

## Disclosure

The below text sets out the policy of the Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V. (FMO) regarding the scope of information that it routinely discloses to the public (referred to below as FMO's Disclosure Policy or Policy). This Policy has been approved by the Management Board and is effective as of January 1, 2013, and has been partially revised as of 1 January 2016 in connection with IATI (see below), and on January 1 2018 regarding the extension to E&S categories B and C. It may be further revised as deemed necessary by the FMO Management Board.

### Policy Background

FMO believes that transparency on our financing and investments are fundamental to fulfilling our development mandate. Therefore, FMO has adopted a disclosure policy outlining the scope and type of information that it makes available to the public. This policy does not provide any contractual or other rights to any party. Our disclosure policy will apply to projects related to Government funds (MASSIF, IDF, AEF, IDF, FOM-OS) agreed from January 1, 2012 and onwards and to all financing and investments agreed from January 1, 2013 and onwards. Next to the disclosure of the annual reports, press releases and corporate and policy related disclosure, it will disclose information about its investments and financing. In its implementation of the Policy, FMO may be dependent upon cooperation by third parties.

### Information routinely to be made available by FMO on the website

#### *Institutional/Corporate information*

FMO posts on its website an organogram of FMO identifying the various departments and components of the institution. FMO also publishes the Articles of Association, the Standing Rules of the Management Board, the Standing Rules of the Supervisory Board and its committees (ARC and SARC), the Profile of the Supervisory Board, the Whistle Blowers Scheme, the Regulation on Private Investments and the minutes of the Annual General Meeting (AGM).

#### *Investment related information*

FMO will inform the public about projects through project disclosure documents and so-called IATI reporting (see below). FMO intends to disclose the following details of transactions:

- Client name
- Client's website (if available)
- Origin (Region and Country)
- Sector
- Signing date (Date of the main transaction document)
- Total FMO Financing (Size of FMO's share in deals in EUR/USD)
- Fund (FMO-A/IDF/MASSIF/AEF/CD)
- Environmental & Social Category (A, B+, B, C)
  - Project Description, including but not limited to:
    - Who is our Client?
    - What is the funding objective (type of activity)?
    - Why do we fund this project?

For projects disclosed through IATI: to be supplemented with IATI additional categories where applicable (see below).

*FMO's Disclosure Policy defines the following procedures for making the information available to the public:*

- Disclosure of project-related information will be made following the signing of the legal agreements with the respective client. (For projects disclosed through IATI: FMO aims to update disclosure information on a quarterly basis (where applicable, see below))
- Information will be archived after one year and will remain available (i) on the FMO website until the end of FMO's financial exposure, and (ii) for projects disclosed through IATI: on FMO's IATI website and in electronic format (XML) connected to the IATI Registry.

The project-related information is prepared by FMO to disclose a factual summary of the main elements of the financing or investment upon and after entering into such financing or investment. The project information on FMO's website and (where applicable) in electronic format (XML) connected to IATI Registry is a summary only and does not purport to be comprehensive, complete, conclusive or up to date. FMO considers that the project information is of adequate quality for release to the public, but it has not necessarily independently verified all of the information therein.

### **International Aid Transparency Initiative (IATI) Disclosure process for projects related to Government funds**

As of 1 January 2016, FMO intends to report all projects related to Government Funds through the IATI standard.

IATI is a voluntary, multi-stakeholder initiative that seeks to improve the transparency of aid, development, and humanitarian resources in order to increase their effectiveness in tackling poverty. By implementing IATI and providing additional information for projects related to Government funds, FMO supports the Dutch government's efforts of creating accountability and transparency of its funding managed by FMO.

IATI disclosure will be done via FMO's IATI website and in electronic format (XML) connected to the IATI Registry. This information will be updated, if necessary, on a quarterly basis. IATI covers the investment related information noted above, as well as the following details of transactions:

- date and amount of disbursements by FMO (updated on a quarterly basis)
- date of final disbursement by FMO
- full repayment date (for debt)

### **Early disclosure of potential investments**

As per January 2017, FMO started to disclose new debt, equity and guarantee transactions of the Environmental and Social risk (E&S risk) category A and B+ before contracting. As per January 2018, FMO extended early disclosure to E&S risk categories B and C. This also includes Government Funds, when FMO is in the lead and when we follow a partner. This applies to FMO's whole product range, including Financial Institutions-trade finance, Private Equity-funds, convertible grants administered as a debt or equity, repeat transactions and loans with a new purpose.

Transactions that will not be ex ante disclosed are:

- Increases in existing capital to prevent dilution
- Rescue finance, unless the financing is done to start new activities.
- Transactions with listed companies/groups
- Capacity Development transactions

Furthermore, FMO's early disclosure policy allows for a waiver for early disclosure to be granted by FMO's Management Board. These waivers are frequently granted for direct equity investments, where confidentiality and execution speed are market practice and ex ante disclosure is often not possible.

FMO will disclose after client approval of the disclosure text and after approval of the Finance Proposal. The contract can only be signed when text has been disclosed for a period of 30 calendar days. FMO will disclose information on the following items:

- Who is our client
- Funding objective
- Why we fund this potential project
- E&S categorization, rationale and a description of which IFC Performance Standards (PS) are triggered.
- For the PS's that are not triggered, an explanation will be included on the reason(s) why not.

FMO's whole product range will again be disclosed post contracting. This includes transactions that have not been disclosed prior to contracting.

Questions can be posted by email, through [disclosure@fmo.nl](mailto:disclosure@fmo.nl)