
SMBC Information Disclosure Policy for GCF Funding Projects/Programs

August 2024

Sustainability Planning Department

1. Objective and scope

- 1.1 **Sumitomo Mitsui Banking Corporation (SMBC)** recognizes the importance of and reaffirms its commitment to transparency and accountability in all aspects of its operations in performing its duties as an entity accredited (the Accredited Entity) by the Green Climate Fund (GCF). Through the implementation of this Information Disclosure Policy (this Policy), SMBC recognizes the need to ensure public access and stakeholder participation in fulfilling its role. SMBC will ensure the greatest degree of transparency in all its activities as the Accredited Entity in the projects and the programs which are or to be funded by the GCF (the GCF Projects/Programs) through the effective dissemination of information to stakeholders and the public at large.
- 1.2 The GCF requires the Accredited Entities that they operate in a transparent and accountable manner guided by the principles of efficiency and effectiveness.
- 1.3 This document sets out the SMBC's policy regarding the information that it makes available to the public as the Accredited Entity in the GCF Projects/Programs.
- 1.4 This Policy applies to all information produced by or in the possession of SMBC as the Accredited Entity in the GCF Projects/Programs.

2. Definitions

- 2.1 For the purposes of this Policy, the following terms shall have the meaning set out below:
- (a) Accredited Entity means the entity accredited by the GCF;
 - (b) SMBC means Sumitomo Mitsui Banking Corporation;
 - (c) ESIA means the “Environmental and Social Impacts Assessment” which is a comprehensive document of a project's potential environmental and social risks and impacts which is developed based on key process elements generally consisting of (i) initial screening of the project and scoping of the assessment process; (ii) examination of alternatives; (iii) stakeholder identification (focusing on those directly affected and other stakeholders) and gathering of environmental and social baseline data; (iv) impact identification, prediction, and analysis; (v) generation of mitigation or management measures and actions; (vi) significance of impacts and evaluation of residual impacts; (vii) consultation with and disclosure to project affected people including setting up a grievance mechanism; and (viii) and documenting the assessment process in form of an ESIA report;
 - (d) ESMP means the “Environmental and Social Management Plan” which is a document prepared either as part of an ESIA or as a separate document accompanying the ESIA describing the process of management of the mitigation measures and actions identified in the ESIA study including the associated responsibility, timeline, costs, and monitoring of key environmental and social indicators, described in the ESMP;
 - (e) ESMS means the “Environmental and Social Management System” which is a collection of policies, management processes and procedures that allow analysis, control and reduction of the environmental and social impacts;

- (f) GCF means the Green Climate Fund;
- (g) GCF Projects/Programs means the projects and the programs which are or to be funded by the GCF; and
- (h) Policy means this Information Disclosure Policy.

3. Principles

3.1 This Policy is based on the following principles:

- (a) Principle 1: Maximize access to information. SMBC reaffirms its commitment to transparency in all of its activities as the Accredited Entity and therefore seeks to maximize access to any documents and information that it produces and to information in its possession that is not on the list of exceptions as set out in Chapter 5 of this Policy.
- (b) Principle 2: Limited exceptions. Any exceptions to disclosure will be permitted only in case that the potential harm to interests, entities or parties arising from the disclosure of information would outweigh the benefits of access, and that SMBC is legally obligated to non-disclosure or has received information from third parties indicated as confidential. In addition, SMBC may, in exceptional circumstances, decide not to disclose or delay dissemination of information that would normally be accessible if it determines that the harm that might occur by doing so will outweigh the benefits of access.
- (c) Principle 3: Simple and broad access to information. SMBC will employ all practical means to facilitate access to information and maximize access to such information.

4. Standard of disclosure

4.1 SMBC seeks to maximize access to information that it produces and/or possesses and will therefore disclose any information not contained in the list of exceptions set out in Chapter 5 of this Policy. This Policy is predicated not on a list of information that it chooses to disclose but rather on a clear description of the information that it will not disclose. SMBC will apply a presumption in favour of disclosure for all information and documents relating to its activities as the Accredited Entity in the GCF Projects/Programs. All documents in SMBC's possession subject to disclosure as per this Policy, will be released on SMBC's website or through other appropriate means.

4.2 As a matter of principle, SMBC will share the majority of the information in its possession with stakeholders and the public at large subject to specified exceptions to presumed disclosure. The timing of disclosure of the different types of information may vary, based on the nature of the information as further set out in Chapter 7 of this Policy.

5. Exceptions to presumed disclosure

5.1 While SMBC is committed to disclosing as much information as possible, the effective functioning of SMBC requires it to protect certain types of information by identifying the harm that disclosure of the relevant information could cause to the interests protected by the exceptions.

5.2 If a document (or part of it) subject to posting on SMBC's website is not posted because the information contained in the document falls under an exception, SMBC will make reference to the document or the information removed therefrom, unless citing the document or the removed information would itself violate an exception.

5.3 The exceptions to SMBC's presumption in favour of disclosure of information are set forth below. The following categories of information/documents will not be accessible because the potential harm caused by their disclosure outweighs the benefit to be derived from accessibility.

(a) Personal information.

SMBC will not disclose information relating to personal information of any person, including directors, staff, consultants, experts, attorneys, agents, contractors and other persons connected with SMBC;

(b) Legal, disciplinary or investigative matters.

(i) SMBC will not disclose information subject to legal professional privilege, matters in legal dispute or under negotiation, information relating to any investigation of alleged fraud, corruption or misconduct or disciplinary proceedings, except to the extent specifically permitted by and in accordance with SMBC's rules on such investigations, or any information that, if disclosed, would or would be likely to materially prejudice an investigation or the administration of justice or violate applicable law;

(ii) SMBC will not disclose information, documents, reports or communications in circumstances where disclosure would violate applicable law or contractual obligations, or could subject SMBC to undue litigation risk; and

(iii) SMBC will not provide access to or release information relating to proceedings of internal grievance mechanisms except to the extent expressly permitted under the rules of these mechanisms;

(c) Internal communications/documents. SMBC will not disclose any internal communications and documents, including those with its consultants, attorneys, agents or contractors;

(d) Safety and security. SMBC will not disclose information that would or would be likely to compromise the security, safety or health of SMBC staff and their families, consultants, experts and contractors, any other individual or SMBC and their assets;

(e) Information provided in confidence.

(i) Information provided to SMBC in confidence or with restrictions on disclosure, will not be disclosed without the explicit authorization of the provider of such information, such as information covered by a confidentiality agreement or non-disclosure agreement that SMBC had entered into with other parties;

(ii) Financial, business or proprietary and non-public information in possession of SMBC and belonging to a party outside SMBC will not be disclosed, without the express permission of such a party; and

(iii) SMBC will not disclose information provided to it in confidence, alleging fraud, corruption,

or violation of any of SMBC's policies, or misconduct, except to the extent specifically permitted by and in accordance with the applicable rules on investigations, as well as the identity of the party making the allegation, unless such a person consents to the disclosure of his or her identity;

- (f) Deliberative information. Deliberative information exchanged, prepared for or derived from the exchanges between SMBC and the GCF or other Accredited Entities or third parties as well as information pertaining to SMBC's own internal deliberative processes, will not be disclosed. Therefore; while it will, subject to the exceptions set out in Chapter 5 of this Policy, make public the agreements or decisions reached at the conclusion of such a deliberative process, it will not provide access to the following information:
- (i) Information (including e-mails, notes, letters, memoranda, reports or other documents) prepared for or exchanged during the course of its deliberations with the GCF, other Accredited Entities, countries, other entities or persons with whom SMBC is involved;
 - (ii) Information (including e-mails, notes, letters, memoranda, reports or other documents) prepared for or exchanged during the course of its own internal deliberations, including those issued or prepared by SMBC's staff, consultants, experts, attorneys, agents or contractors; and
 - (iii) Studies, audit reports, assessments, evaluations or analyses prepared by or on behalf of SMBC's staff, consultants, experts, attorneys, agents or contractors to inform the SMBC's internal decision-making and assessment processes that include sensitive information;
- (g) Certain financial information. SMBC will not provide access to any financial information that, if disclosed, would prejudice the financial or commercial interests of SMBC and any of its activities;
- (h) GCF requests. SMBC will not disclose information if so requested by the GCF; and
- (i) Internal rules. SMBC will not disclose information in circumstances where disclosure would violate other internal rules of SMBC.

6. Language of Disclosure

6.1 Documents will be disclosed in Japanese; provided that the reports referred to in paragraph 7.3 below and any documents SMBC discloses that it considers to be of significant public interest will be published in English and, if applicable, the local language on SMBC's website.

7. Implementation aspects of this Policy

7.1 SMBC's website. SMBC routinely discloses a wide range of information and documents including GCF relevant policies and procurement contract awards under GCF-funded activities through its website. These include, but are not limited to, decisions of SMBC and project-related public information that provides details on all types of the GCF Projects/Programs. Other means of dissemination will be used by SMBC as may be required to reach its intended audiences.

7.2 GCF Projects/Programs proposals. GCF Projects/Programs proposals will be disclosed simultaneously with the disclosure by the GCF, subject to the redaction of any information which may not be disclosed pursuant to this Policy. Public disclosure shall be accomplished via posting on the SMBC's website.

7.3 Environmental and social reports. With respect to the GCF Projects/Programs proposals that have an environmental or social impact, SMBC shall disclose and announce to the public:

(a) in case of Category A projects, the ESIA and an ESMP at least 120 days in advance of SMBC's decision or GCF's Board decision, whichever is earlier;

(b) in the case of Category I-1 programs, the ESMS at least 120 days in advance of the SMBC's decision or GCF's Board decision, whichever is earlier;

(c) in the case of Category B projects, the ESIA and an ESMP at least 30 days in advance of the SMBC's decision or GCF's Board decision, whichever is earlier; and

(d) in the case of Category I-2 programs, the ESMS at least 30 days in advance of the SMBC's decision or GCF's Board decision, whichever is earlier.

The reports will be available in both English and the local language (if not English) simultaneously. The reports will be available via the SMBC's website. GCF Projects/Programs proposals that do not have any significant environmental or social impact (i.e. Category C project or Category I-3) shall not require any additional advance information disclosure.

8. Effective date

8.1 The provisions of this Policy will take effect on [month] [day] 2020.

9. Miscellaneous

9.1 Information disclosed under this Policy is provided as is; provided that SMBC will take all reasonable steps to conspicuously disclaim any loss or liability, either directly or indirectly as a consequence of using the disclosed information.

9.2 This Policy shall not be interpreted to affect or alter existing internal rules of SMBC and shall only apply to the GCF Projects/Programs in which SMBC participates as the Accredited Entity.