

PUBLIC

**DOCUMENT OF THE EUROPEAN BANK
FOR RECONSTRUCTION AND DEVELOPMENT**

**PUBLIC INFORMATION POLICY
REPORT ON IMPLEMENTATION 2014**

PUBLIC

PUBLIC INFORMATION POLICY REPORT ON IMPLEMENTATION 2014

EXECUTIVE SUMMARY	2
IMPLEMENTATION RECORD: 1 JANUARY 2014 – 31 DECEMBER 2014	4
1. INSTITUTIONAL INFORMATION	4
1.1 SCHEDULE OF FORTHCOMING BOARD DISCUSSIONS	4
1.2 LIST OF FORTHCOMING STRATEGY AND POLICY REVIEWS AND UPDATES	4
1.3 BOARD MINUTES	4
1.4 BOARD COMMITTEES	5
1.5 ORGANIGRAM OF THE BANK	5
1.6 SALARIES OF SENIOR MANAGEMENT AND DIRECTORS	5
1.7 ADMINISTRATIVE TRIBUNAL	6
2. INFORMATION ON STRATEGIES AND POLICIES	6
2.1 COUNTRY STRATEGIES	6
2.2 SECTOR STRATEGIES AND POLICIES	11
2.3 GOVERNANCE POLICIES SUBJECT TO PUBLIC REVIEW	12
2.4 DISCLOSURE OF OTHER STRATEGIES AND INSTITUTIONAL REVIEWS	14
2.5 ON-LINE ARCHIVE OF EARLIER STRATEGIES AND POLICIES	14
3. PROJECT-RELATED INFORMATION	14
3.1 PROJECT SUMMARY DOCUMENTS (PSDs)	15
3.2 PUBLIC SECTOR PROJECTS	18
3.3 CANCELLED, REJECTED OR INACTIVE PROJECTS	18
3.4 ENVIRONMENTAL AND SOCIAL INFORMATION RELATING TO PROJECTS	18
3.5 AGGREGATE INFORMATION ON TRANSITION IMPACT	22
4. ACCOUNTABILITY AND GOVERNANCE RELATED INFORMATION	22
4.1 COMPLIANCE DOCUMENTATION	22
4.2 EVALUATION DOCUMENTATION	26
4.3 OTHER DOCUMENTATION	27
5. INFORMATION CONSIDERED CONFIDENTIAL (SECTION E OF THE PIP)	29
6. IMPLEMENTATION AND MONITORING OF THE PUBLIC INFORMATION POLICY (SECTION F OF THE PIP)	29
7. IMPLEMENTING PROCEDURAL PROVISIONS FOR INFORMATION REQUESTS AND APPEALS (ANNEX TO THE PIP)	31

PUBLIC INFORMATION POLICY REPORT ON IMPLEMENTATION 2014

EXECUTIVE SUMMARY

The Public Information Policy (PIP) establishes how the EBRD discloses information and consults with its stakeholders so as to promote better awareness and understanding of its strategies, policies and operations. The PIP commits the Bank's management to report annually to the Board of Directors on implementation of the PIP, with the findings to be posted on the Bank's website. This implementation report covers the period from 1 January to 31 December 2014.

In 2014, the Bank was in compliance with most PIP requirements:

Institutional information

- This was posted on the web as required.

Strategies and policies

- Public consultation was conducted on six Country Strategy reviews and one sectoral strategy.

Project related information

- One hundred and forty five private sector Project Summary Documents (PSDs) were posted on the web. With one exception, all PSDs were PIP compliant (see p. 16).

Translations into official national languages

- Approved Country Strategies and PSDs were translated as required. The posting of some translated Country Strategies took longer in some cases due to administrative and technical issues in the translation process. While most translated PSDs were posted in a timely fashion, there were some minor delays

Environmental and social information

- Environmental and Social Impact Assessments (ESIAs) on all "Category A" projects that proceeded to Board approval in 2014 were made available in a local language and for the required number of days.

Accountability and governance information

- This was posted as required.

Requests for information

- The Bank responded in a timely fashion to requests for information. There was one appeal against a decision regarding refusal of a request for information that the Bank was unable to release.

IMPLEMENTATION RECORD: 1 JANUARY 2014 – 31 DECEMBER 2014

Each PIP obligation and report on its implementation is addressed below, in the order in which these appear in the EBRD's Public Information Policy.

1. INSTITUTIONAL INFORMATION

1.1 Schedule of forthcoming Board discussions

PIP requirements:

“The Bank will post in a dedicated website location the schedule for Board discussions of forthcoming Country Strategies, Sector Strategies and Policies, and projects. The projects scheduled for discussion will have a link to the Project Summary Documents already posted on the web. The schedule will be updated on a monthly basis. It should be noted that the precise scheduling of individual items can change.”

Implementation:

The schedule of Board discussions of forthcoming Country and Sector Strategies and projects was updated on the Bank's website throughout 2014 on a monthly basis. In addition, specific information was provided on the items to be discussed at each of the next two Board meetings.

1.2 List of forthcoming strategy and policy reviews and updates

PIP requirements:

“The Bank will post on its website a list of impending reviews in order to give adequate advance warning of the posting of draft reviews and updates.”

Implementation:

Three governance policies, the 2008 Environmental and Social Policy (ESP), the 2011 Public Information Policy (PIP) and the 2009 Project Complaint Mechanism Rules of Procedure (PCM RP) were subject to public review and comment in 2014. A Stakeholder Engagement Plan was prepared for each policy and released on the Bank's website to clarify the review process and the opportunities for public comment.

1.3 Board minutes

PIP requirements:

“The Bank will release Minutes of meetings of the Board of Directors which will contain the following: (i) the names of attendees; (ii) a record of the approval of the Minutes of the previous meeting; (iii) titles of the agenda items; and (iv) agreements and decisions reached.”

Implementation:

The minutes of the 24 Board Meetings held in 2014 were posted on the website following approval of these minutes by the Board. These minutes were for the meetings held on the following dates: 15, 29 and 31 January; 12, 26 and 28 February; 12 and 26 March; 1 April; 7 and 28 May; 11 and 25 June; 9 and 23 July; 3 and 17 September; 1, 15 and 29 October; 11 and 26 November; 10 and 17 December.

1.4 Board Committees

PIP requirements:

“The Terms of Reference and membership of the Committees of the Board of Directors will be posted on the website.”

Implementation:

The Terms of Reference and membership of Committees of the Board of Directors were posted on the website soon after the annual approval by the Board on 23 July 2014 of the new composition of the Committees.

1.5 Organigram of the Bank

PIP requirements:

“The Bank will post on its website an organigram of the EBRD identifying the various departments and component parts of the institution.”

Implementation:

Throughout the year the Bank updated the departmental organigrams and administrative structures posted on the website.

1.6 Salaries of senior management and Directors

PIP requirements:

“The Bank will disclose the salaries of the Presidents, Vice Presidents, the Board of Directors and the range of salaries for senior management in the Bank’s Annual Financial Report.”

Implementation:

This information was contained in the 2013 Bank Annual Financial Report, which was posted on the website in May 2014.

1.7 Administrative Tribunal

PIP requirements:

“The Bank will post on its website details of the Bank’s Administrative Tribunal as well as copies of its decisions.”

Implementation:

Information on the Administrative Tribunal was posted on the Bank’s website and updated as required.

2. INFORMATION ON STRATEGIES AND POLICIES

2.1 Country strategies

The Bank develops Country Strategies for its activities in each country of operations. The object of the Country Strategies is to provide guidance and a set of parameters for EBRD activities including banking operations, technical assistance and policy dialogue in the relevant country.

PIP requirements:

“The Bank will invite the public to provide input to the preparation of Country Strategies on the basis of a draft Country Strategy document. Whenever appropriate, the Bank will proactively engage with civil society representatives and members of the public at an early stage of Country Strategy development through consultation workshops as well as other means.

The draft Country Strategy will be publicly released and posted on the Bank’s website, following a process which includes consultation with the authorities of the country concerned. The draft Country Strategy will be posted for a period of 45 calendar days, during which time the public is invited to send comments to the Bank.

A summary of public comments received will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board of the Country Strategy.”

Implementation:

In the period under review, six draft Country Strategies were posted for comment on the Bank’s website as required by the PIP (see Table 1). For each of these strategies, a summary of public comments received was made available to the Board of Directors prior to final Board approval of the Country Strategy concerned.

Table 1: Draft Country Strategies posted for public comment in 2014

Country	Date posted on website
Azerbaijan	27 February 2014
Jordan	25 July 2014
Kyrgyz Republic	12 December 2014*
Moldova	21 February 2014
Morocco	05 December 2014*
Serbia	30 January 2014

*Details will be included in 2015 report, following approval.

Draft Country Strategies consulted on and approved in 2014

Azerbaijan

Following the disclosure of the draft Strategy for public comments, the EBRD Resident Office in Baku hosted two consultation workshops with civil society representatives on 3 and 4 April 2014. The workshops aimed to proactively solicit inputs on the draft Strategy and the Bank's operational priorities in the forthcoming Strategy period from local civil society organisations (CSOs). The events attracted 11 representatives of local CSOs, working on the issues of human rights and democracy and business development.

The Strategy was approved by the Board of Directors on 30 April 2014. The *Report on the Invitation to Comment*, which captures the key themes and views received during the consultation process, became an addendum to the Strategy and can be found on <http://www.ebrd.com/downloads/country/strategy/azerbaijan-comments.pdf>

Jordan

The EBRD organised a consultative meeting in Amman to discuss current and prospective activities of the Bank in the country with CSOs. Twenty participants, from 11 civil society organisations, attended the event together with two observers respectively from the United Nations Office for Project Services and an international consultant working on civil society issues within the Ministry of Social Development.

The Strategy was approved by the Board of Directors on 1 October 2014. The *Report on the Invitation to Comment*, which captures the key themes and views received during the consultation process, became an addendum to the Strategy and can be found on <http://www.ebrd.com/what-we-do/strategies-and-policies.html>

Moldova

During the Strategy drafting process prior to the disclosure of the draft Strategy for public comments, the EBRD President met with representatives of local CSOs in Moldova on 7 February 2014 to discuss political and economic developments in Moldova, and to exchange views about planned priorities during the forthcoming Strategy period. Representatives from Transparency International, the Association for Participatory Democracy, the Institute for Public Policy and the East Europe Foundation were present at the meeting. The topics which were addressed included the improvement of business climate and the fight against corruption, particularly in the judiciary.

The Strategy was approved by the Board of Directors on 3 April 2014. No written comments on the draft country Strategy for Moldova were received and no *Report on the Invitation to Comment* prepared but details of the consultation can be found at:

<http://www.ebrd.com/downloads/country/strategy/moldova-comments.pdf>

Serbia

The EBRD organised a consultation workshop with CSOs on 7 November 2013 in Belgrade to gather feedback during the preparatory phase leading to the draft strategy. The meeting attracted 30 participants from 22 CSOs working on democracy and human rights; transparency and accountability; environmental issues; community development and support to entrepreneurship.

The Strategy was approved by the Board of Directors on 8 April 2014. As no written comments were received during the public consultation period, the *Report on the Invitation to Comment* includes comments received in oral format at the consultation workshops held during the preparatory works on the new Strategy.

http://www.ebrd.com/downloads/country/strategy/serbia_comments.pdf

Draft strategies consulted on during 2013 but approved in 2014

Bosnia and Herzegovina

A delegation of the EBRD Board Directors met with representatives of CSOs on 18 March 2013 to gather civil society's feedback on socio-economic, good governance and environmental challenges in the country. The EBRD Resident Office hosted a workshop with CSOs on 6 November 2013 in Sarajevo to discuss and solicit comments on the draft Strategy. The event attracted 22 participants from 16 CSOs and one consulting company.

The Strategy was approved by the Board of Directors on 21 January 2014. The *Report on the Invitation to Comment*, which captures the key themes

and views received during the consultation process, became an addendum to the Strategy and can be found on:

<http://www.ebrd.com/downloads/country/strategy/bosnia2014-comments.pdf>

Slovenia

The EBRD met with CSOs on 17 September 2013 in Ljubljana to gather civil society's feedback during the preparatory phase leading to the draft strategy. The meeting attracted 22 participants from 15 civil society organisations working on topics spanning environmental protection to transparency, and from public-private-partnerships to social entrepreneurship. A delegation of EBRD Board Directors met with representatives of CSOs to hear their views on socio-economic and environmental challenges in Slovenia.

As no written comments were received during the public consultation period, the report includes comments received in oral format at the consultation workshops held during the preparatory works on the new Strategy.

The Strategy was approved by the Board of Directors on 26 February 2014. The *Report on the Invitation to Comment*, which captures the key themes and views received during the consultation process, became an addendum to the Strategy and can be found on:

<http://www.ebrd.com/downloads/country/strategy/slovenia-comments.pdf>

Turkmenistan

In advance of the Strategy drafting process, a delegation of the Board of Directors met with representatives of local organisations in Ashgabat to exchange views about the Bank's work in the country and planned priorities for the next Strategy period. Following the disclosure of the draft Strategy for public comments, the EBRD hosted two consultation workshops with civil society in September 2013.

The Strategy was approved by the Board of Directors on 30 April 2014. The *Report on the Invitation to Comment*, which captures the key themes and views received during the consultation process, became an addendum to the Strategy and can be found on

http://www.ebrd.com/downloads/country/strategy/turkmen_comment.pdf

Translation of Draft Country Strategies

“The Bank will translate each draft Country Strategy into the relevant official national language. In those countries where there is more than one official national language, and where one of those languages is a designated working language of the Bank, the translation will be provided only in such working language. Translated draft Country Strategies will not be considered official Bank documents as they are prepared only for the convenience of local communities and other interested parties. While the Bank cannot guarantee the accuracy and authenticity of any such translation, which will carry a disclaimer,

every effort will be made to provide reliable translations. The translated draft Country Strategies will be made available in the relevant Resident Office and posted on the Bank's website.

The translation of the draft Country Strategies into the relevant national language is not intended, and should not be seen, in any way to modify, alter or impact upon the Bank's practice of working in the following four languages: English, French, German and Russian."

Implementation:

During 2014, all draft Country Strategies were translated into the relevant official national language.

Final Country Strategies and Translation of Approved Country Strategies

PIP requirements:

"After the Country Strategy has been approved, the Report on the Invitation to Comment, containing the summary of public comments received and staff responses will be publicly released on the Bank's website. While all comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not normally respond to individual public comments or communications received."

"The Bank will translate each approved Country Strategy and the Report on the Invitation to Comment into the relevant official national language subject to the same terms set out in Section 2.1.2 above."

Implementation:

In the period under review, the Country Strategies approved by the Board in 2014 were posted on the website as required by the PIP (see Table 2), along with the corresponding reports on public comments received. In line with the Policy, a timetable for Strategy reviews in 2014 was also posted on the website at the beginning of the year and updated as appropriate.

The approved Country Strategies were translated into relevant official national languages.

At the time of the posting of the approved Strategies, the Civil Society Engagement Unit alerted CSOs in the relevant country, as well as all other CSOs in the Bank's database, to the fact.

Table 2: Approved Country Strategies posted on the website in 2014

Country	Date approved	Posted on website
Azerbaijan	30 April 2014	12 May 2014
Bosnia and Herzegovina	15 January 2014	21 January 2014
Jordan	01 October 2014	02 October 2014
Moldova	30 April 2014	12 May 2014
Serbia	08 April 2014	15 April 2014
Slovenia	26 February 2014	28 February 2014
Turkmenistan	07 May 2014	03 September 2014

2.2 Sector strategies and policies

The Bank develops Sector Strategies or Policies for its operations in the key business sectors in which it promotes transition. The objective of the Sector Strategies and Policies is to provide guidance and a set of parameters for banking operations in the relevant sectors. As appropriate, environmental, and social information as well as gender considerations are included in summary format in such Strategies and Policies.

Draft Sector Strategies and Policies

PIP requirements:

“The Bank will invite the public to provide input to the preparation of Sector Strategies and Policies on the basis of a draft Sector documents. In addition, the Bank’s Environmental and Social Advisory Council is given the opportunity to comment on these draft documents.

Generally, sector level consultations with civil society representatives will be done in the context of Country Strategies. However in some selected cases, where appropriate, such consultations will be conducted for Sector Strategies and Policies as well.

The draft Sector documents will be publicly released on the Bank’s website for a period of 45 calendar days, during which time the public is invited to send comments to the Bank.

A summary of public comments received and staff responses will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board of the Sector Strategy or Policy.”

Implementation:

The draft *Information and Communication Technologies Sector Strategy* was posted on the EBRD website for 45 days from 9 January 2014. Comments were

received only from an ICT consultant, all of which were of an editorial nature and were incorporated as considered appropriate. A separate report detailing the Bank's response to the comments was not, therefore, prepared.

Final Sector Strategies and Policies

PIP requirements:

“After the Sector Strategy or Policy has been approved, the Report on the Invitation to Comment, containing the summary of public comments received and staff responses will be publicly released and posted on the Bank's website. While all comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not normally respond to individual public comments or communications received. The Bank reserves the right to acknowledge the receipt of petitions and e-mail chains collectively to the main author, rather than individually.

The following Sector Strategies and Policies currently provide guidance for the Bank's operations in the relevant sectors:

- *Transport Sector Strategy*
- *Property Sector Strategy*
- *Municipal and Environmental Infrastructure Sector Strategy*
- *Energy Sector Strategy*
- *Mining Operations Policy*
- *Information & Communication Technologies Sector Strategy*
- *Financial Sector Strategy*
- *Agribusiness Sector Strategy*

When additional Sector Strategies or Policies are developed the same treatment will apply for their release to the public.”

Implementation:

The Information and Communication Technologies Sector Strategy was approved by the Board on 12 March 2014 and posted on the Bank's website.

2.3 Governance policies subject to public review

PIP requirements:

“The Public Information Policy, Environmental and Social Policy, Evaluation Policy and the Project Complaint Mechanism are subject to periodic review. In the event of a revision, draft texts will be posted on the Bank's website for 45 calendar days for public comment. Whenever feasible, the Bank will seek public opinion at an early stage of policy development and will invite civil society and members of the public to provide comments and amendments to the current Policy through consultation workshops or other means. The Bank will take into account comments received when drafting the revised Policy. A summary of public comments received and staff responses will be made available to the Board of Directors in a Report on the Invitation to Comment before final approval by the Board.

Following approval by the Board of Directors, the Report on the Invitation to Comment, containing the summary of stakeholder comments received and staff responses will be publicly released and posted on the Bank's website, along with the final approved policy, incorporating any changes required by the Board of Directors. While all stakeholder comments received by the Bank during this exercise will be considered, and the senders acknowledged, the Bank will not normally respond to individual comments or communications received.

The above consultation procedure does not apply to any other of the Bank's policies.

The Bank will endeavour to provide translations of the Public Information Policy, the Environmental and Social Policy as well as its performance requirements, and the Project Complaint Mechanism, into a number of official national languages in the region on a demand-driven basis. Requests can be made for translations by clients, institutions, or civil society. While the Bank cannot guarantee the accuracy and authenticity of any such translation, which will carry a disclaimer, every effort will be made to provide reliable translations when need is demonstrated."

Implementation:

The ESP, PIP, and PCM released draft revised policies for public comment for a period of 45 days from 20 January 2014. Draft policies were disclosed in English, Russian, and French languages. The policies were further revised following public comment. The final policies were approved by the EBRD Board of Directors on 7 May 2014, along with each policy's report on comments received and Bank responses to the comments. The reports on comments and Bank responses were disclosed on the Bank's website in English following the Board meeting (<http://www.ebrd.com/cs/Satellite?c=Content&cid=1395241432782&d=Default&pagename=EBRD%2FContent%2FContentLayout>).

Translation of the Public Information Policy

The Bank has not received any requests for a translation into the relevant official language of any country of operations. However, a translation of the PIP has been made available in Russian on the Bank's website.

Translation of the Environmental and Social Policy

The 2014 Environmental and Social Policy (ESP) was translated in the second half of 2014 into 15 languages in addition to the approved English policy text. The translations underwent a quality review and were posted on the website, as this stage was completed. It will be translated into additional languages if need is demonstrated, and as resources and time permit. The priority for translation will take into account the requests of shareholders, clients, organisations, and the public.

Below are the currently available language versions of the 2014 Environmental and Social Policy:

- English
- Albanian
- Arabic
- Bosnian
- Bulgarian
- Croatian
- French
- Georgian
- Macedonian
- Mongolian
- Polish
- Romanian/Moldovan
- Russian
- Serbian
- Turkish
- Ukrainian

These translations are currently available on the Bank's website at <http://www.ebrd.com/cs/Satellite?c=Content&cid=1395238868749&d=Default&pagename=EBRD%2FContent%2FContentLayout>

2.4 Disclosure of other strategies and institutional reviews

PIP requirements:

“The Bank’s operations are guided by such documents as the five-yearly Capital Resources Review, the annual Medium Term Strategy Update, the annual Strategic Portfolio Review, and the annual Business Plan & Budget. Summaries of these documents will be made available on the Bank’s website after Board approval of the main document. In addition, a summary of approved annual Staff Compensation and Benefits adjustments will be included as part of the summary of the annual Business Plan & Budget to be made available on the Bank’s website.”

Implementation:

The annual Business Plan and Budget summary for 2014 was inadvertently not posted on the website. However, the website has now been updated with the Business Plan and Budget summary for 2015. From 2016, the annual Business Plan and Budget, together with elements of the former Medium Term Strategy Update and Strategic Portfolio Review, will be replaced by a three-year Strategy Implementation Plan. A summary of the document will be published.

2.5 On-line archive of earlier strategies and policies

“The Bank will post in a dedicated website location earlier approved versions of strategies and policies as set out in sub-sections 2.1, 2.2 and 2.3.”

Implementation:

The on-line archiving of strategies and policies is a continuing process.

3. PROJECT-RELATED INFORMATION

The Bank will inform the public of project development through Project Summary Documents. At the same time, project sponsors and clients entrust confidential

information to the Bank, which the Bank, as a financial institution promoting the development of the private sector, has an obligation to respect.

3.1 Project Summary Documents (PSDs)

PIP requirements:

“A Project Summary Document (PSD) will be prepared for each private and public sector project where approval is sought from the Board of Directors. PSDs provide a factual summary of the main elements of a given project and potential investment which includes the following information: (i) the identity of the project company; (ii) total project cost (where applicable); (iii) the project location; (iv) a brief description of the project and its objective; (v) the amount and nature of EBRD’s investment; (vi) the target date for a decision on the project by the Board of Directors; (vii) the anticipated transition impact, and for public sector projects, expected transition impact rating; (viii) a summary of environmental and social impacts associated with the project and agreed mitigation measures; (ix) if applicable, details of project related technical co-operation funding and grant financing; and (x) guidance on how and where information about the project can be obtained, including contact points for the project sponsor and the EBRD Operation Leader.

For projects where approval is not sought from the Board of Directors, but under delegated approval, a PSD will be prepared if there are significant environmental or social issues. For “Category A” projects approved under a Framework Project, either a separate PSD will be prepared, or the Framework PSD will be updated, to include summary information on the sub-project’s significant environmental or social issues and agreed mitigation measures.

For projects that are financed by special funds, relevant information will be posted on the fund web pages on the EBRD website.

Information considered confidential, as set out in Section E of the Policy, will be excluded from the PSD.

For private sector projects, the PSD will be released at least 30 calendar days prior to consideration of the project by the Board of Directors, unless the Bank’s client or co-financing institution provides sound reasons for not releasing the document. In such cases, the PSD will be released as soon as possible and prior to any disbursement.

For public sector projects, the PSD will be released as soon as possible after the project has passed its Concept Review by the Bank’s management, and at least 60 calendar days before Board consideration.

PSDs will be prepared for technical co-operation (TC) projects that are not related to a specific Bank financing, when these TC projects exceed EUR 300,000. The PSDs will be released upon internal approval of the TC projects.

PSDs are posted in three categories (date/country/sector) on the Bank’s website.

Deferrals of the release of PSDs may be granted in certain circumstances, for example:

- *Capital market transactions (e.g. IPO, listed company or bond issue) where security laws, Stock Exchange regulations or other bodies restrict or prohibit distribution of information as per the PSD.*
- *Legitimate sponsor concerns about confidentiality (as per Section E).*
- *Likelihood of substantial changes in project design at Final Review.*

PSDs will be updated, if material changes as approved by the Board, are made to the project following the release of the original PSD. For “Category A” projects, the environmental sections of the PSDs will be reviewed annually and updated as appropriate.

In order to make information available about the Bank’s operations in a given country, the PSD will, as soon as practicable after the posting of the English version, be translated into relevant official national language and publicly released and posted on the Bank’s website. Translated PSDs will also be made available in the relevant Resident Offices. While the Bank cannot guarantee the accuracy of such translation, every effort will be made to provide reliable translations. PSD updates will also be translated into the relevant official national language.”

Implementation:

In the period under review, 199 projects (145 private sector and 54 public sector) were prepared for Board consideration. With one exception, all PSDs were PIP compliant during the period under review.

The non-compliant PSD:

- Ukraine: NAK Naftogaz Emergency Pipeline Upgrade and Modernization – (public sector project) – was released 30 days before Board (rather than 60) based on the urgency of the sector reform agenda, which was supported by the Bank’s financing, and the target by all parties to sign the project agreements by the year end.

Table 3: PSDs published 1 January - 31 December 2014

PSDs for Private sector projects	Number
Compliant with policy	145
Non-compliant with PIP	0
Total number of private sector PSDs	145
Deferrals in accordance with PIP *	47
Capital markets transaction	31
Legitimate sponsor concerns on confidentiality	19
Likelihood of substantial changes at Final Review	4
PSDs for Public sector projects	
Compliant with policy	53
Non-compliant with PIP	1
Total number of public sector PSDs	54
Deferrals in accordance with PIP	2
Capital markets transaction	2
Legitimate sponsor concerns on confidentiality	0
Likelihood of substantial changes at Final Review	0

* Stated legitimate reasons for the deferrals exceed the number of actual deferrals because in a few cases there was more than one reason for the request.

Each PSD reflects the state of EBRD financing on a particular project at the time of Board approval of the project, other than material changes in the financial structure of the project as approved by the Board. PSDs are not designed to provide further information or updates on the subsequent development of a project and, therefore, do not necessarily provide an up-to-date reflection of the subsequent state of EBRD investments.

Of the 145 private sector PSDs, there were 47 deferrals to the 30-day release timeframe, all of which were authorised within the terms of the Policy.

Of the 54 public sector PSDs, there were 2 deferrals to the 30-day release timeframe, which was authorised within the terms of the Policy.

In the reporting period from 1 January - 31 December 2014, 159 PSDs were translated into the relevant official national languages¹. The following is the country breakdown:

Azerbaijan (3); Belarus (3); Bosnia & Herzegovina (2); Bulgaria (1); Croatia (9); Cyprus (1); Egypt (8); Estonia (1) FYR Macedonia (2); Georgia (5); Jordan (8); Kazakhstan (19); Kosovo (1); Kyrgyz Republic (6); Moldova (2); Mongolia (4); Montenegro (1); Morocco (3); Poland (12); Romania (10); Russian Federation (9); Serbia (4); Tajikistan (7); Tunisia (4); Turkey (21); Ukraine (13). There were 16 PSDs for regional projects that did not require translations. Translations of 20 PSDs remained outstanding at the end of the period under review.

¹ Please note that PSDs for Regional Projects are not translated since they often relate to a wide geographical region and would require multiple translations, many of which would not be relevant.

No Category A project has yet been approved under the 2014 PIP, so no PSD update of Category A projects has happened; this will be reported on in the 2015 PIP Implementation Report.

3.2 Public sector projects

PIP requirements:

“Board Reports for public sector projects will be made available to the public on request, once the project has been approved by the Board of Directors. Information considered confidential, as set out in Section E of the Policy, will be removed from the documents prior to release.”

Implementation:

One request for the release of a Public Sector Project Board report was received during the period under review.

3.3 Cancelled, rejected or inactive projects

PIP requirements:

“Project Summary Documents (PSDs) will be removed from the website as soon as the associated project is cancelled, rejected, or if inactive for a year. However, where a PSD is (i) for a “Category A” project, with an associated Environmental and Social Impact Assessment, the PSD and all associated information on the website will be removed, six months after the date on which it would otherwise have been removed and (ii) a cancelled project where the cancellation followed the commencement of a review under the PCM, the PSD will be kept on the website until such time that the PCM review process has been completed. The Bank, however, may at its discretion, leave such PSDs on the website for a longer period.”

Implementation

Two PSDs were removed from the website during the period under review.

3.4 Environmental and social information relating to projects

PIP requirements:

“For projects approved by the Board of Directors, Summary information on the environmental and social issues associated with Bank projects and the associated mitigation measures are included as part of the Project Summary Document. The Bank may, at its discretion, disclose other environmental and social reports and studies that it commissions from time to time, for public comment or for information, on its website.”

For “Category A” projects, in addition to the disclosure required of the clients under the Environmental and Social Policy, the Bank will make available Environmental and Social Impact Assessments on “Category A” on the EBRD website in its Headquarters in London and in the relevant EBRD Resident Office a minimum of 60 calendar days prior to consideration of the project by the Board of Directors for private sector projects and 120 calendar days prior to Board consideration for public sector projects. For projects located in countries where EBRD does not have a Resident Office, alternative means of disclosure will be identified on the ESIA webpage for the project. ESIA’s are made available in local language and may be available in whole or in part in other languages, where appropriate.

Notification of the documents’ availability will be posted on the EBRD website A notification on the EBRD ESIA web page will also list locations of full availability of ESIA documents locally and link to the Client’s website or other website as appropriate.

Relevant documents for Category A Projects that are directly financed by the EBRD are found on the Environmental and Social Impact Assessment webpages. Relevant documents for Category A projects that are financed under special funds will be found on the relevant fund web pages.

The Project Summary Document will summarise i) the rationale for categorisation of a project; ii) a description of the main environmental and social issues associated with the project; iii) key measures agreed to mitigate the risks and impacts; iv) where greater than 25,000t CO2 equivalent/year, the expected GHG emissions of the project; v) a summary of any disclosure or consultation activities, and vi) a link to the ESIA page for Category A projects.

The disclosure of project information and public consultation, where appropriate, is the responsibility of clients. The EBRD requirements for disclosure of project information by the client are contained in the EBRD Environmental and Social Policy.

Portfolio information on environmental and social issues is provided in the annual EBRD Sustainability Report, which is published on the Bank’s website.”

Implementation Summary for 2014

A total of 13 “Category A” projects, requiring an environmental and social impact assessment, were in an active disclosure period in 2014.

Eight of the projects proceeded to the Board of Directors for review and Approval; five projects have not yet been scheduled for Board consideration. Two additional projects that were in a disclosure process were cancelled and removed from the website after six months, in accordance with the PIP 3.3.

Of the projects proceeding to the Board of Directors, all projects met the requirement of 60 days minimum disclosure for Private Sector projects or 120 days minimum disclosure for public sector projects prior to the Board of Directors’ consideration of the Project.

All 13 projects’ full ESIA disclosure packages were available in local language and were disclosed electronically. Links were provided on the

individual project's ESIA web page on the EBRD website. Beginning 7 November 2014, all new ESIA's were disclosed directly on the EBRD website in addition to the Client's website.

In 2014, one request was made by an institution to review ESIA's in EBRD's offices in London.

The 2014 PIP and ESP went into effect on 7 November 2014. By the end of 2014, tools and training were developed to implement the new requirements for enhanced environmental and social sections of Project Summary Documents going forward. These included 1) Implementation Guidelines to the PIP for all Bank staff which include disclosure of environmental and social information in the PSDs, which are now part of the Bank's Operational Guidelines, and 2) a Guidance Note on Project Summary Documents for the staff of the Environmental and Sustainability Department and development of an Assurance Framework. The Assurance Framework is an ESD management system and now includes a standard Terms of Reference for Category A and most Category B projects to prepare Non-Technical Summaries that will be attached to the Project Summary Document going forward

Table 4: Summary of Category A Disclosure/Board Review in 2014

Country	Project Number	Project Name	Sector	Date EIA HQ/RO	Board Date	Days available (before Board)	Language of ESIA
1. Turkey	44166	Central Anatolia (Etlik) Hospital PPP	Private	24/05/13	N/A	--	Turkish and English
2. Georgia	45335	Adjaristsqali HPPs (Shuakhevi)	Private	17/10/13	30/04/14	196	Georgian and English
3. Romania	44601	Land Power Wind Farm	Private	14/11/13	29/01/14	77	Romanian, and some documents in English
4. Georgia	45542	Dariali HPP	Private	20/01/14	07/05/14	108	Georgian and English
5. Turkey	45474	Alpaslan II dam hydro project	Private	09/04/14	25/06/14	78	Turkish and English
6. Poland	45739	Darlowo Wind	Private	07/05/14	15/10/14	162	Polish and some in English
7. Poland	45805	Gdansk expansion	Private	09/05/14	15/10/14	160	Polish and English
8. FYR Macedonia	45987	National roads programme	Public	27/05/14	11/11/14	169	Macedonian and English
9. Kazakhstan	45618	Yereymentau Wind Farm	Public	30/07/14	26/11/14	120	Russian and some documents in English
10. Turkey	44596	EFELER GPP	Private	23/09/14	N/A	--	Turkish and English
11. Poland	46496	Korytnica	Private	15/10/14	N/A	--	Polish and English
12. Poland	46962	Polenergia Wind Farm portfolio	Private	15/10/14	N/A	--	Polish and English
13. Kazakhstan	46788	Project Koktaszhal	Private	14/11/14	N/A	--	Kazakh and some in Russian and English

3.5 Aggregate information on transition impact

“The Bank will publish in its Annual Report aggregate information on transition impact with geographical and sectoral breakdowns.”

Implementation

The aggregate information on transition impact was included in the Bank’s 2014 Annual Report which was published in May 2015.

4. ACCOUNTABILITY AND GOVERNANCE RELATED INFORMATION

As part of the Bank’s commitment to corporate governance, the following information will be disclosed and posted on the Bank’s website.

4.1 Compliance documentation

List of ineligible entities

PIP requirements:

“The Bank will post on its internet site a list of persons and or entities subject to Debarment or Debarment with Conditional Release or a Notice of Mutual Enforcement pursuant to the Bank’s Enforcement Policy and Procedures. The posting shall remain on the site for as long as the Debarment or Mutual Enforcement remains in effect.”

Implementation:

Following the entry into force of the Agreement for Mutual Enforcement of the Debarment Decisions amongst the Bank, the African Development Bank Group, the Asian Development Bank (the ADB), the Inter-American Development Bank Group (IaDB) and the World Bank Group (WBG) (available at <http://www.ebrd.com/downloads/integrity/Debar.pdf>), in 2014 the Bank cross debarred 54 entities and 33 individuals based on a total number of 48 debarment notices received from the World Bank Group, the Inter-American Development Bank and the Asian Development Bank.

In 2014, following separate proceedings instituted under the Bank’s Enforcement Policy and Procedures, the Bank debarred one individual and one corporate entity.

The list of all EBRD debarred entities and individuals can be found at <http://www.ebrd.com/ineligible-entities.html>

Anti-Corruption Reports

PIP requirements:

“The Bank’s Anti-Corruption Report, published annually by the Office of the Chief Compliance Officers, will be publicly released and posted on the Bank’s internet site.”

Implementation:

The Integrity and Anti-Corruption Report for the year 2013 was released and posted on the Bank’s Website on 17th April 2014 and can be found at:

<http://www.ebrd.com/downloads/integrity/acreport13.pdf>

Project Complaint Mechanism (PCM)

PIP requirements:

“The following information and/or documents will be publicly released and posted on the Bank’s website.

- *the PCM Rules of Procedure;*
- *PCM Annual Reports;*
- *copy of complaints received, once registered in accordance with the PCM Rules of Procedure;*
- *Eligibility Assessment Reports, subject to the conditions set out in the PCM Rules of Procedure;*
- *Problem-solving Completion Reports or summaries thereof, subject to the conditions set out in the PCM Rules of Procedure, and related Problem-solving Initiative Monitoring Reports, if any;*
- *Compliance Review Reports, Management Action Plans, Complainant Comments, and related Compliance Review Monitoring Reports, if any*
- *information regarding each of the PCM experts, and*
- *information brochures and pamphlets about the PCM.”*

Implementation:

PCM Rules of Procedure

In May 2014 the EBRD Board of Directors approved the new PCM Rules of Procedure, which came into force on 7 November 2014. Complaints registered before this date, continue to be processed under the PCM Rules of Procedure (2009).

The PCM Rules of Procedure (2014) are available on-line in the following languages:

English: <http://www.ebrd.com/downloads/integrity/pcmrules.pdf>

French: <http://www.ebrd.com/downloads/integrity/pcmrulesf.pdf>

Russian: <http://www.ebrd.com/downloads/integrity/pcmrulesr.pdf>

Arabic: <http://www.ebrd.com/downloads/integrity/pcmrulesarb.pdf>

Bosnian: <http://www.ebrd.com/downloads/integrity/pcmrulesbsn.pdf>
Georgian: <http://www.ebrd.com/downloads/integrity/pcmrulesg.pdf>
Mongolian: <http://www.ebrd.com/downloads/integrity/pcmrulesmng.pdf>
Turkish: <http://www.ebrd.com/downloads/integrity/pcmrulestrk.pdf>
Ukrainian: <http://www.ebrd.com/downloads/integrity/pcmrulesukr.pdf>

PCM Rules of Procedure (2014) in other languages of the Bank's countries of operations are in the process of translation and will be posted on the PCM web pages as/when they become available.

The PCM Rules of Procedure (2009) remain on the PCM web pages as follows:

English: <http://www.ebrd.com/downloads/integrity/pcmrules09.pdf>
French: <http://www.ebrd.com/downloads/integrity/pcmrules09f.pdf>
Russian: <http://www.ebrd.com/downloads/integrity/pcmrules09r.pdf>

PCM Annual Report, other PCM publications and resources

The fifth PCM Annual Report, covering the year 2014 will be posted on the PCM web pages in March 2015 at: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/about.html>. The Report will also be translated into French, Russian and Arabic and will be available on the same webpage.

A *PCM User Guide* is available in English:

<http://www.ebrd.com/news/publications/guides/pcm-user-guide.html>.

Translation of the *PCM User Guide* into other languages of the countries of operations is in process; they will be posted on the Bank's website on progressive basis.

A PCM information leaflet is available in English, French and Russian, as well as in Arabic, Mongolian and Turkish at <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/about.html>.

In addition, a *Guide for EBRD clients* is available in English and Russian at <http://www.ebrd.com/downloads/integrity/pcmclientguide.pdf> and <http://www.ebrd.com/downloads/integrity/pcmclientguider.pdf>, respectively.

A new on-line PCM Complaint form has been introduced in 2014. It is available on the PCM web pages in English and Russian:

http://www.ebrd.com/eform/pcm/complaint_form?language=en
http://www.ebrd.com/eform/pcm/complaint_form?language=ru

Sample Complaint Forms are also available on the PCM web pages in English and Russian: http://www.ebrd.com/downloads/integrity/sample_complaint_form.pdf and http://www.ebrd.com/downloads/integrity/sample_complaint_form_russian.pdf

PCM Experts

Information regarding the current roster of PCM Experts can be found at <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-experts.html>

PCM Complaints

In the course of 2014, the PCM received 14 Complaints (five warranted registration and nine were deemed ineligible) and continued working on four Compliance Reviews and three Compliance Review Monitoring Reports.

Nine Complaints were deemed ineligible by the PCM in 2014 because they did not relate to issues covered by an environmental and social policy or the project-specific provisions of the Public Information Policy, did not relate to an EBRD-financed project, or raised allegations of fraud or corruption, procurement matters or matters related to Article 1 of the Agreement Establishing the Bank and adequacy of EBRD policies.

Five Complaints warranted registration in 2014 in relation to the following projects: Oltenia-Turceni Rehabilitation, Romania; DIF Lydian (Amulsar Gold Mine), Armenia (two Complaints); South-West Corridor Road, Kazakhstan; Dariali Hydro Power Plant (“HPP”), Georgia. The Complaints on the DIF Lydian project have since been found ineligible for further PCM processing . Full texts of all registered Complaints are available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

Also in 2014, the PCM completed Eligibility Assessments and commenced Compliance Reviews with respect to four Complaints registered in 2012 and 2013 in relation to the following projects: EPS Emergency Power Sector Reconstruction Loan, EPS Power II and EPS Kolubara Environmental Improvement, Serbia; and Energy Resources Phase II and Oyu Tolgoi, Mongolia. Compliance Reviews are on-going and the Eligibility Assessment Reports are available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

Following the findings of non-compliance published in January 2014, Compliance Review Monitoring Reports for: Boskov Most HPP project, FYR Macedonia, Ombla HPP project, Croatia and Paravani HPP project, Georgia. The Reports are available on the PCM Register: <http://www.ebrd.com/work-with-us/project-finance/project-complaint-mechanism/pcm-register.html>.

4.2 Evaluation documentation

PIP requirements:

“The Evaluation Department (EvD) provides public access to its reports except insofar as needed to protect commercial confidentiality concerns (see 4.2.2).

The following documents will be disclosed:

- *the Bank’s Evaluation Policy;*
- *EvD’s Annual Evaluation Review (AER);*
- *EvD’s Annual Work Programme and Budget;*
- *summaries of Operational Evaluations*
- *synopsis reports summarising key findings of EvD Validations;*
- *special and thematic studies and approach papers.*

Publicly issued evaluation material will ordinarily not contain transaction-specific material that might raise commercial confidentiality concerns. EvD will ensure a prior internal Bank review of transaction-focussed reports to determine whether redaction is needed to protect confidentiality. EvD will carefully consider any resulting recommendations in making its decision about wider publication. Other reports produced by EvD not specifically identified above may also be released subject to this procedure.

Formally approved management comments on any of the foregoing documents (summaries and reports etc.) are publicly released and posted in full on the Bank’s website with the document to which they relate.

The Board of Directors is kept informed about the findings of EvD reports and discusses details in the Audit Committee; however, final responsibility for the content of EvD reports released to the public resides with EvD.”

Implementation:

The following EvD documents subject to the conditions set out in the PIP were posted on the Bank’s website in 2014:

EvD’s Annual Evaluation Review (AER)

2013 Annual Evaluation Review and management comments

2014 Annual Evaluation Review - approach paper

EvD’s Annual Work Programme and Budget

2015/16 Evaluation Work Programme and Budget 2015

Summaries of Operation Evaluations

1. 2012 An electrical distribution company
2. 2013 An ICT company
3. 2011 An SME Bank
4. 2012 A mining company
5. 2013 A wind farm
6. 2014 A state owned railway
7. 2013 The Slovak sustainable energy finance facility (SLOVSEFF)

8. 2014 A chemical manufacturer
9. 2014 A power sector project

Synopsis reports summarising key findings of EvD Validations

July 2014: Project evaluation findings and ratings 1H 2014

Special and thematic studies and approach papers

1. Achieving equity investment objectives: a review of initiatives since 2007 (report and management comments)
2. The EBRD's experience with policy dialogue in Ukraine (approach paper, report, annexes, 5 case studies, management comments, external peer review comments)
3. Private sector participation in municipal and environmental infrastructure projects (report and management comments)
4. The EBRD Shareholder Special Fund – interim evaluation (approach paper, report with management comments and annexes)
5. Agribusiness sector review – approach paper
6. Transactions with state-owned firms – approach paper
7. Sustainable energy efficiency facilities – approach paper
8. Russian railway sector evaluation – approach paper and working paper

All of the web postings followed internal circulation.

4.3 Other documentation

Annual Sustainability Report

PIP requirements:

“The Bank will report annually on its environmental and social sustainability activities, including implementation of the Environmental and Social Policy. This information will be presented electronically on the Bank’s website. A summary of this report will also be provided in print format.

In addition, summaries of the meeting of the Bank’s Environmental and Social Advisory Council (ESAC) will be publicly released and posted on the Bank’s website in English, following the review of the summary by the Council.”

Implementation:

The Bank issued its *2013 Sustainability Report* at the Bank’s Annual Meeting in May 2014. The 2013 Report covers a wide range of EBRD investments and achievements and these include the Bank’s Sustainable Energy Initiative, investment in municipal infrastructure, micro and small business finance and donor support. The Report also looks at the way in which the EBRD operates and how the Bank engages with its stakeholders. The report was published on-line, supported by a summary printed report. The digital version of the report is posted in English on the Bank’s website at: <http://sr.ebrd.com/>. The printed

version is available at: <http://www.ebrd.com/documents/comms-and-bis/pdf-sustainability-report-2013.pdf> and
<http://www.ebrd.com/downloads/research/sustain/sr12r.pdf>

In 2014, one meeting of the Environmental and Social Advisory Council was held. The summary of the meeting held on 31 January 2014 was posted on the Bank's website at
<http://www.ebrd.com/cs/Satellite?c=Content&cid=1395241335783&d=&pagename=EBRD%2FContent%2FDownloadDocument>

Annual Procurement Review

PIP requirements:

“An annual review, subject to the removal of confidential material, will be publicly released and posted on the Bank's website.”

Implementation

The Annual Procurement Review 2013 was published on the Bank's website in May 2014.

Annual Report on Engagement of Consultants by EBRD

PIP requirements:

“An annual report, subject to the removal of confidential material, will be publicly released on the Bank's website.”

Implementation:

The Annual Report on Engagement of Consultants by EBRD 2013 was published on the Bank's website in September 2014.

Annual Purchasing (Corporate Procurement) Review

PIP requirements:

“An annual review, subject to the removal of confidential material, will be publicly released and posted on the Bank's website.”

Implementation:

The Annual Corporate Procurement Review 2013 was published on the Bank's website in September 2014.

Public Information Policy: Reports on implementation

PIP requirements:

“The Secretary General will report to the Board on implementation of the Policy on an annual (calendar year) basis and such reports, in English and Russian, will be publicly released on the Bank’s website.”

Implementation:

The PIP Implementation Report for 2013 was posted on the Bank’s website.

Annual Financial Report

PIP requirements:

“The Annual Financial Review, which forms part of the Bank’s Annual Report, will be publicly released on the Bank’s website, in conjunction with the Annual Report.”

Implementation:

The Annual Financial Report for 2013 was posted on the Bank’s website in May 2014.

5. INFORMATION CONSIDERED CONFIDENTIAL (SECTION E OF THE PIP)

Section E of the PIP states that certain information considered confidential will not be disclosed. It includes categories of information that are considered confidential.

6. IMPLEMENTATION AND MONITORING OF THE PUBLIC INFORMATION POLICY (SECTION F OF THE PIP)

“The Secretary General, advised as necessary by the General Counsel and other Members of the Executive Committee, will oversee and verify compliance with the Policy. The Secretary General will report to the Board on implementation of the Policy on an annual (calendar year) basis and the Report will be publicly released and posted on the Bank’s website.”

Implementation:

The PIP Implementation Report for 2013 was posted on the Bank’s website.

Relations with civil society

“The Bank has a dedicated contact point for communications with the representatives of member governments, donors, media, local affected communities, civil society organisations and other stakeholders. The Bank endeavours to respond, as appropriate, and after consultation with relevant parties, to reasonable requests for information on other aspects of the Bank’s work, subject to the clarifications regarding confidential information set out in Part E of the Policy.”

Implementation:

In 2014, the EBRD continued to enhance its engagement with civil society organisations (CSOs) in its countries of operations through outreach and information sharing about its activities. The Bank also increased both its working-level and high-level dialogue between civil society and senior management, most prominently with the President, Vice-President and Board of Directors. There was also early engagement with civil society on the Bank’s key policies, strategies, and complex investment projects. In total, the Bank organised 42 thematic meetings with civil society on issues of interest and concern to them, attended by 470 civil society representatives.

The EBRD, via the Civil Society Engagement Unit, regularly informed CSOs about the latest EBRD developments of interest to civil society through a variety of means, including dedicated webpages for civil society on its website, a quarterly EBRD-CSO Newsletter (available in English and Russian), targeted email notifications and alerts and use of social media platforms, such as Facebook and Twitter. In line with the PIP, relevant CSOs that had registered with the EBRD were notified about the start of the consultation period for Category A projects and were invited to provide their comments on the Environmental and Social Impact Assessments (ESIAs) to the Bank and its clients.

In 2014, the EBRD organised four consultation meetings with civil society on the review of country strategies for Armenia, Kyrgyz Republic, Romania and Tajikistan. It also consulted with civil society on the development of the first country strategies for Cyprus, Jordan and Morocco. The Bank recognises that consultation on strategies at concept stage, provides a wider range of perspectives in strategy design.

The Bank also completed the comprehensive consultation process for the review of its Environmental and Social Policy, Public Information Policy and the Project Complaint Mechanism. The two-stage consultation process, which started in 2013, was conducted in accordance with a stakeholder engagement plan prepared for each policy and the provisions of the 2011 Public Information Policy. The Bank organised public meetings in Almaty, Casablanca, Kiev, London, Moscow, Sofia and Tbilisi, and a video conference in Belgrade, which were attended by a total of 190 stakeholder representatives.

In relation to the Bank’s investments, international and local CSOs engaged in dialogue with the EBRD on 45 investment projects in 19 countries where the Bank operates, as well as 3 regional investment facilities.

The 2014 Civil Society Programme, the flagship event of EBRD's engagement with CSOs, included 52 registered participants from 23 countries; 12 sessions in the official programme; 9 parallel sessions organised upon request from civil society organisations and an associated event on climate change co-organised with the Climate Investment Funds. During the two-day Programme, the EBRD staff, senior management, President and Board of Directors exchanged views with civil society representatives, took stock of lessons learned from the previous year of operations in the EBRD's region of operations and discussed ways forward for 2014-2015.

7. IMPLEMENTING PROCEDURAL PROVISIONS FOR INFORMATION REQUESTS AND APPEALS (ANNEX TO THE PIP)

PIP requirements:

“The Secretary General has responsibility for issuing implementing procedural provisions for information requests and appeals and, in the event of an appeal decision to refuse the release of information (which has been the subject of an appeal) will, as appropriate, inform the Board. The Implementing procedural provisions for information requests and appeals will be publicly released and posted on the Bank's website.”

The Policy also specifies that in the annual *Public Information Policy: Report on Implementation*, which is posted on the EBRD website, the Bank will report on its handling of requests and will provide a record of responses.

An Annex to the PIP sets out implementing procedural provisions for information requests and appeals.

Implementation:

Handling Information Requests

The handling of information requests was consistent with the Implementing Procedural Provisions for public information requests. The Bank fulfilled obligations regarding responses and timeframes of responses to information request.

In 2014, the Communications Department coordinated responses to 272 different items of correspondence.

Out of the 272 requests, 88 were related to the Public Information Policy, and concerned accountability and governance (4); general institutional information (4); policy and strategy (9); projects and project finance (67); publications (3); procurement and purchasing (1).

All PIP-related requests came from the following senders: 82 from Civil Society; 1 from a member of the public; 2 from the Private Sector, and 3 from students/academics.

In geographic terms the sources of requests were the following countries: Azerbaijan, Belgium, Georgia, Hungary, Jordan, Slovak Republic, Slovenia, Switzerland, Poland and Turkey (1 each); Albania, Croatia, Netherlands, Tunisia (2 each); Czech Republic (3); Germany and UK (4 each); Kazakhstan and Serbia (5 each); Bosnia & Herzegovina and Russia (6 each); Egypt (9); Romania (10); Ukraine (12); and Other (6).

With regard to the project-related correspondence, the major sectors of interest were Agribusiness (6); Energy, Energy Efficiency & Climate Change (7); General Industries (6); MEI (8); Natural Resources (14), and Power & Energy (18).

Twelve PIP-related requests received a negative response, either because the information was classified as confidential (under Section E of the Policy) or because it did not relate to the work or activities of the Bank. . Eight requests were not responded to inside the stipulated timeframe of 20 working days, mainly due to the responsible staff travelling for extensive periods of time or the quantity of information required. Nine requests were answered partially and one referred to a client.

The remaining correspondence received and responded to was of a general non-PIP related nature and covered such areas EBRD Data, Events & Visits to Bank (including the Annual Meeting), Funding and Scholarships, General Institutional Information, Jobs, Consultancy and Internships, Non-EBRD Research Data & Statistics, Policy & Strategy, Procurement & Purchasing, Project Related Information, Publications, and Project Finance.

The number of information requests and responses covered in this section reflects only the limited amount of correspondence received by the Bank either via the information request on-line form or forwarded to the Civil Society Engagement Unit and Communications Department by various EBRD teams for the coordination of responses. It does not reflect the total amount of correspondence that the EBRD conducts with external audiences.

Enhancing access to the Bank's website

“In recognition of the importance of the EBRD website (www.ebrd.com) in communicating information to stakeholders and the general public, the Bank will continue to enhance access to the site and to the information posted on it as well as on its social media platforms. The Bank will also continue to explore ways in which more country specific information can be translated for posting on the website. At the same time, the Bank will explore means, other than its website, to communicate in its countries of operations, through the public release of documents in its Resident Offices.”

Implementation:

2014 was a breakthrough year for the EBRD's website and its activity online. It saw ebrd.com successfully migrated onto a new, advanced content management system (Oracle Webcenter) and the website itself re-engineered, redesigned and, to a certain extent, reimagined. This was a huge and highly complex project

delivered jointly by IT and Communications together with external contractors which took almost two years to deliver from start to finish.

The technical challenges aside, the project's principal goal was simple enough: to enhance and modernise the way the EBRD communicates with its stakeholders and the general public. Given that the migration and relaunch only went live at the end of November, it is perhaps premature to draw final conclusions about their impact. However, a few early impressions are apparent.

- Early feedback on the changes has been highly favourable. This chimes with the extensive user-testing that informed many of the creative decisions taken throughout the project cycle. The consensus is that the new site is considerably easier to use and navigate than its predecessor.
- The new website is 'responsive', in other words it displays equally well on mobile, tablets and desktops. This was not the case previously.
- The versions of the website in French, German and Russian are also a considerable improvement on previous iterations.

The new website and the CMS powering it lay the foundations for significantly improved communication between the EBRD and its audiences in the future. Work to develop new functionality which will provide an even better service to users continues (and would have been impossible within the limitations that obtained in the past).

For nearly all of 2014, however, ebrd.com was published via the previous CMS (Documentum) and visible to the world only within the old templates. These constraints notwithstanding, the website continued to innovate and vary its content mix in an attempt to reach new audiences.

Particularly worthy of note were the 'New Europe' series on the EBRD's activity in the Central and East European countries that joined the EU in 2004 and our coverage of the Annual Meeting in Warsaw.

It is also worth mentioning that a Client Satisfaction Survey for the EBRD revealed that 50% of all clients and potential clients would describe its website (the old, pre-relaunch version) as 'Good' and 35% as 'Very Good'.

While search engines continue to be the most common route users take to find content on ebrd.com, our email service, Govdelivery, for news, procurement opportunities and PSDs etc. goes from strength to strength. Over the year the number of our subscribers grew by 57% to 30,769 and the number of subscriptions by 47% to 78,337.

Social media platforms such as LinkedIn, Twitter and Facebook offer new ways for the EBRD to communicate with audiences, both by broadcasting our own messages but also by listening to what others are saying about the Bank and responding when appropriate. They can help enhance access to ebrd.com but can also succeed as communication tools independently of it.

At the end of 2014 the EBRD had nearly 19,000 followers on LinkedIn, almost 9,000 on Twitter and just under 8,000 ‘friends’ on Facebook. Beyond these numbers, the Communications department also tracks other social media metrics, including ‘potential reach,’ ‘sentiment,’ ‘interactions’ and our Klout score, to gain a better understanding of our audience