



Nordic Development Fund

Public Information Policy

Adopted by the Board of Directors
on 12 June 2024
In force as of 1 July 2024

Public Information Policy

Responsible Department:	Administrative and Institutional Services (AIS), (following organisational change 1 January 2026)
Adopted by:	Board of Directors
Adopted on:	12 June 2024
Entry into force:	1 July 2024
Revision cycle:	Every 3 years
Last review date:	12 June 2024
Replaced documents:	-
Related documents:	-
Information classification:	Public

Version history

Document name	Adopted by	Adopted on	Entry into force
Policy on Access to Information	Board of Directors	20 November 2018	1 December 2018
Policy on Access to Information	Board of Directors	31 May 2011	1 July 2011

Contents

1	Introduction.....	4
2	Guiding principles.....	4
2.1	Presumption of disclosure.....	4
2.2	Accountability.....	4
2.3	Transparency.....	5
3	Disclosure of information.....	5
3.1	Governance.....	5
3.2	Financial reporting and reporting on non-financial results.....	5
3.3	Projects.....	5
4	Limitations on disclosure.....	6
4.1	Information provided in confidence.....	6
4.2	Deliberative and decision-making processes.....	6
4.3	Personal data on staff and third parties.....	7
4.4	Legal, disciplinary, or investigative matters.....	7
4.5	Safety and security.....	7
4.6	Exceptional circumstances.....	7
5	Information request process.....	8

1 Introduction

This document (the “**Policy**”) sets out the principles of the Nordic Development Fund (“**NDF**”) on the public disclosure of information.

NDF is committed to progressively expanding transparency in its activities. This involves fostering trust through open communication and accountability in line with the interests of the Nordic countries and the practices of international financial institutions. This development is guided by international best practices and is carried out having regard to NDF’s organisational capacity.

NDF makes information concerning its status, strategies, policies, and activities available to the public while at the same time respecting the legitimate confidentiality concerns of its stakeholders.

The channels for NDF’s proactive communication activities are described in the communications approach, as updated from time to time and available on NDF’s website.

2 Guiding principles

NDF recognises that making information available for its stakeholders and to the public is an integral part of good governance and administration. To promote these goals, NDF follows a set of guiding principles:

2.1 Presumption of disclosure

NDF will apply a presumption in favour of disclosure regarding NDF and in all its activities, financing or otherwise. There are situations where the legitimate interests of NDF, its stakeholders or the public, including affected people, may need to be protected, and therefore disclosure of information is not possible. These limitations on disclosure are set out in Section 4 (Limitations on Disclosure) of this Policy.

2.2 Accountability

NDF is responsible for the proper management and effective use of resources put at its disposal. As a common international development financing institution, NDF is capitalised with public funds, and accountability and public trust are therefore of fundamental importance to NDF for fulfilling its Purpose. Providing the public and stakeholders with essential information about NDF and its activities is a key element of this accountability.

2.3 Transparency

NDF strives to be as transparent, accurate and timely as possible in making information available, while bearing in mind its commitments to confidentiality obligations. The principle of transparency is vital to ensure alignment with NDF's Purpose and to NDF's dedication to prevent Prohibited Practices¹, including corruption and fraud in all its activities.

3 Disclosure of information

The information on NDF that is published on NDF's website or in its publications may be freely reproduced, provided that the source is clearly mentioned, and the information concerned is not modified. NDF reserves all copyrights and intellectual property rights and retains the right to withdraw reproduction rights at any time.

Any use of NDF's public material for commercial purposes requires NDF's prior written approval.

3.1 Governance

In line with its commitment to transparency and accountability, NDF makes available on its website its constituent documents (i.e. the Agreement, NDF's Statutes and the Host Country Agreement), essential parts of its staff documents, and other relevant policies in the NDF legal framework.

NDF also makes available information concerning its governance structure, such as its governing bodies and the relevant codes of conduct and rules of procedure.

To further enhance the commitment to transparency and accountability, details regarding the work of NDF's Board of Directors, such as meeting dates and agendas, will progressively be made available to the public.

3.2 Financial reporting and reporting on non-financial results

Detailed and audited financial statements of NDF are published in the Annual Financial Report. Since 2022, reporting on non-financial results is annually published in the Results Report. Both the Annual Financial Report and the Results Report are made available on the website.

3.3 Projects

NDF continuously publishes information about its projects. This information is primarily available on NDF's public project database, available on its website. In addition, in line with the communications approach, NDF highlights results and other

¹ As defined in the Integrity and Anticorruption Policy.

key milestones in its communication products, such as articles, social media content, videos and publications.

NDF decides on the information disclosed concerning its projects in cooperation with, among others, its counterparties, and co-financiers to ensure that information is factually correct.

NDF discloses project related information at the latest at the time of the signing of the financing documents. NDF emphasises on communicating the expected or achieved results and impact of the projects receiving NDF funding. NDF may have to refrain from or delay particular disclosure, for example, due to confidentiality agreements or similar undertakings (see Section 4 – Limitations on disclosure).

NDF encourages recipients of NDF funding, and the implementing agencies and partners of the projects financed from NDF funds, to commit themselves to transparency and accountability in the project operations and expects them to disclose, to the general public, to groups affected by the projects and to other interested parties, relevant information on the projects, their impacts and their implementation, including contracts awarded to consultants, contractors and suppliers.

4 Limitations on disclosure

While every effort is made to keep limitations to a minimum, the following conditions shall, with due regard to the privileges and immunities of NDF, apply to all information referred to in this Policy:

4.1 Information provided in confidence

Certain information is provided to NDF under an explicit or implied confidentiality undertaking and may not be disclosed without consent from the source. NDF is obliged to treat such information with due care. Access to such information may occasionally be restricted even within NDF. NDF refrains from making information publicly available that contain financial, business, or proprietary information of third parties, without the express permission of the owner of such information.

4.2 Deliberative and decision-making processes

NDF, in line with its commitment to progressively expand transparency in its activities, strives to make publicly available decisions reached by its governing bodies, which includes making the minutes of the Board of Directors publicly available, to the extent that they do not contain confidential information or personal data.

To facilitate and safeguard the free and candid exchange of ideas within its operations and between and/or within NDF and its governing bodies, NDF seeks to preserve the integrity of the deliberative process. Meetings of the Board of Directors are not held in public. Internal documents and memoranda written by the Managing

Director of NDF, by NDF's staff, and by Board members and their alternates as part of deliberative processes are considered confidential and are not publicly available.

NDF also cooperates with various international organisations, as well as private sector entities and financial institutions, in the context of its operations. In this regard, documents and information exchanged with NDF's co-investors, such as development finance institutions and international organisations, and with recipients of financing are not publicly available.

The Code of Conduct for the Board of Directors and the Managing Director and other relevant governance and institutional policy documents may contain more specific provisions on disclosure of confidential information.

4.3 Personal data on staff and third parties

NDF is committed to the proper handling of personal data and safeguarding the privacy of its staff and external parties. NDF will disclose personal data only in alignment with NDF's Privacy Policy and other applicable data protection standards.

4.4 Legal, disciplinary, or investigative matters

NDF will not disclose information in circumstances where disclosure would violate applicable law, contractual obligations or could subject NDF to undue litigation risk.

NDF will not disclose information regarding legal advice, information subject to attorney-client privilege, nor matters in legal dispute or matters under negotiation.

NDF will not release information provided to NDF relating to any investigation of alleged fraud, corruption, misconduct, or other violation of NDF's Anticorruption and Integrity Policy or other policies, or any other information related to such investigations, except to the extent specifically permitted by NDF's policy on such matter.

NDF will not provide access to or release information relating to proceedings of internal grievance and such like mechanisms except to the extent expressly permitted under the applicable NDF policy.

4.5 Safety and security

NDF will not disclose information that could compromise the security, safety, or health of NDF's staff and their families, consultants, experts, and contractors, NDF's assets or any other individual, or the national security of member countries.

4.6 Exceptional circumstances

NDF may, under exceptional circumstances, make available to the public information ordinarily excluded from disclosure when it determines that the benefits of such disclosure would outweigh the potential harm, except where NDF is legally obligated to confidentiality.

NDF reserves the right not to disclose, under exceptional circumstances, information that it would normally disclose if it determines that such disclosure is likely to cause harm that outweighs the benefits of disclosure.

5 Information request process

Anyone may contact NDF to request information.

Requests for information shall be made in writing to NDF and addressed to at info@ndf.int. Information requests should primarily be submitted in English. The information request should, with reasonable detail, identify what information is being sought to enable NDF to process the request within a reasonable period of time. NDF will generally only reply to reasonably specified and detailed requests, that is, it will not respond to blanket requests for information. If an information request is not sufficiently detailed, NDF will ask the requester to provide clarification.

NDF will notify the requester within ten (10) working days that the information request has been received. A decision regarding an information request shall be made no later than thirty (30) working days after receiving the request or additional clarification if such is needed. In exceptional cases, the time limit of thirty working days may be extended, in which case, the requester will be informed accordingly.

In the response to an information request, NDF shall either provide the information or provide the reasoning for denying it. If the information request is denied, the reasoning shall specify the reasons for the refusal and the relevant provisions of this Policy justifying the refusal.

NDF is not required to comply with any request that would require NDF to create or develop information or data that does not already exist or is not available in NDF's record keeping system.