies in charge of criminal prosecution or similar instances. The Committee shall be empowered to authorize or deny requests for information presented by public entities based on the immunities conferred by the Constitutive Agreement.

REPORT AND REVIEW

Article 26. Annually, the Communications and Access to information Committee shall present to the Board of Directors a report that includes at least the following:

- (a) Lessons learned on the implementation and execution of the policy.
- (b) Recommendations for improvements, new practices and technologies available for the classification and disclosure of information assets.
- (c) Effectiveness of the mechanisms aimed at maximizing access to information, indicating, for each annual exercise, the number of requests for access received and for review, specifying the category of information in each one and the reason for the denial of access, among other key information.

Annex 1: Documents to be proactively disclosed in the operations cycle

1. Private Sector ²

A. Prior to approval

- (1) Investment summary.
- (2) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) Plan, ex-ante³.

B. Subsequent to approval

- (1) Update of the investment summary.
- (2) Public resolution of the Board of Directors.
- (3) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) Plan, monitoring .
- (4) Oversight summary.
- (5) Summary on closure of the operation with a focus on development impact.

2. Public Sector without Sovereign Guarantee ⁴

A. Prior to approval

- (1) Operation profile.
- (2) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) Plan, ex ante.⁵.

B. Subsequent to approval

- (1) Public summary of the credit report that will be disclosed once the contract has been signed.
- (2) Public resolution of the Board of Directors.

² The client will have the opportunity to make a factual review of the content of the documents prior to disclosure within a term of five (5) business days and, if no response is received, the disclosure will proceed.

³ In accordance with the Access to Information Policy, disclosure of environmental and social information will be consistent with CABEL's Environmental and Social Policy and its regulatory framework.

⁴ The client will have the opportunity to make a factual review of the content of the documents prior to disclosure within a term of five (5) business days and, if no response is received, the disclosure will proceed.

⁵ Ibid.

- (3) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) plan, monitoring and evaluation.⁶
- (4) Supervision reports.
- (5) Report of closing of the operation.

3. Public Sector with Sovereign Guarantee

3.1 Projects

A. Prior to approval

- (1) Operation profile.
- (2) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) Plan, ex ante.⁷

B. Subsequent to approval

- (1) Credit Report (public version) and Annexes.
- (2) Loan agreement.
- (3) Project file.
- (4) Public resolution of the Board of Directors.

C. Implementation

- (1) Any modification to the contract.
- (2) Environmental and Social Risk Identification, Evaluation and Mitigation System (SIEMAS) plan, monitoring and evaluation⁸.
- (3) Annual procurement plan.
- (4) Specific procurement notices.
- (5) Bidding/competition process base documents.
- (6) Annual audited financial statements.

⁶ In accordance with the Access to Information Policy, disclosure of environmental and social information will be consistent with CABEL's Environmental and Social Policy and its regulatory framework.

⁷ In accordance with the Access to Information Policy, disclosure of environmental and social information will be consistent with CABEL's Environmental and Social Policy and its regulatory framework.

⁸ Ibid.

- (7) Supervision reports.
- (8) RSO Monitoring Report (Annual).

D. Closure

- (1) Operation closing report.
- (2) Ex post evaluation report.

3.2 Technical cooperation

A. Prior to approval

- (1) Technical cooperation profile.

B. Subsequent to approval

- (1) Technical Cooperation Approval Report (public version).
- (2) Technical cooperation form.
- (3) Public resolution of the Board of Directors or the Executive President.

C. Implementation

- (1) Annual Procurement Plan.
- (2) Specific procurement notices.
- (3) Base documents for bidding/competition processes.

D. Closure

- (1) Closing report.

3.3 Emergency assistance

A. Post-approval

- (1) Report of approval of the Emergency Aid (public version).
- (2) Public resolution of the Board of Directors.

B. Closure

- (1) Report submitted by the beneficiary.